

Executive Summary

1. This document provides a summary of the anti-money laundering (AML) and countering the financing of terrorism (CFT) measures in place in Burkina Faso as at the date of the on-site visit (23 July to 3 August 2018). It analyses the level of compliance with the Financial Action Task Force (FATF) 40 Recommendations and the level of effectiveness of Burkina Faso's AML/CFT regime. It also provides recommendations on how the regime could be to strengthen.

A. KEY FINDINGS

- The National Risk Assessment (NRA) generally identified the money laundering (ML) and financing of terrorism (FT) risks faced by the country. A number of the competent authorities, including some supervisory authorities have a good understanding of the key ML/TF risks. Financial institutions, particularly banks have a comprehensive understanding of the ML/TF risks they are facing. DNFBBs have a limited understanding of ML/TF risk.
- The TF risk level is considered as moderately high because of the presence of terrorist groups in the sub-region, and the frequent terrorist attacks the country has been experiencing in recent years.
- The institutional framework for national cooperation and coordination is in place. However, this mechanism is being hampered by a limited level of operational coordination.
- Financial institutions, particularly large banks and large DFIs, have generally enhanced their internal AML/CFT systems. The implementation level of preventive measures is lower in the small and medium sized DFIs and the non-bank financial sector. The implementation level of AML/CFT measures in DNFBBs is low, which adversely affects the overall effectiveness of preventive measures in Burkina Faso.
- The supervisory body for banks has a thorough understanding of ML/TF risks in the sector. Off-site AML/CFT inspections using the risk-based approach are conducted on a regular basis, though relevant on-site inspections are limited and sanctions are rarely applied. AML/CFT supervision is limited within the non-bank financial sector and there is no authority designated to supervise or monitor DNFBBs for AML/CFT purposes.
- Burkina Faso has an operational Financial Intelligence Unit (FIU) that accesses a wide range of information. The FIU frequently requests for information from other competent authorities for the purpose of processing the reports it receives from appropriate domestic sources. Majority of the STRs received by the FIU

were filed by banks. Competent authorities use financial intelligence produced by the FIU to a certain extent.

- Burkina Faso has a comprehensive legal framework and robust institutional structure to investigate and prosecute ML, as well as seize and confiscate the proceeds of crime. However, in practice, the criminal investigative and prosecutorial agencies do not seem to prioritize ML investigations. Investigations and prosecutions of proceed generating offences focus more on the underlying offences, resulting in very few ML prosecutions. Furthermore, the criminal investigative and prosecutorial agencies have a low level of expertise in financial investigations and lack the resources to deal with money laundering cases.
- The Burkinabe authorities have recently established specialized courts to handle economic and financial crime matters, including money laundering-related investigations and prosecutions.
- At the policy level, the Burkinabe authorities have prioritized the confiscation of proceeds of crime. However, implementation of this policy at the operational level could not be established.
- Burkina Faso acknowledges the importance of incorporating terrorism financing in the counter-terrorism financing strategy. The National Intelligence Agency has established a platform for the exchange of information and intelligence among the national competent authorities, which permits the integration of TF aspect into the investigation of terrorist activities. Burkina Faso has established a specialized court that deals with terrorist offences. However, a significant number of terrorism-related cases are pending before the court and no terrorism or TF conviction has been secured.
- Burkina Faso has not conducted a comprehensive assessment of the NPO sector. There is no sustained awareness-raising campaign in the sector, and there has been no comprehensive monitoring of at risk NPOs. Burkina Faso has a legal framework for the implementation of targeted financial sanctions on TF and proliferation. The mechanism for the implementation of the United Nations Security Council Resolution 1267 has recorded some delays while the mechanism for the implementation of the United Nations Security Council Resolution 1373 is not yet operational. Burkina Faso has no mechanism in place for the targeted financial sanctions relating to the financing of proliferation. The requirements for the implementation of proliferation-related TFS are generally misunderstood and the reporting entities are generally unsupervised to ensure compliance with TFS.
- The competent authorities can obtain basic information on all types of legal persons incorporated in Burkina Faso. This information is accessible to the public. Burkina has established a sanctions regime that will improve measures to enhance transparency of legal persons, including timely update of basic information. Beneficial ownership information on legal persons and legal arrangements are available in FIs, particularly banks, but generally, criminal

investigative and prosecutorial officers do not contact financial institutions to obtain beneficial ownership information.

- Burkina Faso adopts a collaborative approach with regard to international cooperation. It provides within a reasonable time, good quality information and constructive assistance, including mutual legal assistance, extradition and other forms of cooperation, as and when required. The effectiveness of the international cooperation framework is weakened by the lack of a structured system for the management and monitoring of international cooperation requests. Burkina could be more proactive in seeking judicial assistance.

B. Risks and general background

2. Burkina Faso faces a wide range of ML and TF risks. The major risks relate to the country's geographical position. Burkina shares borders with some states known to be experiencing terrorist activities. Furthermore, several terrorist attacks have been carried out in the country with the complicity of individuals residing abroad. The ML/TF National Risk Assessment acknowledged that various proceeds generating crimes including tax and excise fraud, embezzlement of public funds, illicit drug trafficking, illicit foreign exchange, illicit enrichment, gold-related and wildlife crimes constituted key ML threats within the country. The scale of the informal sector, the shadow economy as well as the increased use of the parallel foreign exchange market where currencies are traded manually and the unregulated and uncontrolled remittances services, coupled with the poor traction of financial inclusion products have increased both ML and TF risk. Nevertheless, the financial sector, particularly the banking subsector remains a major channel of money laundering. Vulnerabilities such as financial institutions' constraints to ensure proper identification of customers and the limited databases for verification, difficulty in accessing beneficial ownership information, the limited supervision of the NPO sector, the limited monitoring of DNFBPs, the poor implementation of AML/CFT requirements within the DNFBP sector and the weak/absence of supervision and sanctions against reporting entities are factors that increase ML/TF risks in Burkina.

C. Overall level of effectiveness and technical compliance

3. Since its mutual evaluation in 2007, Burkina Faso has been improving its AML/CFT regime. Specifically, the country has domesticated the Uniform AML/CFT Act, which has considerably enhanced its legal framework and provided basic elements for an effective AML/CFT regime. In particular, the legislative framework on preventive measures has improved since the last evaluation. The main improvement as regards the country's institutional framework relate to the creation of the specialised courts that handle economic crime cases and cases relating to terrorism and its financing. With regard to the implementation of effective measures in the country, Burkina Faso has collaboratively embarked on international cooperation. Considerable improvement is required in the areas of confiscation, investigation and prosecution for ML, particularly with regard to conducting parallel investigations. The FIU requires additional resources (technology and financial resources) and there is the need for capacity building on AML/CFT within the criminal justice system. Major improvements will be required in the areas of supervision and monitoring of non-bank financial institutions,

designated non-financial businesses and professions as well implementation of preventive measures by these entities. Given the risk of terrorism and its financing, Burkina will need to operationalise mechanisms to implement targeted financial sanctions, intensify efforts to investigate and prosecute TF cases and strengthen collaboration with the NPO sector and ensure that the sector is protected from abuse.

C.1 National AML/CFT policies and coordination (Chapter 2 - IO. 1; R. 1, R. 2, R. 3)

4. Under the auspices of the Permanent Secretariat, established by Order¹ of the Minister of Finance, Burkina Faso conducted a national assessment of its ML/TF risks from 1st July to 30th September, 2017. The process of conducting the NRA, was inclusive and involved key stakeholders in both the public and private sectors. The report was validated during a sharing workshop organized for that purpose and the final document is in the process of being approved by the competent authority. A copy of the NRA report was made available to all sectoral focal points and a series of sharing sessions have been organized for sectors considered as high risk.

5. Competent authorities generally have a fair understanding of the ML/TF risks. At the sectoral level, banking sector, and the insurance sector and their competent supervisory authorities understand and manage the ML/TF risks they are facing, unlike the other financial sector entities and DNFBPs.

6. Burkina Faso is yet to introduce policies to address and mitigate the risks identified and assessed through the NRA. Nevertheless, a National Action Plan covering a 3-year period, has been developed. The National Action Plan which prioritizes and covers the key areas of deficiencies identified, incorporates the expected results, the implementation schedule for each activity and the tasks duly assigned to each stakeholder institution, is awaiting approval of the authorities.

7. The TF risk is classified as medium high in the NRA. Given the terrorist attacks within the country as well as the porous borders and large size of the informal sector, the authorities should pay greater attention to this risk.

8. The institutional mechanism for national cooperation and coordination has been established under the auspices of the CNCA AML/TF. The FIU and the criminal investigation and prosecutorial authorities generally cooperate. There is also operational collaboration and coordination among the regulatory and supervisory authorities of FIs (banks, DFIs, insurance companies, stock markets) within the framework of the UEMOA Financial Stability Committee. But the AML/CFT aspect is barely taken into account. However, the coordination and cooperation system as a whole is beset by a low level of collaboration. Specifically, the exchange of information between FI supervisory authorities and the FIU is very limited.

C.2 Financial intelligence, money laundering and confiscation (Chapter 3 - IOs. 6-8; R. 3, R. 4, R. 29-32)

¹ Order N°2017-0049/MINEFID/CENTIF of 25 September, 2017

9. Burkina Faso has established a Financial Intelligence Unit (FIU), which is already operational. It receives, analyses and disseminates financial information to relevant competent authorities, including criminal prosecution authorities. Suspicious transaction reports received from reporting entities, particularly financial institutions, as well as additional information gathered are used by the FIU to produce high quality intelligence. In spite of DFNBPs and other non-bank financial institutions' non-compliance with reporting obligations, the number of suspicious transaction reports submitted by all reporting entities has steadily increased.

10. The FIU does not have a data analysis and extraction tool, but has started developing it through in-house expertise. The implementation of the analytical device is at its final stage. The FIU's resources, particularly financial, have not increased enough to allow the Unit to fully execute its mandate.

11. The FIU is a member of the Egmont group and it cooperates and exchanges information and financial intelligence with domestic competent authorities through focal points trained to maintain confidentiality, and with foreign counterparts.

12. Burkina Faso has criminalized ML in accordance with the Vienna and Palermo Conventions. However, in practice, the criminal investigation and prosecution agencies do not typically prioritise ML investigations or conduct parallel investigations. Similarly, there is no evidence that investigations focus on the various types of money laundering activities, including third-party money laundering or laundering of proceeds from foreign predicates.

13. Criminal investigative and prosecutorial agencies have a low level of financial investigative skills and lack resources to handle money laundering cases. The absence of ML convictions is not consistent with the high level of threats associated with the multitude of predicate offences in Burkina that potentially generate significant illicit revenues. Strengthening the capacity of Criminal Investigation Department (CID) Officers in financial investigation is crucial. However, the authorities recently established specialised courts to handle economic and financial crimes and terrorism to facilitate the prosecution of ML& TF offences.

14. The legal framework for provisional measures and confiscation in Burkina Faso is generally satisfactory. Various legal instruments are used, including seizure, confiscation, fines and tax penalties, and the competent authorities have the powers required to identify, seize and confiscate assets. The Ministry of Justice has endeavoured to ensure that the competent authorities consider confiscation as a strategic objective. The Attorney-General issued a guideline in March 2017 requesting prosecutors to focus on seizure and confiscation in criminal cases in Burkina Faso, especially those related to money laundering, terrorist financing and terrorism. The confiscation of illicit proceeds derived from predicate offences is common in Burkina Faso.

15. A significant number of judges are not familiar with the concepts of money laundering and terrorism financing. Furthermore, the complexity of ML impedes the implementation of provisional measures in money laundering cases. The criminal investigative and prosecutorial authorities noted that it was easier to deal with predicate crimes, since financial investigations are often lengthy and resource-intensive. There is the need for more specific training and

guidance on the implementation of seizure and confiscation measures in ML/TF cases as the number of ML and TF seizures and confiscations does not reflect the policies and priorities of the Burkinabe authorities in this regard.

16. Burkina Faso has indicated that the country intends to establish a new agency, the National Agency in charge of the Management and Recovery of Seized and Confiscated Assets (ANAGRASC), to manage such assets.

C.3 Terrorist Financing and Proliferation Financing (Chapter 4 - IOs. 9-11; R. 5-8)

17. Burkina has been experiencing terrorist attacks since 2015. The country's authorities have a good understanding of the terrorism risk in the country and have a fairly good assessment of TF-related risks. However, the legal framework for terrorism financing is inadequate. The definition of TF offence is restricted to the financing of terrorist acts and does not cover the financing of an individual terrorist or a terrorist organization.

18. In terms of judicial prosecutions, the authorities have arrested 256 suspected terrorists and charged them with acts of terrorism and terrorist financing in 80 lawsuits. Although there have been seizures of funds linked to terrorism financing, so far, no TF-related conviction has been secured.

19. Terrorism financing is incorporated into the counter-terrorism strategy. The National Intelligence Agency (NIA) is structured in a way that facilitates exchange of information among intelligence agencies of the competent authorities, including the FIU. Regular meetings strengthen collaboration in the fight against terrorism and its financing. Investigations into terrorist financing are currently being conducted in conjunction with counter-terrorism cases. The NIA includes the financial aspect of terrorism in its surveillance strategy for high-risk groups, in order to disrupt terrorist networks. There are cases of international cooperation on terrorism financing at criminal investigative and prosecutorial agencies.

20. As a result of the threat of terrorism in recent years and the risk of terrorism financing faced by Burkina Faso, the country has developed a strategy to combat terrorist activity including terrorism financing. The strategy which highlighted the importance of coordination among intelligence agencies resulted in the adoption of legislation on terrorism and its financing, and the establishment of the specialised courts to handle cases on terrorism and terrorist financing.

21. Burkina Faso is taking steps to implement targeted financial sanctions pursuant to UNSCR 1267 and subsequent Resolutions, however, there are delays as regards implementation. Burkina Faso is yet to implement the UNSCR 1373 and has therefore not frozen any assets.

22. Burkina has enacted legislation which categorises NPOs as either associations, NGOs or foundations. This categorization is aimed at enhancing monitoring. There is however, little evidence of comprehensive monitoring of the sector. The NRA report outlined the threat level of terrorism financing through non-profit organizations as medium-low. However, the threats posed to the sector may be significant given the fact that Burkina has not carried out a

comprehensive assessment of the sector and has not conducted sustained awareness-raising and training activities within the sector.

23. Burkina Faso has the legal framework for the implementation of targeted financial sanctions related to the proliferation of weapons of mass destruction. There is however, no mechanism in place to operationalise the provisions of the law. In order to ensure monitoring of importation, transportation and use of sensitive goods, the country has introduced regulations for economic operators, particularly those in the mining industries. The country has also taken regulatory measures to ban all products from North Korea. Within the FIs, targeted financial sanctions is being implemented in the large banks however, supervision of this obligation needs to be improved and additional guidance is needed. Amongst DNFBPs, these obligations are poorly understood and implementation is almost non-existent. The country has not identified any funds or other assets of designated persons and entities to be frozen assets in accordance with United Nations Resolutions on proliferation financing. Furthermore, the level of awareness of proliferation issues among the competent authorities and most of the reporting entities is still limited.

C. 4 Preventive measures (Chapter 5 - IO. 4; R. 9-23)

24. Financial institutions, specifically banks and large DFIs demonstrated a good understanding of their risks and have adopted a risk-based approach. These institutions update their internal AML/CFT programmes and have generally strengthened their internal AML/CFT systems. Banks have developed risk mapping and action plans that include risk mitigation policies. Unlike medium and small-scaled DFIs, large DFIs understand their risks and have procedures in place to mitigate such risks. The vast majority of DNFBPs do not understand their risks.

25. With regard to the insurance sector, the NRA indicated that insurance companies have internal compliance functions. However, some had not yet conducted a risk assessment and mapping. As a result, their identification system does not permit effective monitoring of customer transactions on the basis of their profiles, or appropriate controls where such transactions are unusual and complex, or where PEPs are concerned.

26. In terms of training, large banking institutions and insurance companies have introduced in-house training including ongoing training programmes on AML/CFT.

C.5 Supervision (Chapter 6 - IO. 3; R. 26-28, R. 34-35)

27. Measures to prevent criminals and their associates from participating in the ownership, control or management of financial institutions are generally sound. Appropriate controls are conducted on both board members and management staff at the time when a financial institution is being established and throughout its existence. There is no designated authority for AML/CFT supervision of DNFBPs. Although, some DNFBPs are licensed and regulated by self-regulating bodies however, the regulation and monitoring do not generally take account of the AML/CFT aspect.

28. The banking sector's regulatory authorities (BCEAO, UMOA Banking Commission and Ministry of Finance) have adequate and consistent understanding of ML/TF risks in the sector, unlike the regulatory authorities of other financial institutions. Risk-based supervision in both the banking and insurance sectors has been implemented. The Banking Commission has introduced the Credit Institutions Rating System, which allows it to conduct risk-based monitoring. However, the Commission should incorporate AML/CFT-related aspects into their rating system. Also, the UMOA Financial Stability Committee should take into account AML/CFT aspects in its analysis of the financial system as a whole.

29. Off-site AML/CFT-related inspections in the banking sector are regular and stable while onsite inspections are limited, within the banking sector and inadequate in other financial institutions² and non-existent in DNFBPs. Strengthening the human capacities and financial resources of Supervisors, is a major factor in ensuring adequate supervision of reporting entities.

30. The legal and regulatory frameworks governing AML/CFT supervision are acceptable and have a wide range of administrative, monetary and criminal sanctions for non-compliance with AML/CFT requirements. However, such sanctions, with the exception of injunctions, are seldom used in practice. Besides, such injunctions are not transmitted to either the FIU or the State Prosecutor, contrary to the provisions of Article 112 of the AML/CFT Act. The dissuasive, proportionate and effective nature of such sanctions could not be established.

C.6 Transparency of legal persons and legal arrangements (Chapter 7 - IO. 5; R. 24-25)

31. The OHADA provisions define the framework for the establishment of various types of companies in Burkina Faso. The public can access basic information on legal persons from the register at the Commercial Court, at the website of the RCCM and through certain other competent authorities. However, the information on the website is not easily accessible due to the low level of efficiency of the systems in place for enquires and queries. The information at the Commercial Court is stored manually in different locations and access is not always on a timely basis. The OHADA law requires companies to update basic information. However, there was no enforcement of this requirement and the sanctions for breach of this requirement were put in place recently. The National ML/TF Risk Assessment did not focus on the ML/TF risks associated with the various types of legal entities established in Burkina.

32. With regard to legal arrangements, Burkina does not recognise the establishment of trusts under its laws. However, the AML/CFT Act 016 requires professional Trust and Company Service Providers to maintain information on some of the parties to a trust.

33. With regard to beneficial ownership information, in spite of the legal obligation provided for in Act No. 016-2016 of 3rd May 2016, which requires reporting entities to collect beneficial ownership information, there are challenges with obtaining this information and law enforcement agencies do not typically approach the banks for this information.

C.7 International cooperation (Chapter 8 - IO. 2; R. 36-40)

² Particularly MVTS, Authorized foreign exchange dealers and Electronic currency companies

34. Burkina Faso provides assistance to countries that so request. The central authority in charge of managing mutual legal assistance in Burkina Faso is the Criminal and Legal Affairs Department (*Direction Nationale des Affaires Pénales et du Sceau*). As regards the timeframes for responding to these requests, some judicial authorities indicated that the processing time for a case was two months, while others were unable to provide any specific timeline. Nevertheless, the countries that have engaged in international cooperation with the Burkinabe authorities indicated that cooperation is generally satisfactory. Burkina Faso is generally satisfied with the cooperation it receives, although the authorities have noted that some countries in the region have not responded to requests for assistance.

35. Cooperation between criminal investigation and prosecution agencies is mainly through the INTERPOL platform. Information requests are also addressed directly to the specialised agencies, such as the anti-corruption agency. The Police and Gendarmerie Criminal Investigation Department from time to time organize joint investigations on predicate offences. However, the number of ML and TF-related mutual assistance requests is modest.

36. The FIU cooperates internationally through the "Egmont Secure Web" and on the basis of bilateral agreements with countries that are not members of the Egmont Group.

37. The Banking Commission collaborates with foreign supervisory authorities through Memoranda of Understanding on cooperation and information exchange. Joint home and host country inspections are provided under such Memoranda of Understanding.

D. Priorities

38. In light of the foregoing general findings, the priority actions recommended for Burkina Faso are as follows:

- Ensure the NRA report is disseminated to all relevant stakeholders in the public and private sectors, develop a national AML/CFT policy based on the risks identified in the NRA, map out a timeline for the regular updating of the NRA and improve the scope of future assessments, particularly by: incorporating the livestock trade, legal persons and arrangements and a more comprehensive assessment of NPOs.
- Strengthen national cooperation and coordination on AML/CFT by sensitizing all relevant institutions and stakeholders on the role of each institution and ensure that nonbank FI and DNFBP sectors and their respective supervisory authorities have a better understanding of ML/TF risks in their sectors.
- The FIU should sensitize revenue and customs administrations, nonbank FIs and DNFBPs on the indicators for suspicious transactions and their obligation to report suspicious transactions to the FIU. The FIU should acquire more sophisticated analytical tools for data validation, data exploration or any other automated processing of STRs and other information received.
- Strengthen the capacities of magistrates, particularly the prosecutors and LEAs, including the judicial police and the gendarmerie on financial investigations, particularly AML-related investigations: increase the human and financial resources of

investigative and prosecutorial authorities, to allow them to conduct parallel investigations systematically.

- Law Enforcement Agencies and Presiding Magistrates should be provided with appropriate resources and training to enable them adequately locate, freeze, seize and confiscate proceeds and instrumentalities of crime. Establish a manual of procedures for confiscation and implement the confiscation policy, establish an asset management agency to effectively management confiscated assets.
- Ensure that priority is given to terrorist financing and adapt the counter-financing of terrorism strategy in order to address the growing risks of terrorism in the country and region. Strengthen the capacities of judicial officers and other competent officers dealing with terrorism and terrorist financing matters and fast-track the prosecution of all pending TF cases.
- Strengthen the mechanism for implementing targeted financial sanctions pursuant to the UNSCRs by ensuring that the CCGA is fully operational. In addition, provide specialized training to the private sector to enhance the understanding of the TF risks /TF indicators; raise awareness on the obligation to implement targeted financial sanctions related to TF and PF, and establish a comprehensive framework for the monitoring and supervision of financial institutions and DNFBPs to ensure compliance with TFS requirements.
- Ensure financial institutions other than large banks and DFIs comply with their AML/CFT obligations, particularly by conducting risk mapping exercises and implementing risk-mitigating measures. Furthermore, the country should strengthen the capacities of these entities through training and sensitization. In addition, Burkina should enforce regulations requiring DNFBPs to implement AML/CFT measures.
- Burkina Faso should designate an authority or authorities responsible for monitoring implementation of AML/CFT requirements among DNFBPs, with sufficient powers to conduct inspections and apply sanctions. In addition, the country should ensure that self-regulatory authorities regulate and monitor the implementation of AML/CFT measures. Supervisory authorities for FIs should increase the frequency of AML/CFT on-site inspections and ensure that sanctions are applied for non-compliance with AML/CFT requirements.
- Put in place measures, including oversight measures and enforcement action, to ensure that basic information available at the RCCM is adequate, accurate, current and accessible in a timely manner and ensure that and beneficial ownership information is available and easily accessible.
- Burkina should use the mutual legal assistance mechanism more rigorously when conducting investigations on ML/TF or proceeds generating domestic predicates that are transnational in nature. Competent authorities should implement a case management system that monitors requests.

Ratings for Effectiveness and Technical Compliance

Level of effectiveness (High, Significant, Moderate, Low)

IO.1- Risks, policies and coordination	IO.2 - International cooperation	IO.3 - Supervision	IO.4 - Preventive measures	IO.5 - Legal persons and legal arrangements	IO.6- Financial Intelligence
Low	Moderate	Low	Low	Low	Moderate
IO.7 - Investigations and prosecutions for money laundering	IO.8 - Confiscation	IO.9 - Investigations and prosecutions for terrorism financing	IO.10 - Preventive measures and financial sanctions for terrorism financing	IO.11 - Financial sanctions for proliferation financing	
Low	Low	Low	Low	Low	

Level of technical compliance (C – Compliant, LC – Largely compliant, PC –Partially complaint, NC – Non-compliant)

R.1 - Risk assessment and application of risk-based approach	R.2 - National cooperation and coordination	R.3 - Money laundering offence	R.4- Confiscation and provisional measures	R.5- Terrorist financing offence	R.6 - Targeted financial sanctions linked to terrorism and terrorism financing
LC	PC	C	LC	PC	PC
R.7 - Targeted financial sanctions linked to proliferation	R.8 Non-profit Organization	R.9- Financial institutions professional secrecy laws	R.10- Customer due diligence	R.11-Record keeping	R.12 - Politically exposed persons
PC	PC	C	LC	LC	LC
R.13- Correspondent banking	R.14 - Money or value transfer services	R.15 - New technologies	R.16- Electronic transfers	R.17- Use of third parties	R.18 - Internal controls and foreign branches and subsidiaries
LC	PC	C	LC	LC	LC
R.19- Higher risk countries	R.20- Suspicious transaction reporting	R.21- Disclosure and confidentiality	R.22- Designated non-financial businesses and professions: customer	R.23- Designated non-financial businesses and professions: other measures	R.24-Transparency and beneficial ownership of legal persons

			due diligence		
PC	LC	C	PC	LC	PC
R.25- Transparency and beneficial ownership of legal arrangements	R.26-Regulation and supervision of financial institutions	R.27- Powers of supervisory authorities	R.28- Regulation and supervision of designated non-financial businesses and professions	R29- Financial intelligence unit	R.30- Responsibilities of criminal prosecutorial and investigative authorities
PC	PC	C	NC	C	C
R.31 - Powers of criminal prosecutorial and investigative authorities	R.32 - Cash couriers	R.33- Statistics	R.34- Guidance and feedback	R.35- Sanctions	R.3 - International instruments
C	PC	LC	PC	LC	C
R.37 - Mutual legal assistance	R.38 - Mutual legal assistance: freezing and confiscation	R.38- Mutual legal assistance: freezing and confiscation	R.40 - Other forms of international cooperation		
LC	LC	LC	LC		