

AML COUNTRIES OF CONCERN CHART – JULY 30, 2021

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							IG
Albania			MMLC		X**		TIP
Alderney (Channel Islands)							IG
Algeria			MMLC				T3TIP
American Samoa				EU Blacklist			
Andorra				IMF OFC			IG
Angola (UNITA)							BP, TIP
Anguilla				IMF OFC/EU Blacklist			
Antigua & Barbuda			MMLC				IG, TIP
Argentina			MMLC				IG, BMPE
Armenia			MMLC				TIP
Aruba			MMLC	IMF OFC			TIP
Australia							IG
Austria							IG
Azerbaijan							TIP
Bahamas			MMLC	IMF OFC			IG
Bahrain							
Balkans	BALKANS						BP
Bangladesh							TIP
Barbados			MMLC		X**		TIP
Belarus	BELARUS						BP, TIP
Belgium			MMLC				IG
Belize			MMLC	IMF OFC, USDS OFC			IG, TIP
Benin			MMLC				TIP
Bermuda				IMF OFC			
Bhutan							TIP
Bolivia			MMLC				TIP
Boznia and Herzegovina							TIP
Botswana			USDS UC		X**		TIP
Brazil			MMLC				IG, BMPE, TIP
British Virgin Islands			MMLC	IMF OFC			
Brunei							TIP
Bulgaria							TIP
Burma (Myanmar)	BURMA		MMLC		X**	Entities	BP, T3TIP
Burkina Faso					X**		TIP
Burundi	BURUNDI						TIP
Cabo Verde			MMLC				TIP
Cambodia			USDS UC		X**		TIP
Cameroon							TIP
Canada			MMLC	IMF OFC			
Central African Republic	CAR						BP, TIP
Caymen Islands			MMLC	IMF OFC/USDS OFC/EU Blacklist	X**		IG
Chad							TIP
Chile							IG
China			MMLC				DF, T3TIP
Colombia			MMLC				IG, BMPE
Comoros							IG, T3TIP
Congo, Democratic Republic	DRCONGO						BP, TIP
Cook Islands				IMF OFC			IG
Costa Rica			MMLC				IG, TIP
Côte d'Ivoire (Ivory Coast)							BP, TIP
Croatia							TIP
Cuba	X	X	MMLC				T3TIP
Curacao			MMLC				IG, DF, TIP
Cyprus			MMLC	IMF OFC			IG, TIP
Czech Republic							IG
Denmark							IG, TIP
Djibouti							TIP
Dominica			MMLC	EU Blacklist			EC, IG
Dominican Republic			MMLC				IG, TIP
Ecuador			MMLC				TIP
Egypt							TIP TIP
El Salvador			MMLC				TIP
Equatorial Guinea			USDS UC				TIP
Eritrea			USDS UC				T3TIP
Estonia							IG
Ethiopia							TIP
Eswatini							TIP
Fiji				EU Blacklist			TIP

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Finland							IG
France							IG
Gabon							TIP
Gambia							TIP
Georgia			MMLC				
Germany				IMF OFC			IG, TIP
Ghana			MMLC		X**		TIP
Gibraltar				IMF OFC			IG
Grand River Mohawk Lands							IG
Greece							TIP
Grenada							IG
Guam				EU Blacklist			
Guatemala			MMLC				IG, BMPE, TIP
Guernsey (Channel Islands)				IMF OFC			
Guinea			USDS UC				TIP
Guinea -Bissau							T3TIP
Guyana			MMLC				
Haiti			MMLC				TIP
Honduras			MMLC				TIP
Hong Kong	<u>HONG KONG</u>		MMLC	IMF OFC			DF, TIP
Hungary							IG, TIP
Hutt River Principality							IG
Iceland							IG, TIP
India			MMLC				IG, TIP
Indonesia			MMLC				TIP
<u>Iran</u>	X	X	MMLC		X* & FinCEN	Entities	T3TIP
Iraq	<u>IRAQ2 & IRAQ3</u>						TIP
Ireland				IMF OFC			IG, TIP
Isle of Man (UK)				IMF OFC			IG
Israel							IG, TIP
Italy			MMLC				IG, TIP
Jamaica			MMLC		X**		IG, TIP
Japan				IMF OFC			TIP
Jersey (Channel Islands)				IMF OFC			IG
Jordan							TIP
Kahnawake (Canada)							IG
Kalmykia							IG
Kazakhstan			MMLC				IG, TIP
Kiribati							TIP
Kenya			MMLC				TIP
Korea, Republic of							
Kosovo							TIP
Kuwait							TIP
Kyrgyz Republic			MMLC				TIP
Lao PDR (Laos)			MMLC				TIP
Latvia							IG, TIP
Lebanon	<u>LEBANON</u>					Entities	TIP
Lesotho							TIP
Liberia (Diamonds)			MMLC				IG, TIP
Libya	<u>LIBYA2</u>		USDS UC		FinCEN		T3TIP
Liechtenstein				IMF OFC			IG
Lithuania							IG
Luxembourg			USDS UC	USDS OFC			IG
Macau SAR			MMLC	IMF OFC		Entities	IG, TIP
Macedonia, North							TIP
Madagascar			USDS UC				TIP
Malawi							TIP
Malaysia			MMLC	IMF OFC			T3TIP
Maldives							TIP
<u>Mali</u>	<u>MALI</u>						TIP
Malta				IMF OFC			IG, TIP
Marshall Islands							TIP
Mauritania				IMF OFC			TIP
Mauritius					X**		IG, TIP
Mexico			MMLC				BMPE, TIP
Micronesia, Federated States of			USDS UC				TIP
Moldova							TIP
Mongolia							TIP
Monaco				IMF OFC			IG
Montenegro							TIP

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Montserrat				IMF OFC			
Morocco			MMLC		X**		TIP
Mozambique			MMLC				TIP
Namibia							
Nauru			USDS UC	IMF OFC			
Nepal			USDS UC				IG, TIP
Netherlands			MMLC	IMF OFC			
Netherlands Antilles				IMF OFC			IG
New Zealand							TIP
Nicaragua	NICARAGUA		MMLC		X**		T3TIP
Niger			USDS UC				TIP
Nigeria			MMLC				TIP TIP
Norfolk Island							IG
North Korea (DPRK)	X	X	USDS UC		X* & FinCEN		IG, BP, T3TIP
Norway							IG, TIP
Oman							TIP
Pakistan			MMLC		X**		TIP
Palau				IMF OFC, EU Blacklist			TIP
Panama			MMLC	IMF OFC, EU Blacklist	X**		IG, DF, TIP
Papua New Guinea			USDS UC				TIP
Paraguay			MMLC				IG, BMPE, TIP
Peru			MMLC				TIP
Philippines			MMLC				IG
Poland							IG, TIP
Portugal							IG, TIP
Qatar				IMF OFC			TIP
Romania							TIP
Russian Federation			MMLC				IG, T3TIP
Rwanda							TIP
Samoa				IMF OFC, EU Blacklist			
Saudi Arabia							TIP
Senegal			MMLC		X**		TIP
Serbia							IG, TIP
Seychelles				IMF OFC, EU Blacklist			TIP
Sierra Leone							TIP
Singapore			USDS UC	IMF OFC			IG
Slovak Republic							IG, TIP
Slovenia							IG
Solomon Islands							IG, TIP
Somalia	SOMALIA		USDS UC				T3TIP
South Africa							IG, TIP
South Korea							IG, DF
South Sudan	SOUTH SUDAN		USDS UC				T3TIP
Spain			MMLC				IG, DF
Sri Lanka							TIP
St. Kitts & Nevis			MMLC				EC, IG
St. Lucia			MMLC				IG, TIP
St. Maarten			MMLC				TIP
St. Vincent & the Grenadines			MMLC				IG, TIP
Sudan	SUDAN						BP, TIP
Suriname			MMLC				TIP
Swaziland							IG
Sweden				IMF OFC			IG
Switzerland				IMF OFC			IG, TIP
Syria	X	X	USDS UC		X* & FinCEN	Entities	BP, T3TIP
Taiwan				IMF OFC			IG
Tajikistan			MMLC				TIP
Tanzania			MMLC				IG, TIP
Tasmania							IG
Thailand			MMLC	IMF OFC			TIP
Timor-Leste							TIP
Togo							TIP
Tonga							TIP
Trinidad and Tobago			MMLC	EU Blacklist			TIP
Tunisia							TIP
Turkey			MMLC				TIP
Turkmenistan			MMLC				T3TIP
Turks & Caicos				IMF OFC			IG
Uganda					X**		TIP
Ukraine	UKRAINE-EO...		MMLC				TIP
United Arab Emirates			MMLC	USDS OFC			TIP

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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	<u>VENEZUELA</u>		MMLC				IG, BMPE, T3TIP
Vietnam			MMLC				IG, TIP
Yemen	<u>YEMEN</u>				X**		BP, T3TIP
Zambia							TIP
Zimbabwe	<u>ZIMBABWE</u>				X**		BP, TIP

Legend:

- 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>.
- [US Department of State Designation as State Sponsors of Terrorism](#): 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 [US State Department's Country Reports on Terrorism](#).
- 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."
- [Organization for Economic Cooperation and Development](#) Designation as Uncooperative Tax Haven (UTH). There are none as of December 2015.
- [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.
- 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."
- 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".
- 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.
- 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.
- [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.