

## Current list of high risk "Third Countries" with strategic deficiencies re Money Laundering and Terrorism Financing

Based on this EU regulation all obliged parties under AML law have to fulfill at least increased due diligence obligations for all countries listed in category 2

Re. countries from category 1 they have to set up additional measures and fulfill enhanced due diligence obligations according to § 15 Abs. 5 GwG

Re. all countries from category 3 and 4 normal customer due diligence obligations apply. They have to be supplemented on a case-by-case basis by measures reflecting the special risk.

Enhance due diligence obligations acc. to § 15 pass. 5 GwG (only in german)

<u>Documents - Financial Action Task Force (FATF) (fatf-gafi.org)</u>

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asis Category Country	Country full name	Consequences	Comment
OR 1 Iran	Demokratische Volksrepublik	High-Risk Jurisdictions subject to a Call for Action	=> Enhanced efforts to identify the ultimate beneficial owner (uBO);  Each financial transaction to/from these countries affected, espec. "one of our clients";  Decision on supicious activity report has to be executed by a member of management
HOI III KOICU	Nordkorea		
OR 2 Afghanistan  Barbados Burkina Faso		Jurisdictions under Increased Monitoring	=> At least enhanced customer due diligence obligations acc. to § 15 Abs 5 GwG if contracting party, uBO or other person involved comes from or has its residence in a High Risk Country or bank account from HRC is involved that means in detail:  - Complete Identification of the ultimate Beneficial Owner acc. to § 11 pass. 4 Nr. 1 and 2 GwG
Cayman Islands Cameroon Congo Gibraltar Haiti Jamaica Jordan Mali Mozambique Myanmar Nigeria Panama Philipines Senegal South Africa South Sudan Syria Tanzania Trinidad & Tobago UAE Uganda Vanuatu Vietnam Yemen	Democratic Republic of Congo  United Arab Emirates	The following countries were currently amended according FATF recomendation:  - Cameroon - Nigeria - South Africa - Vietnam  The following countries were effaced compared to last version: - Cambodscha - Morocco  Countries listed below were not included from the last recommendations of the FATF: - Bulgaria / Croatia / Turkey - Keniya / Namibia  These countries have not been effaced although FATF has done so in its latest recommendations: - Cayman Islands / Jordan / Panama - Barbados / Gibraltar / UAE / Uganda	- Company has to safeguard that subsidiaries and local branches also guarantee compliance with this measures  - Obtain additional information about:  - Contracting party and beneficial owner  - Intended kind of business  - Source of funds of the contractual partner  - Source of funds of the beneficial owner  - Reasons for the planned or carried out transaction  - Projected usage of funds  - Foundation/Continuation of business relationship needs approval from member of management  - Increased monitoring of the business relationship  - through more and intensified checks  - through analysis of transaction types, that need further investigation  - Documentation of according measures and analyses  - Moreover the supervising authority can enforce additional due diligence obligations acc. To  § 15 pass. 5a GwG - currently: Afghanistan - Consideration of current situation
Channel Islands Channel Islands China Malta Russia Turkey Cyprus	Cayman Islands, British Virgin I., Bermuda Guernsey, Jersey, Isle of Man	Countries with a higher risk of money laundering - assessment through Ministry of Finance / National Risk Analysis	=> Adequate consideration of the special risks necessary => Attention: Some supervising authorities in the non-financial sector consider increased due diligence obligations necessary also for these countries!
ATF 4 Bulgaria Croatia		Additional countries, for which FATF (Financial Action Task Force ) states deficits  Countries below newly enclosed in FATF recommendations in 2023 and Feb 2024 (but not yet included in CDR):  - Bulgaria / Croatia / Turkey  - Kenjay / Namibia	=> For real estate the "GwGMeldV-Immobilien" applies! No direct to do's to consider but adequate consideration of t involved special risks (i.e. annual review of contract partner)

FATF Statement "Jurisdictions subject to a Call for Action" of 23th February 2024

FATF Statement "Jurisdictions under Increased Monitoring" of 23th February 2024