

Spotlight

FATF Publishes Mutual Evaluation Reports for 4 Jurisdictions

Over the last six months, FATF has finalised and published the Fourth Round mutual evaluation reports (MER) for Spain, Norway, Australia and Belgium. FATF has been careful to point out that these reports are substantially different in nature from previous assessments, as they include the new obligations introduced in the 2012 revision of the FATF Recommendations. Also the assessment of the effectiveness of the countries' anti-money laundering and counter-terrorist financing (AML/CFT) systems was done on the basis of the new effectiveness methodology, which takes a fundamentally different approach from the assessment of compliance against the FATF 40 Recommendations. The effectiveness assessment results in conclusions on how well the countries' AML/CFT measures are working in practice, based on comprehensive analysis of the extent to which the countries achieve a defined set of outcomes that are central to a robust AML/CFT system. Both qualitative and quantitative information are used to support that analysis.

That being said, a review of all four MERs demonstrates the increased emphasis now being placed on effectiveness, when compared to technical compliance. While technical compliance still remains the foundation of the AML/CFT evaluation, the focus is now on how well the jurisdictions are executing the technical measures and how well the instituted systems and structures

work to combat money laundering and terrorist financing.



SPAIN – On December 5, 2014 FATF published Spain's MER acknowledging that Spain has created a strong system to combat money laundering (ML) and terrorist financing (TF), but indicating that improvements are needed in certain key areas, most notably regarding targeted financial sanctions and wire transfers. In terms of effectiveness, the report noted that Spain performs well in some areas, including financial intelligence and confiscation. However, implementation is less effective in some other areas, such as with regard to the penalties for ML and the inadequate use of targeted financial sanctions.

Strengths – Spain is commended for having a high level of understanding of its ML/TF risks, drawn from a wide array of good quality risk assessments from different sources. Although the variety of risk assessments had

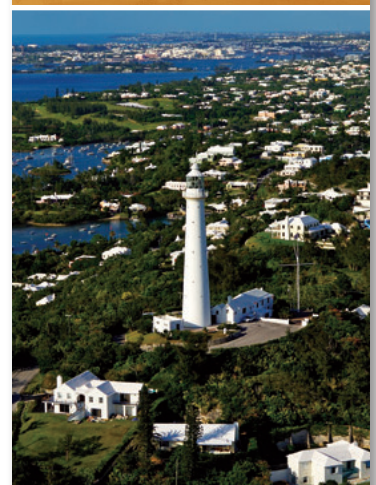


SPECIAL POINTS OF INTEREST:

- FATF Publishes Mutual Evaluation Reports for 4 Jurisdictions pg. 1-4
- Chairman's Statement pg. 5

INSIDE THIS ISSUE:

- Appointment of National Coordinator to the Office of NAMLC pg. 6
- Agency Reports pg. 7-9
- Minister of Legal Affairs Issues Further Advisory pg. 10



not been coalesced into a single national risk assessment the report noted that this was not a deficiency. Additionally, the report noted that the implementation of preventive measures in the banking and notaries public sectors is good; AML/CFT supervision in the financial sector is good; and access to beneficial ownership information, based on the systems used by notaries public, is an example of good practice.

Weaknesses – On the other side of the spectrum, the report noted that having regard to the attendant risks, Spain's AML/CFT supervision of lawyers, auditors, tax advisors and the real estate sector was a work in progress. It was also noted that Spain's wire transfer standards were not in line with the revised FATF standards; and several areas of under-resourcing were noted, particularly vis-à-vis supervision of the DNFBP sector and the provision of international cooperation in the area of confiscation.

In sum Spain was found to have a high level of effectiveness in one Immediate Outcome (IO); a substantial level of effectiveness in seven of the eleven IOs; and a moderate level of effectiveness in three IOs. Spain was found to be Compliant in 25 of the 40 FATF Recommendations, Largely Compliant in 12 and Partially Compliant in only 3 of the Recommendations. The report recommended a number of priority actions to Spain, in order to address the areas of weakness noted above, among others. These include requiring Spain to intensify supervision of lawyers, real estate dealers and trust and corporate service providers; update the wire transfer regulations to align with FATF's revised standards; ensure adequate sanctions are imposed for ML offences; and apply targeted financial sanctions when appropriate, for instance when its not possible to prosecute the offender.



NORWAY – On December 18, 2014 FATF published Norway's MER which indicated that Norway has taken some good

initiatives to combat money laundering and terrorist financing, but needs to establish overarching policies and strategies, and address significant weaknesses in a number of key areas. At the foundation of the assessment is the finding that although Norway had published a first of its kind national risk assessment, it had significant shortcomings, with the result that the authorities still do not have a sufficient understanding of ML risks. While noting that the TF risk assessment was much stronger, the report indicated that the information on and analysis of, Norway's ML risks is incomplete. The consequence of this shortcoming is that National AML policies are based on this improper understanding of the ML risk; and there is considerable variation and inconsistency among competent authorities in their implementation of AML/CFT priorities based on risk.

Strengths – Coordination of strategies at the national level to combat TF and Proliferation Financing were found to be stronger than in relation to ML. Norway's understanding of its TF risks was found to be sound and it was noted that action was being taken to detect and disrupt TF in line with the identified risks. The report also noted that Norway has a good legal foundation and sound institutional structure for combatting ML; as well as a strong legal framework for the freezing, seizing and confiscation of criminal proceeds. Norway's extensive system of registers on legal ownership and control of wholly-Norwegian-owned entities was noted as being of assistance in preventing misuse of legal persons and in enabling competent authorities and the public to obtain beneficial ownership information in a timely manner.

Weaknesses – In addition to the issues noted above vis-à-vis the national risk assessment, the report also identified as a weakness the absence of comprehensive statistics on matters related to AML, which it was felt hindered the ability of authorities to assess ML/TF risks and to establish evidence-based AML/CFT policies in response to the identified risks. Also noted was the absence in Norway of over-arching national policies or strategies to combat ML/TF and the lack of an AML/CFT coordination mechanism at a national level. The report also highlighted the poor or inconsistent usage by competent authorities of STR analysis/financial intelligence. Despite the sound legal and institutional framework in place for AML, competent authorities were found not to place priority on the investigation and prosecution of ML; and in spite of policy priority on confiscation, the results were also found to be unsatisfactory in this regard. In the area of AML/CFT supervision, the report noted with concern the fact that compliance with targeted

financial sanctions has not been reviewed or discussed as part of on-site visits and has not formed part of supervision in any sector outside of banking.

In sum, Norway was found to have a Moderate level of effectiveness in all, but two of the eleven, Immediate Outcomes (IO). Only in IOs 2 and 9 was Norway found to have a Substantial level of effectiveness. From the Technical Compliance perspective, Norway was found to be Compliant or Largely Compliant in 22 of the 40 FATF Recommendations, and Partially Compliant in all of the rest. Accordingly, the report contained a laundry list of priority actions that Norway is required to take to remediate the many areas of deficiency noted in the report.



AUSTRALIA – On April 21, 2015 FATF published Australia’s MER which indicated that Australia has strong legal, law enforcement and operational measures for combating money laundering and terrorism financing, but important improvements are needed in a number of key areas, such as in the supervision of its regulated sectors.

Strengths – The report notes that Australia has identified and assessed and has a good understanding of its TF risk and most of its main ML risks and does have mitigating strategies in place. From a technical standpoint Australia scored well in most areas, particularly in the criminalisation of money laundering, financial intelligence and confiscation policies. From an effectiveness standpoint, Australia showed high results in international cooperation, and substantial results in risk, policy and coordination, the use of financial intelligence and combating terrorist financing and proliferation financing, requiring only moderate or minor improvements in these areas.

Weaknesses – Despite Australia’s good understanding of most of its ML risks, it was noted that some key risks remain unaddressed and, inconsistently with the FATF Standards, the authorities are focussed more on predicate crime rather than

on ML. Additionally, deficiencies were noted in the framework for preventive measures and supervision, in particular for designated non-financial businesses and professions.

In sum, Australia was found to have a High level of effectiveness in relation to one IO, a Substantial level of effectiveness in relation to four IOs, and a Moderate level of effectiveness in relation to six IOs. On the technical side, Australia was found to be Compliant or Largely Compliant in relation to twenty-four FATF Recommendations, Partially Compliant in ten Recommendations and Non-Compliant in the remaining six Recommendations. In light of the deficiencies noted, the report recommended improvement in relation to the assessment of TF risk on legal persons and arrangements; steps to be taken to ensure that beneficial ownership information is collected and available; ML risks to be reassessed in accordance with the guidelines set out in Recommendation 1; and more emphasis to be placed on investigating and prosecuting ML at the federal and state levels.



BELGIUM – On April 23, 2015 FATF published Belgium’s MER which indicated that Belgium has the core elements needed to develop a sound AML/CFT regime, although some elements are not yet fully in line with the 2012 FATF Recommendations. It was noted that the legal framework technically complies in broad terms but still needs to be adapted to the revised FATF requirements of 2012.

Strengths – The report notes that Belgium has evaluated its ML and TF risks and appears to understand its TF risks correctly and to have taken coordinated action at the national level to attenuate those risks and to combat proliferation financing. As to the ML risks, these have been generally identified and understood. The report also indicated that in respect of effectiveness, Belgium has done well in the areas of international co-operation; use of financial information; and prosecution of terrorist financing acts, therefore, requiring only moderate improvements in these areas.

FATF Publishes Mutual Evaluation Reports for 4 Jurisdictions continued

Weaknesses – Although Belgium has identified its ML risks, the report indicates that a certain number of them have not been addressed; there was incomplete participation of certain competent authorities and the private sector in the assessment of the national risks; and the non-confidential results of the national assessment had still not been disseminated to some competent authorities and the private sector at the time of evaluation. Additionally, it was noted that major improvements are needed in certain areas, including in assimilating the findings of the national risk assessments into national AML/CFT policy and strategy; in the targeting of ML prosecutions; and in the implementation of preventive measures in the DNFBP sector.

In sum, Belgium was found to have a Substantial Level of effectiveness in four of the eleven IOs, and a Moderate Level of effectiveness in relation to the remaining seven IOs. On the technical side, Belgium was found to be Compliant in relation to eleven FATF Recommendations, Largely Compliant in relation to eighteen Recommendations and Partially Compliant in relation to the remaining eleven Recommendations. In light of the deficiencies noted, the report required a number of priority actions to be taken, including the setting of priorities by competent authorities in terms of ML/TF actions and recommendations and the incorporation of these into AML/CFT policy; the establishment of a concrete and coordinated strategy

for the criminal prosecution of ML; the allocation of appropriate resources to ML/TF supervision; and the establishment of risk-based supervision, resulting in the scope, frequency and intensity of such supervision being determined by the nature of the ML/TF risk.

Persons are strongly encouraged to read and digest the MERs published by FATF as and when they are available, in order to get a more comprehensive understanding of the methodology; the approach being taken by evaluation teams; and the manner in which countries are performing, in relation to both the technical and effectiveness standards.

Spain's full report is available at:

www.fatf-gafi.org/countries/s-t/spain/documents/mer-spain-2014.html

Norway's full report is available at:

<http://www.fatf-gafi.org/topics/mutualevaluations/documents/mer-norway-2014.html>

Australia's full report is available at:

<http://www.fatf-gafi.org/topics/mutualevaluations/documents/mer-australia-2015.html>

Belgium's full report is available at:

<http://www.fatf-gafi.org/topics/mutualevaluations/documents/mer-belgium-2015.html>



Dear All,

I take pleasure in welcoming you to the first NAMLC newsletter for the calendar year 2015, in which we highlight important developments and achievements that occurred during the quarter ending March 31, 2015. Special thanks go to the Office of NAMLC team for the key role that they have played in the preparation and publication of this newsletter, which is intended to be the recommencement of NAMLC's quarterly communication on AML/ATF matters.

Since the September 2014 publication of the newsletter, the first set of Fourth Round Mutual Evaluation Reports (MERs) was published by the Financial Action Task Force (FATF) in December 2014 and a further set was released in April 2015. This is an important development, as these MERs document the findings of the earliest evaluations of the AML/ATF regimes of a number of countries, against the revised FATF standards, using the new FATF methodology that was finalised in 2013. These reports can serve as a useful tool to better understand the methodology and as a means of determining the areas of Bermuda's own regime which require greater focus and attention. Therefore, it is important for all relevant persons in Bermuda to examine and digest these reports as we prepare for the upcoming mutual evaluation of Bermuda's AML/ATF regime. A summary of these published MERs are provided in this issue.

On the domestic side, Ms. Paula Tyndale was appointed as the new National Coordinator in January 2015. She has commenced coordinating the finalisation of the updates to the legislative framework to bring it in line with the revised FATF standards, as part of the preliminary preparations for Bermuda's mutual evaluation. As part of that work, she has formulated updated instructions for the draft bill that is expected to be circulated to industry later this month, with a view to tabling legislation in Parliament during the upcoming Summer Session.

During the quarter, the Office of NAMLC team, led by the National Coordinator, and myself had meetings with all of the constituent agencies of NAMLC and other relevant bodies, to discuss the findings from the National Risk Assessment and the requirements of the new Methodology. These meetings were an important part of our ongoing preparations for the review of Bermuda's AML/ATF regime, as the discussions highlighted gaps in the framework and discussed options for addressing the issues that were identified. It is intended that follow-up meetings will be held on a periodic basis to ensure that we are appropriately moving forward to achieve the required level of compliance with the standards and that we have in place a strong and robust AML/ATF regime.

Finally, it should be noted that the previously anticipated timeframe (May – October 2016) for Bermuda's mutual evaluation by the International Monetary Fund (IMF) has been vacated, as the IMF's resource challenges has necessitated a rescheduling for Bermuda's review. Although this will mean that Bermuda's evaluation will commence much later than the 2016 timeframe, we cannot afford to become complacent or reduce our focus on these matters. There is much work still to be done to bring Bermuda's AML/ATF laws, systems and policies in line with the revised FATF standards; and more importantly to ensure that the implementation of these laws, systems and policies can be demonstrated to be effective in combatting money laundering, terrorist financing and proliferation financing. Thus, I emphasise that all competent authorities, supervisory bodies and relevant industry entities will need the required commitment and investment of time and resources to further strengthen our systems and processes so that Bermuda remains a well-respected financial services jurisdiction with a robust AML/ATF infrastructure.

In light of this, I look forward to your continued support and cooperation and thank you in advance for your unrelenting commitment to this important work.

Sincerely,

Cheryl-Ann Lister

Appointment of National Coordinator to the Office of NAMLC

Ms. Paula Tyndale was appointed as National Coordinator and took up office on January 5, 2015. Ms. Tyndale is no stranger to the National Anti-Money Laundering Committee (NAMLC), having acted as Legal Consultant to the Minister of Justice, with assignment to the Office of NAMLC, between November 2009 and October 2010. During this time she worked closely with the Chair of NAMLC and was part of the FATF/CFATF Working Group, led by the Chair, that prepared the 2010 report on Money Laundering using Trust and Corporate Service Providers. Prior to that, she was the Senior Crown Counsel (Specialist) in the Department of Public Prosecutions, spanning the period November 2004 and October 2009. There she specialised in proceeds of crime, extradition and mutual legal assistance, in addition to carrying out general prosecutorial functions. Ms. Tyndale's prosecutorial experience dates back to October 1994 when she commenced her career as a Clerk of the Courts in

Jamaica; and went on to distinguish herself as a specialist in the areas of proceeds of crime, extradition and mutual legal assistance, while she was Crown Counsel, Assistant Director of Public Prosecutions and Deputy Director of Public Prosecutions in Jamaica.

Ms. Tyndale heads the Office of NAMLC and her primary task as National Coordinator is to lead and coordinate Bermuda's efforts to prepare for its upcoming Fourth Round mutual evaluation by the International Monetary Fund against the anti-money laundering and anti-terrorist financing standards established by the Financial Action Task Force. She will not only draw on the lessons learned during the 2007 mutual evaluation, in which she participated as the technical expert for the Department of Public Prosecutions; but also on her training as a CFATF Legal examiner in FATF's methodology for the Fourth Round.



Bermuda Monetary Authority

During this first quarter, the Authority continued to focus on assessing Bermuda's financial services market in terms of the anti-money laundering/anti-terrorism financing (AML/ATF) compliance, by incorporating the findings of the 2013 National Risk Assessment into the supervisory process, including the onsite, offsite and outreach schedules.

Revisions to the AML/ATF Guidance Notes continued during the quarter, with finalisation of the following sections: Overview of CDD; Outsourcing, PEPs; Third Party Reliance; and Record Keeping. A draft Guidance Note on Sanctions was also prepared and is in the process of final review and discussion prior to roll out.

A total of 2 on-sites were undertaken in the first quarter of 2015 covering Trust and Investment licensees. On the other hand, offsite examinations focused on the service providers for Non Licensed Persons applications. In addition the team deals with ad hoc requests for opinions on the adequacy of AML Policies and Procedures submitted by applicants for licenses under the Non Licensed Persons process and relevant regulatory regimes.

During the first quarter presentations were given to the Investment Industry and a round table discussion with the Trust Industry was held, on the findings from the National Risk Assessment.

Also during the first quarter the AML team provided AML/ATF training to 40 BMA staff as part of the mandatory training.

Financial Intelligence Agency (FIA)

The FIA reported that during the first quarter 2015 they received a total of 123 Suspicious Activity Reports (SARs), and contained within these SARs were 771 transactions.



A breakdown analysis of the total SARs received showed that: 34 SARs involved suspicious cash exchanges at financial institutions conducted within 556 transactions with a total value of \$1,088,987.00 BMD; and 28 SARs involved suspicious wire transfers out of Bermuda using Money Service Businesses as their transmitter. The SARs filed during that quarter were filed by 14 entities, with the majority being submitted by the local banks and Money Service Businesses, while Law Firms, Long-term insurers and Fund Services filed the remainder.

During the said period the FIA made 40 disclosures, of which 32 were made to local competent authorities and 8 were made foreign counterpart authorities. The majority of the local disclosures were made to the BPS.

Within the same quarter the FIA conducted eight (8) training sessions relative to Money Laundering, Terrorist Financing and the use of goAML (the FIA's operating software). Additionally the FIA had the opportunity to take part in a number of training sessions and informative conferences/forums which included a two day symposium on the UK Bribery Act hosted by Government House and a two-day Public Access to Information (PATI) training session for Public Authorities.

HM Customs

During the first quarter of 2015, HM Customs seized \$887,195.15 in accordance with section 50 of the Proceeds of Crime Act 1997. All monies seized were handed over to the Bermuda Police Service's Financial Crime Unit (FCU) for follow-up investigations.

HM Customs continues to share information with the Bermuda Police Service, the Financial Intelligence Agency, US Customs and Border Protection, Canada Border Service Agency and their colleagues in the Caribbean.



Department of Public Prosecutions (DPP)

During the first quarter of 2015, the DPP continued to actively prosecute money laundering offences and to pursue and seize the proceeds of crime wherever possible. During the first quarter the following developments occurred: there were ongoing proceedings in the Magistrates’ and Supreme Court in respect of four (4) matters that commenced in 2014; there was one (1) conviction for money laundering resulting in \$135,299.53 being forfeited; two (2) money laundering cases commenced; and the DPP restrained funds as a result of a request for mutual legal assistance from a foreign jurisdiction. In addition, the DPP obtained a forfeiture order for \$5,198.00 pursuant to section 51 of the Proceeds of Crime Act 1997.

During that quarter, the DPP exposed a member of the Specialist team to AML/ATF training under the auspices of the Asset Forfeiture and Money Laundering Section (United States Department of Justice) in Colombia, South Carolina.



Bermuda Police Service (BPS)

In the first quarter of 2015, the BPS made a total of 7 arrests with regard to money laundering offences. Further the Financial Crime Unit processed one Property Freezing Order under Section

36H of the Proceeds of Crime Act 1997 (POCA) in relation to cash in the amount of \$826,000.00; two cash seizures totalling \$31,152.15; and three Forfeiture Orders under Section 51 of POCA in relation to cash totalling \$1,015,674.18 BMD.

During this period, the Financial Crime Unit (FCU) received 31 disclosures from the Financial Intelligence Agency, a large portion of which pertained to on-going investigations or highlighted current money laundering trends.

Additionally, during the quarter FCU assisted the office of the Attorney General in freezing a fairly significant amount of funds.

Registry General

In the first quarter of 2015, the Registry General received 6 applications to register new charities and 13 applications to renew/re-register existing charities. The Registrar General approved 1 new charity and deferred the registration for the remaining 5 applicants. During the period, in accordance with the requirement for registered charities to file their financial statements, the Registry General received 46 financial statements from various registered charities.

Further, during the first quarter the Registry General continued its work on preparing Guidance Notes concerning Anti-Money Laundering and Anti-Terrorist Financing requirements for charities. These Guidance Notes should be finalised shortly and when complete will be available on the websites of the Registry General and the Centre on Philanthropy.

Office of NAMLC (the Office)

During the first quarter the Office has continued to assist with coordinating the updating of the legislative framework through the medium of the current draft Bill to amend a number of AML/ATF legislation. It is anticipated that a draft bill will be circulated to industry in May 2015, with a view to having the Bill tabled before the House rises for its summer recess in July 2015.

The Office team participated in the Bermuda Bribery Forum in January 2015, which was hosted by His Excellency the Governor and involved a team put together by the Foreign and Commonwealth Office, involving experts from the UK's Ministry of Justice. The Forum facilitated the provision and exchange of information concerning the UK Bribery Act 2010 and Bermuda's own legislative framework, insofar as bribery and corruption generally are concerned. During the Forum, discussions also centred around the requirements of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (the Anti-Bribery Convention) and

the UN Convention Against Corruption (UNCAC), as well as a number of other international legal instruments on similar subjects. Arising from this Forum, the Chairman and the Office of NAMLC committed to participating in an inter-Ministerial Working Group designed to identify and make recommendations on the means by which Bermuda will become fully compliant with the requirements of the OECD Anti-Bribery Convention and UNCAC, the latter of which is a requirement under FATF Recommendation 36. During the quarter this working group was convened and, led by the NAMLC Chair, commenced its work, starting with a comparative review and analysis of the legislative framework in Bermuda vis-à-vis both the OECD Anti-Bribery and UN Corruption Conventions.



Further, during this period the Office team and Chair have held a series of consultative meetings with all NAMLC Agencies/Ministries and other relevant stakeholders, in order to get a better sense of where the respective NAMLC Agencies are in preparing for the next IMF Evaluation of Bermuda's AML/CFT framework and to see where the gaps are. Discussion topics in the meetings included the NRA; Outstanding Technical Compliance gaps; the FATF Methodology, particularly the relevant Immediate Outcomes for respective Agencies and any gaps or issues; Agency's risk assessment; and next steps. In addition to the NAMLC Agencies, meetings were held with the Office of the Tax Commissioner; Department of Social Insurance; the Registry General; the Registrar of Companies; the Bar/Accountant AML/ATF Board; the Bermuda Stock Exchange; the Internal Auditor and the Auditor General.



Attorney General and Minister of Legal Affairs, the Hon. Trevor Moniz, JP, MP, on 20 March 2015, issued a further Advisory (2015/1) to Bermuda financial sector regarding the 'Risks Relating to deficiencies in Anti-Money Laundering and Anti-Terrorist Financing (AML/ATF) Systems and Controls in Specified Jurisdictions'. The Advisory, which superseded the December 2014 Advisory, was issued further to the FAFT Public Statement of 27 February 2015 and the FATF Publication on 'Improving Global AML/CFT Compliance: Ongoing Process', which described the AML/ATF deficiencies in a number of jurisdictions. The Minister noted that the advice is especially relevant to those entities that have, or are considering, any business relationships with the specified jurisdictions, or individuals, or corporate entities in such jurisdictions.

The FATF Public Statement draws attention to serious deficiencies in Iran and the Democratic People's Republic of Korea (DPRK). Both countries were identified in previous FATF public statements but continue to raise concerns for the FATF by their continued failure to adequately address on-going and substantial deficiencies in their anti-money laundering and combating the financing of terrorism (AML/CFT) regimes. The FATF is particularly and exceptionally concerned with Iran's failure to address the risk of terrorist financing and the serious threat this poses to the integrity of the international financial system. The FATF therefore reaffirmed its call on its members and other jurisdictions to apply counter-measures against each jurisdiction.

In addition, the FATF drew attention in the public statement to a separate list of countries with strategic AML/CFT deficiencies that have not demonstrated satisfactory and sufficient progress in addressing the deficiencies. It should be noted that these countries have, for the most part, taken some steps to strengthen their regimes. Those jurisdictions are: Algeria, Ecuador, and Myanmar. The FATF calls on its members to consider the risks arising from the deficiencies associated with each jurisdiction. Details of the relevant risks are provided in the public statement.

It should also be noted that, due to the satisfactory progress made in implementing its FATF-agreed action plan, Indonesia is now included in the FATF document, "Improving Global AML/CFT Compliance: On-going Process".

Improving Global AML/CFT Compliance: on-going process

In a separate publication 'On-going process to improve global AML/CFT compliance', the FATF once again highlighted a number of jurisdictions with strategic deficiencies in their AML/CFT regimes and provides information on these deficiencies. These jurisdictions were previously identified by the FATF as working with the FATF and relevant regional bodies to address those deficiencies. However the FATF has now called for the expeditious implementation of their agreed action plans. The jurisdictions listed in this category are: Afghanistan, Angola, Guyana, Indonesia, Iraq, Lao PDR, Panama, Papua New Guinea, Sudan, Syria, and Yemen.

However, at the February Plenary Uganda was identified separately as 'not making sufficient progress' on its FATF agreed action plan. This jurisdiction was urged to take sufficient action to implement significant components of its action plan by June 2015, and was warned that failure to do so will result in the FATF taking further action regarding the risks arising from the deficiencies associated with this jurisdiction.

Finally, the FATF welcomed the significant progress of Albania, Cambodia, Kuwait, Namibia, Nicaragua, Pakistan and Zimbabwe in improving their AML/CFT regimes. These jurisdictions are therefore no longer subject to monitoring under the FATF's on-going global AML/CFT compliance process, but will work with their relevant FATF-style regional body (FRSB), as they continue to address the issues identified in their Mutual Evaluation Reports and further strengthen their AML/CFT regime.

The Minister's Advisory was supported by annexes containing the full text of the FATF statement and publication, and has been published in various public media by way of press release and is also available on the NAMLC website at www.namlc.bm.

It should be noted that as the nature and level of risk in the specified jurisdictions differ, it is important that the advisory and the annexes are read in their entirety.



we are on the web

www.namlc.bm

**Office of the National Anti-Money
Laundering Committee**

4th Floor, Global House
43 Church Street
Hamilton, HM12
Bermuda

Phone: 441-294-9797

E-mail: info-NAMLC@gov.bm

NAMLC QUARTERLY ~ May 2015

Government of Bermuda

Ministry of Legal Affairs

The Hon. Trevor Moniz J.P.

Attorney General & Minister of Legal Affairs

Editorial Staff

NAMLC Team