

BUSINESS FROM SENSITIVE SOURCES NOTICE NUMBER 39

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

6th April 2021

This Business from Sensitive Sources Notice (“BSSN”) repeals and replaces BSSN 38 for eGambling licensee and certificate holders issued on 30th June, 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.

The attention of eGambling licensees and certificate holders is drawn to their obligations as set out in Sections 1 and 2 of Schedule 4 of the Alderney eGambling Ordinance, 2009 with regards to the risk assessments that must be undertaken.

PART A

In accordance with Section 4(1)(b) of Schedule 4 of the Alderney eGambling Ordinance, 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 4(1)(b) of Schedule 4 of the Alderney eGambling Ordinance, 2009 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

	Intergovernmental and Supranational Organisations, UK and US Government Sources							Non-Governmental Organisations and Think Tanks			
Country/territory	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 Department of State	UK HM Treasury Sanctions	TRACE Bribery Risk Matrix 2020	Transparency International – Corruptions Perception Index 2020	Fund for Peace/ Foreign Policy magazine – Fragile States Index (Alert level)	Global Terrorism Index 2020
	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			✓								
Azerbaijan				✓				✓	✓		

Country/territory	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 Department of State	UK HM Treasury Sanctions	TRACE Bribery Risk Matrix 2020	Transparency International – Corruptions Perception Index 2020	Fund for Peace/ Foreign Policy magazine – Fragile States Index (Alert level)	Global Terrorism Index 2020
Bangladesh				✓				✓	✓	✓	
Barbados	✓										
Belarus				✓	✓		✓				
Belize								✓			
Benin				✓							
Bolivia				✓				✓			
Bosnia and Herzegovina				✓			✓	✓			
Botswana	✓										
Burkina Faso	✓			✓						✓	✓
Burundi				✓	✓		✓	✓	✓	✓	
Cambodia	✓			✓				✓	✓		
Cameroon				✓				✓	✓	✓	✓
Cayman Islands	✓										
Central African Republic				✓			✓	✓	✓	✓	✓
Chad				✓				✓	✓	✓	
China					✓						
Colombia			✓			✓					✓
Comoros				✓	✓			✓	✓		
Congo, Democratic Republic of				✓			✓	✓	✓	✓	✓

Country/territory	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 Department of State	UK HM Treasury Sanctions	TRACE Bribery Risk Matrix 2020	Transparency International – Corruptions Perception Index 2020	Fund for Peace/ Foreign Policy magazine – Fragile States Index (Alert level)	Global Terrorism Index 2020
Haiti				✓				✓	✓	✓	
Honduras			✓	✓				✓	✓		
India											✓
Iraq				✓		✓	✓	✓	✓	✓	✓
Jamaica	✓										
Kenya			✓	✓						✓	
Kiribati								✓			
Kosovo				✓							
Kyrgyz Republic (Kyrgyzstan)				✓				✓			
Lao PDR ¹				✓				✓	✓		
Lebanon				✓		✓	✓	✓	✓	✓	
Lesotho				✓	✓						
Liberia				✓				✓	✓	✓	
Libya				✓	✓	✓	✓	✓	✓	✓	✓
Madagascar				✓				✓	✓		
Malawi				✓				✓	✓		

¹ Lao PDR called Laos in earlier years.

Country/territory	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 Department of State	UK HM Treasury Sanctions	TRACE Bribery Risk Matrix 2020	Transparency International – Corruptions Perception Index 2020	Fund for Peace/ Foreign Policy magazine – Fragile States Index (Alert level)	Global Terrorism Index 2020
Senegal	✓										
Sierra Leone				✓				✓			
Sint Maartin		✓									
Somalia				✓	✓	✓	✓	✓	✓	✓	✓
South Sudan				✓	✓		✓	✓	✓	✓	
Sri Lanka											✓
Sudan				✓		✓	✓	✓	✓	✓	
Syria	✓			✓	✓	✓	✓	✓	✓	✓	✓
Tajikistan				✓				✓	✓		
Tanzania				✓							
Timor-Leste (East Timor)				✓							
Togo				✓				✓	✓	✓	
Trinidad & Tobago		✓									
Tunisia							✓				
Turkey				✓			✓				✓
Turkmenistan				✓	✓			✓	✓		
Uganda	✓			✓				✓	✓	✓	
Ukraine				✓			✓				
Uzbekistan				✓				✓	✓		

Country/territory	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 Department of State	UK HM Treasury Sanctions	TRACE Bribery Risk Matrix 2020	Transparency International – Corruptions Perception Index 2020	Fund for Peace/ Foreign Policy magazine – Fragile States Index (Alert level)	Global Terrorism Index 2020
Venezuela			✓	✓	✓	✓	✓	✓	✓	✓	
Vietnam			✓					✓			
Yemen	✓			✓	✓	✓	✓	✓	✓	✓	✓
Zambia				✓				✓		✓	
Zimbabwe	✓			✓			✓	✓	✓	✓	
North Sinai						✓					
The Lake Chad Region						✓					
The Trans-Sahara						✓					
The Southern Philippines						✓					
The Sulu/ Sulawesi Seas Littoral						✓					
West Bank and Gaza				✓							

Relevant External Sources

- 1 Financial Action Task Force: jurisdictions under increased monitoring (25 February 2021) - <http://www.fatf-gafi.org/publications/high-risk-and-other-monitored-jurisdictions/documents/increased-monitoring-february-2021.html>
- 2 OECD: Global Forum on Transparency and Exchange of Information for Tax Purposes – Peer Review of the Automatic Exchange of Financial Account Information (2020) – jurisdictions that have not yet exchanged information because their legal implementation is ongoing - <https://www.oecd-ilibrary.org/docserver/175eef4-en.pdf?expires=1614606278&id=id&accname=guest&checksum=6EC373314D72AA0371B697D319DFFDE8>
- 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 (2020 Update) – countries scoring an overall average of 40 per cent or less across the areas assessed for that country (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 2020) – 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/2020-trafficking-in-persons-report/>
- 6 United States Department of the Treasury: Terrorist Assets Report (2019) - https://home.treasury.gov/system/files/126/tar2019_0.pdf; and United States Department of State: Country Reports on Terrorism 2019 (June 2020) - <https://www.state.gov/reports/country-reports-on-terrorism-2019/>
- 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 2020 – countries with a risk score of 55 or more - <https://www.traceinternational.org/trace-matrix>
- 9 Transparency International: corruption perceptions index (2020) – countries with a score of 30 or less - <https://www.transparency.org/en/cpi/2020/index/>
- 10 United States think-tank: Fund for Peace / Foreign Policy magazine: Fragile States Index (2020) – Top 40 countries - <https://fundforpeace.org/2020/05/11/fragile-states-index-2020/>
- 11 Global Terrorism Index 2020: Countries where the impact of terrorism is rated as being very high or high - <https://visionofhumanity.org/wp-content/uploads/2020/11/GTI-2020-web-1.pdf>