



**World Bank**

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**DETAILED ASSESSMENT QUESTIONNAIRE  
ANTI-MONEY LAUNDERING AND COMBATING THE  
FINANCING OF TERRORISM**

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***[NAME OF COUNTRY]***

**QUESTIONNAIRE TEMPLATE**

**[Date]**

## **Introduction**

- i. This questionnaire is the means by which the authorities in the country<sup>1</sup> being evaluated can provide all the detailed input to the assessment process prior to the on-site mission. This input should primarily describe the measures that are currently in place, including the implementation measures and the results obtained. Countries should also describe measures or changes which are not yet in place, but which they plan to implement – these measures should be clearly delineated from those that are in place at the time of the on-site visit. Finally, authorities may also set out any additional analysis or commentary that they believe would assist the assessors in carrying out the assessment e.g. their analysis of the effectiveness of the measures in place.
- ii. This standard questionnaire was agreed at the FATF Plenary meeting in June 2004, and copies were made available to all FATF members and observers, including all FATF-style regional bodies, the OGBS and the IMF and the World Bank. If a country does not have the questionnaire for assessments, it should be sent to the country for completion as soon as possible, and in any event, at least five (5) months prior to the on-site mission (where this is possible).
- iii. The questionnaire should be comprehensively completed and returned at least two (2) months prior to the commencement of the on-site mission. It is essential that the material be provided by this date if the necessary preparatory work is to be done. The questionnaire response should be accompanied by copies of all relevant laws, regulations, guidelines and other material referenced in the response (both in the language of the country and the language of the assessment). All documents should be supplied in the agreed language of the assessment.

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<sup>1</sup> All references to “country” also include territories or jurisdictions.

# **QUESTIONNAIRE FOR AML/CFT ASSESSMENTS**

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The country being evaluated should provide responses for each section of the questionnaire in the manner set out below.

## **1. SECTION 1**

### **1.1 General information on the country and its economy**

1. In section 1.1, countries should provide general information on the country and the economy. Other information that could be relevant would be a short summary addressing the six structural elements referred to in paragraph 7 of the AML/CFT Methodology 2004, or notable deficiencies in pre-conditions for an effective AML/CFT framework. In certain countries it may also be relevant to include summarised information on the level of development of the jurisdiction and other factors that affect the development and implementation of an AML/CFT framework.

### **1.2 General Situation of Money Laundering and Financing of Terrorism**

2. This section provides background information on the types of predicate offences that are generating illegal proceeds that are laundered (whether those offences are domestic or foreign), any estimates of the amount of money being laundered, and the methods, techniques and trends that have been observed regarding the laundering. Information should also be provided on any terrorist activity that has occurred within the country, and on the sources and methods used to finance terrorist activity. Any specific matters of concern or vulnerability should be highlighted. The following questions should be answered:

(a) What crimes or types of crime are considered to be the major sources of illegal proceeds in your jurisdiction? Please describe briefly the current situation and trends regarding such crimes e.g. how serious a money laundering problem they represent; any order of magnitude estimate you can provide of the scale of proceeds generated; whether the incidence of such crimes is increasing or declining, and whether the proceeds come from domestic or foreign predicate offences.

Please provide, if possible, available statistical data on the numbers of prosecutions and convictions for serious offences, by offence type, for the last four (4) years. This will help the assessors to have an overview of your crime situation generally. For offences that result in economic loss or damage please indicate (if figures are available) the total economic loss or damage resulting from these offences.

(b) Describe the present money laundering situation in your jurisdiction, and how it has changed (if at all) in the last four (4) years? What do you consider your most important money laundering problem? Do you anticipate any changes in the money laundering threat in the foreseeable future? In your description, please provide the following types of information:

- a. the number of cases of money laundering or suspected money laundering;
- b. the most common ways in which the money is laundered;
- c. the types of financial institutions, DNFBP or other businesses used;

- d. the types of groups involved in laundering operations;
- e. whether the pattern of money laundering has changed following the introduction of anti-money laundering measures.)

(c) Describe the present terrorist financing situation in your country and how it has changed (if at all) in the last four (4) years? Do you anticipate any changes in the methods or techniques that will be used in the foreseeable future? In your description, cover any cases of actual or suspected terrorist financing which have come to light; the source of the funds (including whether legal or illegal), the ways in which the funds were provided to the terrorists and how they were used, the types of institutions used, and the groups involved). Advise whether the terrorist financing techniques and trends have changed following the introduction of counter-terrorist financing measures.

### **1.3 Overview of the Financial Sector and DNFBP**

3. Section 1.3 should contain a description of the types of financial institutions operating in the country, and listing the financial activities (see the definition of “financial institution” in the Methodology) that they engage in or are authorised to engage in. For the purposes of the FATF Recommendations, it is not necessary that a business or institution requires authorisation to be classified as a “financial institution”. Rather, this section should describe any natural or legal person that engages in a financial activity and meets the definition of “financial institution”. The section should set out information on the number and size of financial institutions, and any recent changes of significance e.g. consolidation in a particular sector.

4. There should be similar information on each of the six categories of designated non-financial businesses and professions (DNFBP) as defined in the Forty Recommendations, namely: casinos (including internet casinos); real estate agents; dealers in precious metals; dealers in precious stones; lawyers, notaries, other independent legal professionals and accountants; and trust and company service providers. The section should describe the types of activities or business that they typically engage in, or are permitted to engage in, as well as information on the number and size of these various businesses and professionals (as defined), and any recent changes of significance.

### **1.4 Overview of commercial laws and mechanisms governing legal persons and arrangements**

5. This section should contain a description of the types of legal persons and legal arrangements that can be established or created, or can own property, in the country. This may extend to types of legal persons and arrangements that cannot be created within the country but which are recognised for purposes such as holding bank accounts or real estate, owning shares or conducting financial transactions. The country should provide basic information on:

- (a) how such legal persons or arrangements are created or established or are otherwise recognised e.g. what formal documents are required;
- (b) the basic characteristics of such entities e.g. who has ownership (for example shareholders, which could be legal or natural persons) and control (e.g. directors), do they require a registered office or agent etc.;
- (c) whether they are registered, what types of information must be provided for the register (in particular, information on ownership and control), and whether this is public information; and

(d) what types of information concerning its ownership and control must be maintained by the entity itself, who has access to this information and must it be retained in the country where it is created or established or owns property.

## **1.5 Overview of strategy to prevent money laundering and terrorist financing**

6. This section should provide a high-level overview of the country's AML/CFT efforts, and in particular the policy objectives and any progress that has been made since the last assessment. It not necessary to give an overview of the whole system, as all the legislative and other components are described in detail below, and the executive summary of the MER will provide this overview. It should include identification of the authorities, bodies and institutions with AML/CFT responsibilities within the country and a summary of historical developments. The responses to the questions below will help to provide a substantial basis for completing this section.

### ***a. AML/CFT Strategies and Priorities***

i. What are the current control policies and objectives of your government for combating money laundering or terrorist financing? Describe which aspects of the anti-money laundering policies and/or programmes have the highest priority? Why?

ii. Have you measured the effectiveness of your policies and programmes? If so, describe how this was done, and what the results are.

iii. Describe any new initiatives that your government is planning for combating money laundering or terrorist financing?

### ***b. The institutional framework for combating money laundering and terrorist financing***

Describe briefly the roles and responsibilities of the various governmental and non-governmental authorities or organisations in detecting, preventing, and taking repressive action in relation to money laundering and terrorist financing, both at the national level and sub-national levels (e.g. state or provincial) if applicable, highlighting any recent changes. This also includes Ministries or bodies involved in setting AML/CFT policy. For example:

#### Ministries

- Ministry of Finance.
- Ministry of Justice, including central authorities for international co-operation.
- Ministry of Interior.
- Ministry of Foreign Affairs.
- Ministry responsible for the law relating to legal persons and arrangements.
- Committees or other bodies to co-ordinate AML/CFT action.

#### Criminal justice and operational agencies

- The financial intelligence unit (FIU).
- Law enforcement agencies including police and other relevant investigative bodies.
- Prosecution authorities including specialised confiscation agencies.
- Customs service.

- If relevant - specialised drug agencies, intelligence or security services, tax authorities.
- Task forces or commissions on ML, FT or organised crime.

#### Financial sector bodies

- Ministries or agencies responsible for licensing, registering or otherwise authorising financial institutions.
- Supervisors of financial institutions, including the supervisors for banking and other credit institutions, insurance, and securities and investment.
- Supervisors or authorities responsible for monitoring and ensuring AML/CFT compliance by other types of financial institutions, in particular bureaux de change and money remittance businesses.
- Exchanges for securities, futures and other traded instruments.
- Central Bank.

#### DNFBP and other matters

- Casino supervisory body.
- Supervisor or other competent authority, or SRO, for DNFBP.
- Self-regulatory organisations (SRO) for professionals such as lawyers, notaries and accountants.
- Registry for companies and other legal persons, and for legal arrangements (if applicable).
- Mechanisms relating to non-profit organisations.
- Any other agencies or bodies that may be relevant.

*c.* Please provide an overview of any policies and procedures that your authorities have adopted in applying a risk-based approach to combating money laundering and terrorist financing. The overview should describe the authorities' overall philosophy towards a risk-based approach (e.g. does it form an integral part of its regulatory framework?), and should indicate how the relevant risk assessments are undertaken to help determine the policy and its practical application. Finally, there should be a description of the mechanism by which any permitted variations from the generally applicable standards are promulgated, and what arrangements, if any, are in place to monitor the continuing suitability of the exceptions.

#### *d. Progress since the last mutual evaluation or assessment*

Where a country has undergone a previous mutual evaluation or detailed assessment, the country should summarise the key findings and/or recommendations that were made in the previous report (a copy of which should be made available to assessors), and set out the measures that the country had taken to address the recommendations in the period up to the date of the on-site visit or immediately thereafter.

### **1.6 Statistics to assess the Effectiveness of the Implementation of the AML/CFT Measures (see also Recommendation 32)**

7. This section is designed to collect relevant information and data to allow examiners to assess the effectiveness of the implementation of the FATF 40+8 Recommendations. All the statistics requested below should be provided on an annual basis for each of the last four (4) years, or where the requirements came into effect more recently, then since that time:

(a) Suspicious transaction reports, and other reports where appropriate under domestic law, received and disseminated -

- STR received by the FIU (if the system collates the necessary data, indicate both the number of individual reports of suspicious transactions received and the number of files that these reports relate to e.g. an institution could file multiple reports on one suspicious customer), including a breakdown of the type of financial institution, DNFBP, or other business or person making the STR;
- Breakdown of STR analysed and disseminated;
- Reports filed on: (i) domestic or foreign currency transactions above a certain threshold, (ii) cross border transportation of currency and bearer negotiable instruments, or (iii) international wire transfers; and number of sanctions imposed for failure to comply; and
- If known, suspicious transaction reports resulting in investigation, prosecution or convictions for ML, FT or an underlying predicate offence.

(b) ML & FT investigations; prosecutions and convictions, and on property frozen; seized and confiscated -

- ML and FT investigations, prosecutions, and convictions;
- If known, the criminal sanctions applied to persons convicted of ML and TF offences;
- The number of cases and the amounts of property frozen, seized, and confiscated relating to (i) ML, (ii) FT, and (iii) criminal proceeds;
- The number of persons or entities and the amounts of property frozen pursuant to or under U.N. Resolutions relating to terrorist financing.

(c) Mutual legal assistance or other international requests for co-operation -

- All mutual legal assistance and extradition requests (including requests relating to freezing, seizing and confiscation) that are made or received, relating to ML, the predicate offences and FT, including the nature of the request, whether it was granted or refused (if known, please set out the reasons for refusing), and the time required to respond;
- Other formal requests for assistance made to or received by the FIU from foreign counterparts, including whether the request was granted or refused; O
- Spontaneous referrals made by the FIU to foreign authorities; and S

(d) Other action -

- On-site examinations conducted by supervisors relating to or including AML/CFT and any sanctions applied;
- Formal requests for assistance made or received by supervisors relating to or including AML/CFT, including whether the request was granted or refused (including the reasons for refusing); and

## 2. SECTIONS 2 – 7

In each part of the sections below countries should complete the Description component as set out in the table. They may also out provide any additional analysis or commentary that they believe would assist the assessors in carrying out the assessment.

Description (mandatory)	<p>A detailed description of the laws, regulations and other measures currently in place that are relevant to the section and to the Recommendation, including the implementation measures and the results obtained. Countries should also describe measures or changes which are not yet in place, but which are planned - these measures should be clearly delineated from those that are in place at the time of the on-site visit.</p> <p>The description must fully cover all essential criteria set out in the Methodology. Countries should also respond to the questions posed in the additional elements, though the level of detail may vary depending on the issue and the approach that a country has taken. For example, if a country has implemented one of the optional measures set out as an additional element, they should provide an adequate description of the measures taken. Any other relevant measures should also be adequately described. Descriptions should provide citations, quotes or summaries sufficient to describe the relevant elements of the law or other measures.</p> <p>In addition to the statistics referred to in s.1.7, countries could also provide any other statistics or data that they consider to be relevant to the effectiveness and efficiency of their system for combating money laundering and terrorist financing.</p>
Comments or other supplementary information (optional)	<p>Authorities may indicate the extent to which they believe they have met the FATF Recommendations and may provide other comments or other supplementary information, such as their analysis of the effectiveness of the measures in place.</p>

## 2 LEGAL SYSTEM AND RELATED INSTITUTIONAL MEASURES

### Laws and Regulations

#### 2.1 Criminalisation of Money Laundering (R.1 & 2)

Description (mandatory)	
Comments or other supplementary information (optional)	

#### 2.2 Criminalisation of Terrorist Financing (SR.II)

Description (mandatory)	
Comments or other supplementary information (optional)	

#### 2.3 Confiscation, freezing and seizing of proceeds of crime (R.3)

Description (mandatory)	
Comments or other supplementary information (optional)	

#### 2.4 Freezing of funds used for terrorist financing (SR.III)

Description (mandatory)	
Comments or other supplementary information (optional)	

**Authorities**

**2.5 The Financial Intelligence Unit and its functions (R.26, 30 & 32)**

Description (mandatory)	
Comments or other supplementary information (optional)	

**2.6 Law enforcement, prosecution and other competent authorities – the framework for the investigation and prosecution of offences, and for confiscation and freezing (R.27, 28, 30 & 32)**

Description (mandatory)	
Comments or other supplementary information (optional)	

**3. PREVENTIVE MEASURES - FINANCIAL INSTITUTIONS**

**Customer Due Diligence & Record Keeping**

**3.1 Risk of money laundering or terrorist financing**

*A country may decide not to apply certain AML/CFT requirements, or to reduce or simplify the measures being taken, on the basis that there is low or little risk of money laundering or terrorist financing. Similarly, as set out in R.5, financial institutions may, in certain circumstances determine the degree of risk attached to particular types of customers, business relationships, transactions or products. In section 3.1 countries should set out the basis upon which they have taken a decision not to apply the required AML/CFT measures to a particular financial sector. Where there are specific references to risk in individual Recommendations (see Instructions to Assessors) the issue of risk for those Recommendations should be described in the relevant section of the MER i.e. sections 3.2, 3.8, 3.13 and 4.1, 4.4 and 4.5. See AML/CFT Methodology 2004, paragraphs 17-18.*

Description	
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**3.2 Customer due diligence, including enhanced or reduced measures (R.5 to 8)**

Description	
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(mandatory)	
Comments or other supplementary information (optional)	

### 3.3 Third parties and introduced business (R.9)

Description (mandatory)	
Comments or other supplementary information (optional)	

### 3.4 Financial institution secrecy or confidentiality (R.4)

Description (mandatory)	
Comments or other supplementary information (optional)	

### 3.5 Record keeping and wire transfer rules (R.10 & SR.VII)

Description (mandatory)	
Comments or other supplementary information (optional)	

### Unusual and Suspicious Transactions

### 3.6 Monitoring of transactions and relationships (R.11 & 21)

Description (mandatory)	
Comments or other supplementary information (optional)	

**3.7 Suspicious transaction reports and other reporting (R.13-14, 19, 25 & SR.IV)**

Description (mandatory)	
Comments or other supplementary information (optional)	

**Internal controls and other measures**

**3.8 Internal controls, compliance, audit and foreign branches (R.15 & 22)**

Description (mandatory)	
Comments or other supplementary information (optional)	

**3.9 Shell banks (R.18)**

Description (mandatory)	
Comments or other supplementary information (optional)	

**Regulation, supervision, monitoring and sanctions**

**3.10 The supervisory and oversight system - competent authorities and SROs  
Role, functions, duties and powers (including sanctions) (R.17, 23, 29 & 30)**

Description (mandatory)	
Comments or other supplementary information (optional)	

**3.11 Financial institutions - market entry and ownership/control (R.23)**

Description (mandatory)	
Comments or other supplementary information (optional)	

**3.12 AML/CFT Guidelines (R.25)**

Description (mandatory)	
Comments or other supplementary information (optional)	

**3.13 Ongoing supervision and monitoring (R.23, 29 & 32)**

Description (mandatory)	
Comments or other supplementary information (optional)	

**3.14 Money or value transfer services (SR.VI)**

This section should very briefly summarise and cross-reference the description and any comments that have been made elsewhere in section 3 on money or value transfer services.

Description (mandatory)	
Comments or other supplementary information (optional)	

**4. PREVENTIVE MEASURES – DESIGNATED NON-FINANCIAL BUSINESSES AND PROFESSIONS**

**4.1 Customer due diligence and record-keeping (R.12)**  
(applying R.5 to 10)

Description (mandatory)	
Comments or other supplementary information (optional)	

**4.2 Monitoring of transactions and relationships (R.12 & 16)**  
(applying R.11 & 21)

Description (mandatory)	
Comments or other supplementary information (optional)	

**4.3 Suspicious transaction reporting (R.16)**  
(applying R.13 & 14)

Description (mandatory)	
Comments or other supplementary information (optional)	

**4.4 Internal controls, compliance & audit (R.16)**  
(applying R.15)

Description (mandatory)	
Comments or other supplementary information (optional)	

**4.5 Regulation, supervision and monitoring (R.17, 24-25)**

Description (mandatory)	
Comments or	

other supplementary information (optional)	
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**4.6 Other non-financial businesses and professions  
Modern secure transaction techniques (R.20)**

Description (mandatory)	
Comments or other supplementary information (optional)	

**5. LEGAL PERSONS AND ARRANGEMENTS & NON-PROFIT ORGANISATIONS**

**5.1 Legal Persons – Access to beneficial ownership and control information (R.33)**

Description (mandatory)	
Comments or other supplementary information (optional)	

**5.2 Legal Arrangements – Access to beneficial ownership and control information (R.34)**

Description (mandatory)	
Comments or other supplementary information (optional)	

**5.3 Non-profit organisations (SR.VIII)**

Description (mandatory)	
Comments or other supplementary information (optional)	

## **6. NATIONAL AND INTERNATIONAL CO-OPERATION**

### **6.1 National co-operation and coordination (R.31)**

Description (mandatory)	
Comments or other supplementary information (optional)	

### **6.2 The Conventions and UN Special Resolutions (R.35 & SR.I)**

Description (mandatory)	
Comments or other supplementary information (optional)	

### **6.3 Mutual Legal Assistance (R.32, 36-38, SR.V)**

Description (mandatory)	
Comments or other supplementary information (optional)	

### **6.4 Extradition (R.32, 37 & 39, & SR.V)**

Description (mandatory)	
Comments or other supplementary information (optional)	

### **6.5 Other Forms of International Co-operation (R.32 & 40, & SR.V)**

Description	
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(mandatory)	
Comments or other supplementary information (optional)	

## 7. Other Issues

Countries may use this section to set out information on any additional measures or issues that are relevant to the AML/CFT system, and which are not covered elsewhere in this report.

Description (mandatory)	
Comments or other supplementary information (optional)	

