

BUSINESS FROM SENSITIVE SOURCES NOTICE NUMBER 38

Notice given under Section 22(3)(b) of the Alderney eGambling Ordinance, 2009

30th June, 2020

This Business from Sensitive Sources Notice (“BSSN”) repeals and replaces BSSN 37 for eGambling licensee and certificate holders issued on 9th March, 2020.

There are two parts to this BSSN. Part A details high risk jurisdictions that are subject to a call for action by the Financial Action Task Force (“FATF”). Part B sets out countries and territories that are identified by relevant external sources as presenting a higher risk of ML and/or TF.

PART A

In accordance with Section 3(1)(b) of Schedule 16 of the Alderney eGambling Regulations, 2009 eGambling licensees and certificate holders must apply Enhanced Customer Due Diligence (“ECDD”) measures to any customer or business relationship where the customer or beneficial owner has a relevant connection with a country or territory that –

- (A) provides funding or support for terrorist activities, or does not apply (or insufficiently applies) the FATF Recommendations, or
- (B) is a country otherwise identified by the FATF as a country for which such measures are appropriate.

For the purposes of applying Section 3(1)(b) of Schedule 16 of the Alderney eGambling Regulations, 2009 to this part identifies those countries and territories in relation to which the FATF has listed as high risk.

Democratic People’s Republic of Korea [FATF Statement of 21 February 2020](#)

Iran [FATF Statement of 21 February 2020](#)

The action taken by each eGambling licensee or certificate holder under this part of the BSSN will be reviewed during on-site inspections and by other means as necessary.

PART B

eGambling licensees and certificate holders must consider the risk posed by jurisdictions in this Part of the BSSN when undertaking or reviewing the assessment of risk of any business or customer relationship.

The consideration of risk and of any consequential action taken by each eGambling licensee or certificate holder under this part of the BSSN will be reviewed during on-site inspections and by other means as necessary.

This Part lists countries and territories that are identified by the UK, US governments, intergovernmental and supranational organisations as presenting certain ML and/or FT risks. Alongside these sources, information is presented reflecting assessments of a country or territory by non-governmental organisations and think tanks which eGambling licensees and certificate holders may also find useful when they are determining the level of country risk presented by a business relationship. The AGCC does not accept responsibility for the findings and conclusions of these sources. The inclusion of a country or territory in this part does not automatically imply that a business relationship with a relevant connection to a country or territory in this part is high risk, as the eGambling licensee or certificate holder can continue to take a risk based decision on the level of overall risk within a business relationship having regard to their Business Risk Assessment. Please note that those countries and territories in relation to which the FATF has called for the application of countermeasures and therefore ECDD measures must be applied to a business relationship where the customer or beneficial owner has a relevant connection with one of those countries or territories that are listed in Part A of this BSSN.

Table of Countries and sources

Country/territory	Intergovernmental and Supranational Organisations, UK and US Government Sources							Non-Governmental Organisations and Think Tanks			
	FATF – jurisdictions under increased monitoring	OECD – jurisdictions that have yet to implement agreed tax standards	INCSR (US Department of State) – Major drug producing and transit countries	Worldwide Governance Indicators project (World Bank)	Human Trafficking – US Department of State	State sponsors of terrorism - US Treasury Country Reports on Terrorism – US	UK HM Treasury Sanctions	TRACE Bribery Risk Matrix 2019	Transparency International – Corruptions Perception	Fund for Peace/ Foreign Policy magazine – Fragile States Index (Alert level)	Global Terrorism Index 2019
	Source:1	Source:2	Source:3	Source:4	Source:5	Source:6	Source:7	Source:8	Source:9	Source:10	Source:11
Afghanistan			✓	✓		✓	✓	✓	✓	✓	✓
Albania	✓										
Algeria				✓				✓			
Angola				✓				✓	✓	✓	
Argentina			✓								
Aruba								✓			
Azerbaijan				✓					✓		

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The Bahamas	✓										
Bangladesh				✓				✓	✓	✓	
Barbados	✓										
Belarus				✓	✓		✓	✓			
Belize				✓				✓			
Benin				✓				✓			
Bhutan					✓						
Bolivia				✓				✓			
Bosnia and Herzegovina				✓				✓			
Botswana	✓										
Brunei		✓						✓			
Burkina Faso				✓							
Burundi				✓	✓		✓	✓	✓	✓	
Cambodia	✓			✓				✓	✓		
Cameroon				✓				✓	✓	✓	✓
Central African Republic				✓			✓	✓	✓	✓	✓
Chad				✓				✓	✓	✓	
China					✓			✓			
Colombia			✓			✓					
Comoros				✓	✓			✓	✓		
Congo, Democratic Republic of				✓	✓		✓	✓	✓	✓	

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Guatemala			✓	✓				✓	✓		
Guinea				✓			✓	✓	✓		
Guinea Bissau				✓			✓	✓	✓		
Guyana			✓					✓			
Haiti				✓				✓	✓		
Honduras			✓	✓				✓	✓		
Iceland	✓										
India											✓
Iraq				✓		✓	✓	✓	✓	✓	✓
Jamaica	✓										
Kazakhstan								✓			
Kenya			✓	✓				✓	✓		
Kosovo				✓							
Kuwait								✓			
Kribati								✓			
Kyrgyz Republic (Kyrgyzstan)				✓				✓	✓		
Lao PDR ¹				✓				✓	✓		
Lebanon				✓		✓	✓	✓	✓		
Lesotho				✓				✓			
Liberia				✓				✓	✓	✓	

¹ Lao PDR called Laos in earlier years.

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Libya				✓	✓	✓	✓	✓	✓	✓	✓
Madagascar				✓				✓	✓		
Malawi				✓				✓			
Maldives				✓				✓	✓		
Mali				✓			✓	✓	✓	✓	✓
Mauritania				✓	✓			✓	✓	✓	
Mauritius	✓										
Mexico			✓	✓				✓	✓		
Moldova				✓				✓			
Mongolia	✓							✓			
Morocco								✓			
Mozambique				✓				✓	✓	✓	
Myanmar (Burma)	✓			✓	✓		✓	✓	✓	✓	
Nepal				✓				✓			
Nicaragua	✓			✓			✓	✓	✓		
Niger				✓				✓		✓	
Nigeria			✓	✓				✓	✓	✓	✓
Pakistan	✓		✓	✓		✓		✓		✓	✓
Panama	✓		✓								
Papua New Guinea				✓	✓			✓	✓		

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Paraguay			✓	✓				✓	✓		
Peru			✓								
Philippines			✓								✓
Russia			✓	✓	✓			✓	✓		
Rwanda										✓	
Saudi Arabia					✓						
Sao Tome and Principe								✓			
Sierra Leone				✓				✓			
Sint Maartin		✓									
Solomon Islands								✓			
Somalia				✓	✓	✓	✓	✓	✓	✓	✓
Sri Lanka								✓			
South Sudan				✓	✓		✓	✓	✓	✓	✓
Sudan				✓		✓	✓	✓	✓	✓	
Suriname								✓			
Syria	✓			✓	✓	✓	✓	✓	✓	✓	✓
Tajikistan				✓				✓	✓		
Tanzania				✓				✓			
Thailand											✓
Timor-Leste				✓							
Togo				✓				✓	✓	✓	

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Trinidad & Tobago		✓						✓			
Tunisia							✓				
Turkey				✓			✓	✓			✓
Turkmenistan				✓	✓			✓	✓		
Uganda	✓			✓				✓	✓	✓	
Ukraine				✓			✓	✓	✓		
Uzbekistan				✓				✓	✓		
Venezuela			✓	✓	✓	✓	✓	✓	✓	✓	
Vietnam			✓					✓			
Yemen	✓			✓	✓	✓	✓	✓	✓	✓	✓
Zambia				✓				✓		✓	
Zimbabwe	✓			✓			✓	✓	✓	✓	
The Lake Chad Region						✓					
The Trans-Sahara						✓					
The Southern Philippines						✓					
The Sulu/ Sulawesi Seas Littoral						✓					
West Bank and Gaza				✓							

Reliable and Independent External Sources

- 1 Financial Action Task Force: jurisdictions under increased monitoring (21 February 2020) – <https://www.fatf-gafi.org/publications/high-risk-and-other-monitored-jurisdictions/documents/increased-monitoring-february-2020.html>
- 2 OECD: Global Forum on Transparency and Exchange of Information for Tax Purposes – countries that have not exchanged information because their legal implementation is ongoing <http://www.oecd.org/tax/transparency/aeoi-implementation-report-2019.pdf>
- 3 United States Department of State: International Narcotics Strategy Report of March 2020 – countries where proceeds from drug trafficking significantly affects the U.S.A. <https://www.state.gov/wp-content/uploads/2020/03/Tab-2-INCSR-Vol-2-508.pdf>
- 4 Worldwide Governance Indicators project (2019 Update) – countries scoring an average of 40 per cent or less – across all areas assessed (voice and accountability, political stability (no violence), government effectiveness, regulatory quality, rule of law, and control of corruption) - <http://info.worldbank.org/governance/wgi/#home>
- 5 United States Department of State: Trafficking in Persons Report (June 2019) – Tier 3: countries that do not fully comply with minimum standards and are not making significant effort to do so and special cases - <https://www.state.gov/reports/2019-trafficking-in-persons-report/>
- 6 United States Department of the Treasury: Terrorist Assets Report (2018) - <https://www.treasury.gov/resource-center/sanctions/Programs/Documents/tar2018.pdf>; and United States Department of State: Country Reports on Terrorism 2018 (October 2019) - <https://www.state.gov/reports/country-reports-on-terrorism-2018/>
- 7 United Kingdom’s HM Treasury <https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases>
- 8 TRACE Bribery Risk Matrix 2019 – countries with a score of 55 or more - <https://www.traceinternational.org/trace-matrix>
- 9 Transparency International: corruption perceptions index (2019) – countries with a score of 30 or less https://www.transparency.org/whatwedo/pub/corruption_perceptions_index_2019
- 10 United States think-tank: Fund for Peace/ Foreign Policy magazine: Fragile States Index (2019) - Top 40 countries - <https://fundforpeace.org/what-we-do/country-risk-and-fragility-data/>
- 11 Global Terrorism Index 2019: Countries where the impact of terrorism is rated as being very high or high <http://visionofhumanity.org/app/uploads/2019/11/GTI-2019web.pdf>