

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 \(only in german\)](#)

Basis	Category	Country	Country full name	Consequences	Comment
CDR	1	Iran		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 suspicious activity report has to be executed by a member of management
		North Korea	Democratic Republic of North Corea		In addition obliged entities from the financial sector (with BaFin as regulating authority) have to fulfill reporting duties if they have business relations or make transactions with connections to Iran and North Korea (s. Link below). BaFin announced, that FATF requested countries to terminate correspondence-banking relationships with North-korean Banks and to close subsidiaries and local branches from north-korean banks in their countries as well as restrict business relationships and transactions with persons from North Korea
CDR	2	Afghanistan		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 - Company has to safeguard that subsidiaries and local branches also guarantee compliance with this measures
		Algeria Angola Bolivia Brit. Virgin Islands Cameroon Congo Cote d'Ivoire Haiti Kenya Laos Lebanon Monaco Myanmar Namibia Nepal South Sudan Syria Trinidad & Tobago Vanuatu Venezuela Vietnam Yemen	Democratic Republic of Congo	The following countries were amended without recommendation of FATF: - Russia CDR 2026/46 03.12.2025 The following countries were currently amended according latest FATF recommendation: - Bolivia / British Virgin Islands The following countries were effaced compared to last version: - Burkina Faso / Mali / Mozambique / Nigeria / South Africa / Tanzania Countries listed below were not included from the last recommendations of the FATF: - Kuwait / Papua New Guinea These countries have not been effaced although FATF has done so in its latest recommendations: -	- 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 - 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
NRA	3	Caribic Islands	Cayman Islands, British Virgin I., Bermuda	Countries with a higher risk of money laundering - assessment through Ministry of Finance / National Risk Analysis	=> Adequate consideration of the special risks necessary
		Channel Islands China Malta Russia Turkey Cyprus	Guernsey, Jersey, Isle of Man		=> Attention: Some supervising authorities in the non-financial sector consider increased due diligence obligations necessary also for these countries!
FATF	4	Bulgaria Kuwait Papua New Guinea		Additional countries, for which FATF (Financial Action Task Force) states deficits	=> For real estate the "GwGMeldV-Immobilien" applies! Not automatically enhanced customer due diligence but adequate consideration of the involved special risks (i.e. consideration in risk analysis, adjustment of internal safeguards, annual review of contract partner)
				Countries below newly enclosed in FATF recommendations recently (but some not (yet) included in DCR): - Kuwait / Papua New Guinea - Bulgaria / Kenya / Laos / Lebanon - Monaco / Namibia / Nepal / Venezuela These countries have been effaced in comparison with earlier versions: - Barbados / Croatia / Gibraltar / Jamaica / Mali / Senegal / Tanzania / Turkey / UAE / Uganda	

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Basis: CDR (EU) 2016/1675 of 14th July 2016, last updated via CDR (EU) 2026/83 of 4th December 2025 (and CDR 2026/46)
BaFin Circular 13/2025 (GW) of 01th December 2025
FATF Statement "Jurisdictions subject to a Call for Action" of 13th February 2026
FATF Statement "Jurisdictions under Increased Monitoring" of 13th February 2026
Bafin General Decree Reporting Duties re. Transactions/Business Relationships to North Korea
Bafin General Decree Reporting Duties re. Transactions/Business Relationships to Iran

[CDR EU commission 2026/83](#)
[BaFin - Circular 2025/12/01 \(GW\)](#)
[Documents - Financial Action Task Force \(FATF\) \(fatf-gafi.org\)](#)
[Documents - Financial Action Task Force \(FATF\) \(fatf-gafi.org\)](#)
[BaFin - Publikationen & Daten - Allgemeinverfügung zur Anordnung einer Meldepflicht bei ...](#)
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[CDR EU commission 2026/46](#)



§ 15 GwG Increased customer due diligence

Pass. 2 – increased due diligence either according to own risk analysis or on a case-by-case basis by means of risk factors Annex 1/2

Pass. 3 higher risk especially if

1. Political exposed Person (PeP)
2. **Third Country** (all non-EU countries)
3. Transaction is complex, has exceptional volume or unusual structure or no commercial reason
4. Cross border correspondent relationship with banks, insurers or insurance broker with respondent (Bank, Insurer, Broker) from third country

Pass. 4 if reason is due to own risk analysis acc. to pass. 2 or PeP pass. 3.1, => **at least** increased customer due diligence obligations

- Establishment/Continuance of business relation only with approval of member of management
- Adequate measures to identify source of funds
- Increased monitoring of business relationship

Pass. 5 if acc. to Pass. 3 No. 2 Third Country => **at least** increased customer due diligence obligations

1. Obtain additional information
 - Re. Contractual party and beneficial owner
 - Re. Type of business relation
 - Information about source of funds and source of wealth of contracting party
 - Information about source of funds and source of wealth of beneficial owner
 - Information about reasons for projected transaction
 - Information about proposed usage of funds
2. Establishment/Continuance of business relation only with approval of member of management
3. Increased monitoring of business relationship via
 - Frequent and more intensive checks
 - Selection of transaction patterns that need further examination

Pass. 5a if Pass. 3 No. 2 Third Country - Supervising authorities may demand additional obligations re. customer due diligence

1. Report of financial transactions to the FIU
2. Restriction or interdiction of business relationship
3. Prohibition for third country parties to set up local branches or subsidiaries in Germany
4. Prohibition to set up local branches or subsidiaries in high risk countries
5. Obligation for local branches/subsidiaries abroad to undergo increased examination