Annex of Circular CSSF 22/822 (Version of 4 November 2026)

I. High-risk jurisdictions for which FATF requires the application of enhanced due diligence and, where appropriate, counter-measures

("Black list")

Jurisdiction	Description	Required measures
The following jurisdictions currently have significant strategic deficiencies in their regimes to counter money laundering, terrorist financing, and financing of proliferation. For all countries identified as high-risk, the FATF calls its members and urges all jurisdictions to apply enhanced due diligence, and, in the most serious cases, countries are called upon to apply countermeasures.		
Democratic People's Republic of Korea ("DPRK")	The FATF maintains its position that the AML/CFT regime of the DPRK continues to have substantial and strategic deficiencies, and remains concerned by the serious threats posed by its illicit activities related to the proliferation of weapons of mass destruction and its financing. Therefore, the FATF maintains its call to apply effective **counter-measures** against the DPRK. Moreover, the FATF reiterates that the jurisdictions must: i) take measures to terminate correspondent relationships with DPRK banks; ii) close existing subsidiaries, branches or representative offices of DPRK banks; and, iii) limit business relationships and financial transactions with DPRK persons.	Professionals continue **taking into account the risks** arising from the deficiencies of the AML/CFT regime of the DPRK, including the fight against the financing of weapons of mass destruction proliferation, and to give special attention to business relationships and transactions with this jurisdiction, including with companies and financial institutions from this jurisdiction and those acting on their behalf. Professionals apply in these cases **enhanced due diligence and monitoring measures** in order to **avoid** these business relationships **being used to bypass or evade** the application of enhanced measures and counter-measures. Professionals **inform the CSSF** in case of a **correspondent banking relationship** with a credit institution from the DPRK. Professionals maintain **enhanced mechanisms for reporting suspicious activity** to the Financial Intelligence Unit ("FIU").
Iran	In June 2016, Iran committed to address its strategic AML/CFT deficiencies. The Action Plan set by the FATF expired while the remaining deficiencies had not been fully addressed yet. Therefore, the FATF required in its October 2019 Plenary meeting: the implementation of increased supervision with respect to subsidiaries and branches of financial institutions based in Iran; the application of enhanced control measures, including enhanced mechanisms for reporting suspicious transactions or systematic reporting of financial transactions; and the assurance of increased external audit for financial groups with respect to their subsidiaries and branches located in Iran. Even though Iran has made limited progress on technical compliance in 2026 - by developing a framework to receive international asset freezing requests -, it has not fully addressed the remaining deficiencies, impelling the FATF to call on Iran to remove any possibility of exceptions or other limitations to its terrorist financing offence and targeted financial sanctions regime that are not in line with the FATF Standards and international obligations. In particular, until Iran implements the measures required to address the deficiencies identified in the Action Plan, the FATF remains concerned with the terrorist financing and proliferation financing risk emanating from Iran and the threat this poses to the international financial system, primarily due to Iran's lack of compliance with its nuclear non-proliferation obligations, and to its reservations to several United Nations conventions. The FATF reitarates its call upon all jurisdictions to implement **counter-measures** that are effective and proportionate to the risks emanating from this jurisdiction, including: i) refusing the establishment of subsidiaries or branches or representative offices of financial institutions ("FIs") and virtual asset service providers ("VASPs") from Iran or otherwise taking into account the fact that the relevant FI or VASP is from a country that does not have adequate AML/CFT systems; ii) prohibiting FIs and VASPs from establishing branches or representative offices in Iran, or otherwise taking into account the fact that the relevant branch or representative office would be in a country that does not have adequate AML/CFT systems; iii) on a risk basis, limiting business relationships or financial transactions, including virtual asset transactions, with Iran or persons in the country concerned; and iv) prohibiting FIs and VASPs from establishing new correspondent relationships and requiring them to undertake a risk-based review of existing correspondent relationships with FIs and VASPs in the country concerned. While applying these countermeasures, countries should ensure that flows of funds involving humanitarian assistance, food and health supplies, diplomatic operating costs, and personal remittances are appropriately handled on a risk basis considering the terrorist financing or proliferation financing risks emanating from Iran, in line with international obligations. The FATF will continue to assess the progress made by Iran and take appropriate measures by deciding, as the case may be, whether to reintroduce the suspension of counter measures or conversely, to take additional next steps. Iran will remain on this list until the	Professionals continue **taking into account the risks** arising from the strategic deficiencies of the AML/CFT regime of Iran and to give special attention to business relationships and transactions with this jurisdiction, including with companies and financial institutions from this jurisdiction and those acting on their behalf. Professionals apply in these cases, as well as in correspondent banking relationships, **enhanced due diligence and monitoring measures** with respect to these business relationships in order to **avoid** these business relationships **being used to bypass or evade** the application of enhanced measures and counter-measures. Professionals **increase the number and timing of controls** applied, select patterns of transactions that need further examination and obtain information, particularly, on the reasons for the intended transactions. Professionals **inform the CSSF** (i) in case of a correspondent banking relationship with a credit institution from Iran and (ii) in case of use of a third party located in Iran and conducting elements of the due diligence process (third-party introducers and/or outsourcing). Professionals maintain **enhanced mechanisms for reporting suspicious activity** to the FIU.
Myanmar	In February 2020, Myanmar committed to address its strategic deficiencies. As Myanmar's action plan expired in September 2021 and given the continued lack of progress and the fact that the majority of the action items have not been addressed, the FATF required at its October 2022 Plenary meeting the application of **enhanced due diligence measures** proportionate to the risks arising from Myanmar, while ensuring that these measures do not disrupt the flows of funds for humanitarian assistance, legitimate non-profit organisations activity and remittance services. Even though Myanmar has taken some steps to tackle fraud and cyber scam operations, Myanmar will remain on the list of countries subject to a call for action until its action plan is fully completed, in particular with regard to taking appropriate action to address the illicit finance risks associated with fraud and cyber scam threats. If no further progress is made by **February 2027**, the FATF will consider countermeasures.	Professionals continue **taking into account the risks** arising from the strategic deficiencies of the AML/CFT regime of Myanmar and give special attention to business relationships and transactions with this jurisdiction, including with companies and financial institutions from this jurisdiction and those acting on their behalf. Professionals maintain **enhanced mechanisms for reporting suspicious activity** to the FIU.

II. Jurisdictions under increased monitoring of the FATF

("Grey list")

Jurisdiction	Required measures
The following jurisdictions currently have strategic ML/TF/PF deficiencies for which they have developed an Action Plan with the FATF to address the deficiencies (the newly added countries are highlighted)	
Angola	
Bolivia	
Bosnia and Herzegovina	
(British) Virgin Islands	
Cameroon	
Haïti	
Iraq	
Kenya	
Kuwait	
Lao PDR	
Lebanon	
Nepal	
Papua New Guinea	
South Sudan	
Syria	
Venezuela	
Vietnam	
Yemen	
The following jurisdiction(s) are no longer subject to the FATF's increased ongoing monitoring process but will continue working with the FATF/FATF-style regional body	
Bulgaria	
Côte d'Ivoire	
Democratic Republic of the Congo	
Monaco	