AML COUNTRIES OF CONCERN CHART - MARCH 1, 2024

Country or Territory	1. OFAC Sanctioned	2. State Sponsor of Terrorism	3. Major Money Laundering Country	4. Tax Havens/ IMF & USDS	5. FATF AML/CFT & FinCEN	6. Section 311 ML Concerns	7. Other Concerns (See Legend)
Afghanistan (Taliban)			MMLC				BP, ST, T3TIP
Aland Islands			1444.0		\/++		IG TIP
Albania Alderney (Channel Islands)			MMLC		X**		TIP IG
Algeria			MMLC				T3TIP
American Samoa			WIWIEO	EU Blacklist			10111
Andorra				IMF OFC			IG
Angola (UNITA)							BP, TIP
Anguilla				IMF OFC/EU Blacklist			
Antigua & Barbuda			MMLC				IG, TIP
Argentina			MMLC				IG, BMPE
Armenia Aruba			MMLC MMLC	IMF OFC			TIP TIP
Australia			IVIIVILO	IIVIF OFC			IG
Austria							IG
Azerbaijan							TIP
Bahamas			MMLC	IMF OFC			IG
Bahrain							
Balkans	<u>BALKANS</u>						BP
Bangladesh	1						TIP
Barbados	DELABUR		MMLC				TIP
Belarus Belgium	BELARUS		MMLC				BP, TIP IG
Belize			MMLC	IMF OFC, USDS OFC			IG, TIP
Benin			MMLC	IIVII OI O, OODO OI O			TIP
Bermuda			WIIVIEO	IMF OFC			
Bhutan							TIP
Bolivia			MMLC				TIP
Boznia and Herzegovina							TIP
Botswana			USDS UC				TIP
Brazil			MMLC	""= 0=0			IG, BMPE, TIP
British Virgin Islands			MMLC	IMF OFC			TID
Brunei Bulgaria							TIP TIP
Burma (Myanmar)	BURMA		MMLC		X* & FinCEN	Entities	BP, T3TIP
Burkina Faso	DOTAWA		WIIVIEO		X**	Littuco	TIP
Burundi							TIP
Cabo Verde			MMLC				TIP
Cambodia			USDS UC				TIP
Cameroon					X**		TIP
Canada	040		MMLC	IMF OFC			DD TID
Central African Republic	CAR		MMLC	IMF OFC/USDS OFC/EU Blacklist	X**		BP, TIP IG
Caymen Islands Chad			IVIIVILG	IIVIF OFC/USDS OFC/EU BIACKIISL	^		TIP
Chile							IG
China			MMLC				DF, T3TIP
Colombia			MMLC				IG, BMPE
Comoros							IG, T3TIP
Congo, Democratic Republic	DRCONGO				X**		BP, TIP
Cook Islands			100	IMF OFC			IG IO TIP
Costa Rica Côte d'Ivoire (Ivory Coast)			MMLC				IG, TIP BP, TIP
Croatia					X**		TIP
	İ.		100		٨		T3TIP
Cuha	Y	X .	KAKAI ('		i e		10111
<u>Cuba</u> Curacao	Х	X	MMLC MMLC				IG. DF. TIP
Curacao	X	X	MMLC MMLC MMLC	IMF OFC			IG, DF, TIP IG, TIP
Curacao Cyprus Czech Republic	Х	X	MMLC	IMF OFC			IG, TIP IG
Curacao Cyprus Czech Republic Denmark	X	X	MMLC	IMF OFC			IG, TIP IG IG, TIP
Curacao Cyprus Czech Republic Denmark Djibouti	X	X	MMLC MMLC				IG, TIP IG IG, TIP TIP
Curacao Cyprus Czech Republic Denmark Djibouti Dominica	X	X	MMLC MMLC	IMF OFC EU Blacklist			IG, TIP IG IG, TIP TIP EC, IG
Curacao Cyprus Czech Republic Denmark Djibouti Dominica Dominican Republic	X	X	MMLC MMLC MMLC MMLC				IG, TIP IG IG, TIP TIP EC, IG IG, TIP
Curacao Cyprus Czech Republic Denmark Djibouti Dominica Dominican Republic Ecuador	X	X	MMLC MMLC				IG, TIP IG IG, TIP TIP EC, IG IG, TIP TIP
Curacao Cyprus Czech Republic Denmark Djibouti Dominica Dominican Republic Ecuador Egypt	X	X	MMLC MMLC MMLC MMLC MMLC				IG, TIP IG IG, TIP TIP EC, IG IG, TIP TIP TIP TIP
Curacao Cyprus Czech Republic Denmark Djibouti Dominica Dominican Republic Ecuador Egypt El Salvador	X	X	MMLC MMLC MMLC MMLC MMLC MMLC MMLC				IG, TIP IG IG, TIP TIP EC, IG IG, TIP TIP TIP TIP TIP TIP TIP TIP
Curacao Cyprus Czech Republic Denmark Djibouti Dominica Dominican Republic Ecuador Egypt	X	X	MMLC MMLC MMLC MMLC MMLC MMLC MMLC USDS UC				IG, TIP IG IG, TIP TIP EC, IG IG, TIP TIP TIP TIP TIP TIP TIP TIP
Curacao Cyprus Czech Republic Denmark Djibouti Dominica Dominican Republic Ecuador Egypt El Salvador Equatorial Guinea Eritrea Estonia	X	X	MMLC MMLC MMLC MMLC MMLC MMLC MMLC				IG, TIP IG IG, TIP TIP EC, IG IG, TIP
Curacao Cyprus Czech Republic Denmark Djibouti Dominica Dominican Republic Ecuador Egypt EI Salvador Equatorial Guinea Eritrea Estonia Ethiopia	X	X	MMLC MMLC MMLC MMLC MMLC MMLC MMLC USDS UC				IG, TIP IG IG, TIP TIP EC, IG IG, TIP
Curacao Cyprus Czech Republic Denmark Djibouti Dominica Dominican Republic Ecuador Egypt El Salvador Equatorial Guinea Eritrea Estonia	X	X	MMLC MMLC MMLC MMLC MMLC MMLC MMLC USDS UC				IG, TIP IG IG, TIP TIP EC, IG IG, TIP

AML COUNTRIES OF CONCERN CHART - MARCH 1, 2024

Finance	Country or Territory	1. OFAC Sanctioned	2. State Sponsor of Terrorism	3. Major Money Laundering Country	4. Tax Havens/ IMF & USDS	5. FATF AML/CFT & FinCEN	6. Section 311 ML Concerns	7. Other Concerns (See Legend)
Sabon								
Serrols								
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Grand From Nohawak Lands Granded Granded				IVIIVILO	IME OEC			
Greece					IIVII OI C			
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Guenes USDS UC					EU Blacklist			-
Summer S				MMLC				IG, BMPE, TIP
MMIC MMIC X** TIP					IMF OFC			
MMIC				USDS UC				
Haif								T3TIP
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Hungary Hung		HONO KONO			IME OFO			
Hut River Principality		HUNG KUNG		MMLC	IMF OFC			
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Incide								
Indonesia				MMLC				IG TID
Iran								
ITRQ		Y	Y			Y* & FinCEN	Entities	
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Isle of Man (UK) Isle Is		IIIAQZ X IIAQJ			IME OEC			
Israel								
Italy					IIVII OI O			
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Japan						X**		IG. TIP
Jordan				-	IMF OFC			TIP
Jordan								
Kalmykia	Jordan					X**		TIP
MacAshatan MMLC IG. TIP								
Mile								
Kenya MMLC X** TIP Korea, Republic of Nosea, Republic of TIP Kosovo MMLC TIP Kuwait MMLC TIP Lao PDR (Laos) MMLC TIP Latvia Entities TIP Lebanon Entities TIP Lesotho TIP TiP Libora LIBYA2 USDS UC FinCEN T3TIP Libya LIBYA2 USDS UC FinCEN T3TIP Lichtenstein IMF OFC IG IG Lithuania USDS UC USDS OFC IG Macau SAR MMLC IMF OFC Entities IG, TIP Macadonia, North USDS UC IMF OFC Entities IT, TIP Malagascar USDS UC IMF OFC T3TIP Maldives TIP TIP Malagasia MMLC IMF OFC T3TIP Malia MALI IMF OFC T3TIP T1P Marshall Islands				MMLC				
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Lebanon LEBANON Entities TIP Lesotho Image: Company of the property of the prop				IVIIVILO				
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AML COUNTRIES OF CONCERN CHART - MARCH 1, 2024

Peru	Country or Territory	1. OFAC Sanctioned	2. State Sponsor of Terrorism	3. Major Money Laundering Country	4. Tax Havens/ IMF & USDS	5. FATF AML/CFT & FinCEN	6. Section 311 ML Concerns	7. Other Concerns (See Legend)
Moderation Mod					IMF OFC			-
Name USDS UC								
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Nigeria North Korea (UPRIX) X		NICARAGUA		INIMIC				
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Drann			Λ	0000 00		X GTHIOLIT		
Pakistan								
Palaun				MMI C.				
Papen New Gunes USDS UC				WIIWIEO	IMF OFC, FU Blacklist			TIP
Pagus New Guinea				MMI C	IMF OFC FU Blacklist	X**		IG. DF TIP
Parsquay Part MMLC					C. C, LC Didokilot			
Peru				MMLC		+		IG, BMPE, TIP
Philippines								
Poland Portugal						X**		
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Russian Federation RUSSIA/UKRAINE MMLC IG. 13TIP					5. 5			
Rivanda		RUSSIA/UKRAINE		MMLC				
Samoa IMF OFC, EU Blacklist TIP								
Saudi Arabia MMLC					IMF OFC, EU Blacklist			
MMLC X** TIP					5. 5, 25 2.555			TIP
Serbia				MMLC		X**		TIP
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Slovak Republic								TIP
Sovenia	Singapore			USDS UC	IMF OFC			
Solomon Islands Somalia Somali	Slovak Republic							IG, TIP
Somalia SOMALIA USDS UC	Slovenia							
South Africa South Korea South Sudan Sin Lanka Sin Lan	Solomon Islands							
South Korea SOUTH SUDAN USDS UC X** T3TIP		<u>SOMALIA</u>		USDS UC				
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Syria X X USDS UC X* & FinCEN Entities BP, T3TIP Taiwan IMF OFC IG IG TIP IG TIP TIP </td <td></td> <td></td> <td></td> <td></td> <td>IMF OFC</td> <td></td> <td></td> <td></td>					IMF OFC			
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AML COUNTRIES OF CONCERN CHART – MARCH 1, 2024								
Country or Territory	1. OFAC Sanctioned	2. State Sponsor of Terrorism	3. Major Money Laundering Country	4. Tax Havens/ IMF & USDS	5. FATF AML/CFT & FinCEN	6. Section 311 ML Concerns	7. Other Concerns (See Legend)	
United Kingdom			MMLC	IMF OFC			IG	
United States			MMLC					
Uruguay							BMPE	
US Virgin Islands				EU Blacklist			TIP	
Uzbekistan			MMLC				TIP	
Vanuatu				IMF OFC, EU Blacklist			IG, TIP	
Venezuela	VENEZUELA		MMLC				IG, BMPE, T3TIP	
Vietnam			MMLC		X**		IG, TIP	
Yemen	YEMEN				X**		BP, T3TIP	
Zambia							TIP	
Zimbabwe	ZIMBABWE						BP, TIP	

Legend:

- 1. Office of Foreign Assets Control (OFAC) Sanctioned Countries http://www.treas.gov/ofac. OFAC maintains a country sanctions webpage with active links to detailed information about each. If the country tag is listed in column 1 rather than an "X", the sanction program is not all encompassing and impacts only transactions with or benefitting designated persons. Countries with broad prohibitions are indicated in Column 1 with an "X." Detailed information on the sanctioned countries in column 1 can be found at https://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx.
- 2. <u>US Department of State Designation as State Sponsors of Terrorism:</u> Countries determined by the Secretary of State to have repeatedly provided support for acts of international terrorism are designated as State Sponsors of Terrorism. For more details about State Sponsors of Terrorism, see "Overview of State Sponsored Terrorism" in the <u>US State Department's Country Reports on Terrorism.</u>
- 3. US Department of State's Bureau for International Narcotics and Law Enforcement Affairs, March 2021 INCSR Volume II Money Laundering report identifies areas where banks engage in significant transactions involving serious crime proceeds. It is not an assessment of the area's legal framework to combat money laundering (ML); its role in terrorist financing (TF); or the degree of its cooperation in the international fight against ML and TF. Additionally, the Bureau has identified areas still uncooperative with international law enforcement and/or have not yet criminalized TF(Comparative Table in the 2021 INCSR Volume II Money Laundering report) and are identified on our report as "USDS UC."
- 4A. Organization for Economic Cooperation and Development Designation as Uncooperative Tax Haven (UTH). There are none as of December 2015.
- 4B. International Monetary Fund (IMF) Offshore Financial Centers (OFC) last published an official list of OFC's in October 2019. These countries are still listed as additional country considerations and identified using "IMF OFC" as a point of reference. The IMF integrated OFC assessment with the Financial Sector Assessment Program (FSAP), a joint effort of IMF and the World Bank. The focus of FSAP assessments is twofold: to gauge the stability of the financial sector and to assess its potential contribution to growth and development, listed at Jurisdictions with Systemically Important Financial Sectors. These countries are important to stability in our overall global economy, but are not considered higher AML/CFT and are therefore not listed on this chart.
- 4C. The International Narcotics Control Strategy Report (INCSR) is an annual report by the Department of State. The report provides a snapshot of the AML/CFT infrastructure of each country or jurisdiction and its capacity to share information and cooperate in international investigations. Countries of primary concern identified by the US State Department as still being offshore financial centers in the INCSR 2021 Volume II. Reports are listed as "USDS OFC."
- 4D. The EU blacklist of non-cooperative jurisdictions, first adopted on December 5, 2017, is part of the EU's effort to clamp down on tax avoidance and harmful tax practices. The current list comprises twelve jurisdictions identified as "EU Blacklist".
- 5. Financial Action Task Force (FATF) does not have any jurisdictions listed as Non-Cooperative Countries or Territories (NCCT) as of this update. The countries indicated above are identified as jurisdictions with strategic Anti-Money Laundering or Combating the Financing of Terrorism (AML/CFT) deficiencies. Refer to recent FinCEN Advisories in addition to earlier advisories and other FATF guidance for details and updates. FinCEN designation indicates countries involved in recent events that elevate the risk of increased assets movement or illicit finance threats. X** = Jurisdictions with AML/CFT deficiencies. X* = Jurisdictions have strategic AML/CFT deficiencies and have not made sufficient progress addressing deficiencies. X = Countries having made significant progress addressing identified strategic AML/CFT deficiencies.
- 6. USA PATRIOT Act Section 311 authorized Treasury's designation of jurisdictions as "Primary Money Laundering Concern" to enforce Special Measures for Jurisdictions, Financial Institutions, or International Transactions. "Entities" in this column indicates the country is not designated, but specifically identified entities within the country are.
- 7. International Monetary Fund summary of OFC services last published March 2004 and the State Department's listing of OFC services EC= Sells Economic Citizenship; IG = Internet Gaming; ST = Commit, threaten to commit, or support terrorism; BP Blocked Property. To compile a comprehensive list of jurisdictions allowing Internet Gambling, several sources were consulted. The GAO Report to Congress on Internet Gambling, December 2002, as well as comprehensive lists found on Casino City and Internet Gambling Google Answers. Countries in the State Department's 2021 Human Trafficking Report (TIP) Countries whose governments do not fully meet the Trafficking Victims Protection Act's (TVPA) minimum standards, but are making significant efforts to meet those standards are identified as "TIP." The additional designation of "T3TIP" denotes Countries whose governments do not fully comply with the minimum standards and are not making significant efforts to do so. BMPE = Countries with Black Market Peso Exchange activity and DF = Duty Free trade zones which may be used in trade-based money laundering as highlighted in FinCEN 2010-A001.

NOTE: For reference only in complying with BSA/AML regulations. Not legal advice.