



EXECUTIVE SUMMARY

1. This report provides a summary of the AML/CFT measures in place in Chinese Taipei as at the end of the on-site visit (16 November 2018). It analyses the level of compliance with the Financial Action Task Force (FATF) 40 Recommendations and the level of effectiveness of Chinese Taipei's AML/CFT system, and provides recommendations on how the system could be strengthened.

Key Findings

- 1) Chinese Taipei has pursued wide ranging reforms since early 2017, with very significant progress achieved in a short period of time. This reflects strong political commitment to AML/CFT reform, significant commitment of resources, effective coordination, and efforts to strengthen and deepen the culture and practice of money laundering / terrorist financing (ML/TF) risk management.
- 2) Chinese Taipei has a generally sound understanding of its ML/TF risks which is reflected in its public national risk assessment (NRA) and other assessments. National and agency-level AML/CFT policies and activities seek to address the risks identified in the assessments. Co-ordination and co-operation on AML/CFT issues at both the policy and operational levels has improved significantly since the last evaluation.
- 3) Financial intelligence and related information is used extensively in ML and predicate offence investigations and in tracing criminal proceeds. Law enforcement agencies (LEAs) are well-equipped and experienced in generating and using financial intelligence to follow money trails and uncover complex structures and networks. The Anti-Money Laundering Division of the MJIB (AML/D) - Chinese Taipei's financial intelligence unit (FIU) - produces good quality intelligence and adds value in financial investigations, particularly those involving international elements.
- 4) Law enforcement agencies (LEAs), including prosecutors, conduct complex ML investigations actively tracing money trails, lifting the corporate veil, unravelling layers of ownership and pursuing funds sent offshore. Prosecutors drive ML investigations and coordinate authorities according to expertise. The range of ML investigations and prosecutions is generally in line with the risk profile with the exception of relatively low numbers of ML related to drug trafficking and smuggling. However, authorities are not using the ML offence to the extent

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necessary across a broad range of conduct in the context of Chinese Taipei. The conviction rate for ML is low and the penalties applied have not been dissuasive. Chinese Taipei has used a variety of tools in identifying, tracing and forfeiting criminal assets which operate well in practice. Chinese Taipei is successful in forfeiting a significant value of assets when compared to the size of its economy. Forfeiture appears to be consistent with Chinese Taipei's risk profile.

- 5) A number of financial investigations of suspected TF cases have been successfully undertaken. They involved intelligence sharing and ultimately uncovered conduct that was unrelated to TF. There have been no TF convictions, which is in keeping with Chinese Taipei's TF risk profile.
- 6) Chinese Taipei has strong policy and operational coordination mechanisms to support the implementation of targeted financial sanctions (TFS) to combat terrorism and proliferation of weapons of mass destruction (WMD). Authorities have issued guidance to all sectors and undertaken a great deal of outreach to all financial institutions (FI) and designated non-financial businesses and professions (DNFBP) sectors and have supported all sectors to have access to screening software to support implementation of TFS. FIs, especially banks, demonstrate a good understanding of TFS obligations and the implementation of customer and transaction monitoring to identify possible sanctions matches.
- 7) Implementation of TFS for DPRK-related designations has resulted in 81 freezing actions worth over USD 3.96 million. While there are minor shortcomings in the scope of TFS for proliferation financing (PF), the legal framework goes beyond FATF standards by also establishing a PF offence, related suspicious transaction reporting (STR) obligations and a domestic designation system for TFS. Chinese Taipei has designated a local and entities working on his behalf/at his direction linked to PF and subjected them to TFS, resulting in freezing considerable assets. A large number of PF-related STRs have been received and intelligence has been developed to identify possible networks of associates. Authorities have granted access to frozen funds for basic expenses in keeping with the standards.
- 8) Technical compliance elements for preventive measures are generally comprehensive. There has been a shift towards a risk-based approach in the banking sector since 2013, but this approach is newer in many other sectors. Sectoral supervisors have undertaken very significant amounts of awareness raising on AML/CFT obligations and ML/TF risks. Tailored guidance has been issued for each sector.
- 9) Chinese Taipei has a generally robust system of AML/CFT supervision for FIs. AML/CFT supervision of DNFBP sectors has only recently commenced. The sanctions imposed on banks, securities and insurance for AML/CFT breaches are relatively low and may not be wholly effective or proportionate. More broadly than the level of fines, overall the effects of supervisory actions have significantly influenced compliance in a positive way through remedial measures, enforcement actions and reputation damage.
- 10) Authorities have a mixed understanding of the risks associated with legal persons and legal arrangements. Authorities rely on CDD conducted by FIs and DNFBPs to obtain up to date

beneficial ownership information of legal persons and arrangements. LEAs and the AMLD demonstrated examples of using CDD information and investigative strategies to obtain information on the beneficial ownership and control of legal persons. The scope and quality of the information held on the company registry has greatly improved in the period prior to this assessment. There are a number of controls on legal persons to mitigate their risk of misuse related to nominee shares and nominee directors. Despite the large numbers of civil trusts formed in Chinese Taipei, there are few measures to support the transparency of trusts and capturing information on settlors or trustees.

- 11) Chinese Taipei provides good quality constructive assistance for international cooperation requests related to ML and asset restraint and forfeiture.

Risks and General Situation

2. Chinese Taipei has a well-developed financial sector and stable economy which makes it an attractive venue for both domestic and foreign proceeds of crime to be laundered. The banking sector, including the well-developed sector of offshore banking units (OBU), presents the greatest risks and there are particular risks from informal remittance. Banks dominate the financial sector, handle a high volume of transactions, and are well interconnected with the international financial system. Chinese Taipei is subject to an array of predicate offences which generate significant proceeds. These offences to a large degree stem from organised crime, including drug trafficking, fraud and smuggling. Other predicate offences of note include corruption and bribery, and specific types of fraud including tax and securities-related crimes. Typical ML methods include the use of wire transfers to dummy accounts (including OBU accounts), cash couriers, underground remittance, foreign third parties, shell and front companies to conceal beneficial ownership and the purchase and sale of real estate. The high use of cash and the relatively large informal economy significantly increases the risk that illicit proceeds may be channelled into the formal economy.

3. There is no specific intelligence suggesting that Chinese Taipei is a likely target of terrorism, or evidence of foreign terrorist actors with connection to Chinese Taipei. The threat of financing domestic terrorism is low. Externally, there have not been any suspected cases of funds of designated persons or entities, or funds associated with terrorism cases entering or being sourced from the jurisdiction. Chinese Taipei has some links between certain segments of the community and regions affected by terrorism, which slightly increases the threat of TF, albeit within a low level.

Overall Level of Effectiveness and Technical Compliance

4. Chinese Taipei has established a legal and institutional framework that is particularly strong in relation to technical compliance. Minor shortcomings include the scope of property subject to TFS for terrorism and WMD proliferation and some technical elements of the TF offence.

5. Chinese Taipei has implemented an AML/CFT system that shows a number of areas of effectiveness. Particularly good results are being achieved in the areas of understanding the ML/TF risks and pursuing domestic cooperation and coordination to address risks; the development and use of financial intelligence and related financial investigation for predicate offences and the restraint and confiscation of proceeds and instruments of crime; the implementation of TFS related to terrorism and protecting the non-profit sector from terrorist abuse; and co-operating internationally to support AML/CFT. Major improvements are needed to strengthen supervision and implementation of preventive measures and to prevent the misuse of legal persons and arrangements.

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6. In the initial part of the 10 years since Chinese Taipei's last mutual evaluation little progress was made with AML/CFT reforms. However, since early 2017 very significant changes to policy and resource allocation have occurred which have supported comprehensive AML/CFT reforms and large scale implementation of the legal and institutional framework and the scope of implementation.

Assessment of Risks, coordination and policy setting (Chapter 2 - IO.1; R.1, R.2, R.33)

7. Chinese Taipei demonstrated a generally sound understanding of ML/TF risks. This is reflected in the NRA process, which included a very wide range of government and private sector stakeholders and resulted in a public document, a slightly more comprehensive document for participating stakeholders and a great deal of associated outreach and awareness raising work on the findings of risk. Sectoral risk assessments and FIU strategic intelligence products have added to a shared understanding of risk. Overall AML/CFT policies and activities largely seek to address the risks identified in the NRA and other assessments.

8. National co-ordination and co-operation on AML/CFT issues at the policy and operational levels has improved significantly since the last evaluation. This is particularly evident in relation to policy level co-ordination among LEAs, however there are opportunities for deeper cooperation at operational levels.

Financial Intelligence, Money Laundering & Confiscation (Chapter 3 - IOs 6-8; R.3, R.4, R.29-32)

Use of financial intelligence to investigate ML, TF, predicate offence and to trace assets (Immediate Outcome 6)

9. The competent authorities, in particular LEAs, investigating prosecutors and the tax authorities regularly develop and use a broad range of financial intelligence and other relevant information to investigate predicate offences, ML and possible TF and to trace criminal proceeds. LEAs (especially the MOJ Investigation Bureau (MJIB)) and investigating prosecutors have very well-developed capabilities to utilise FIU-disseminated intelligence in financial investigations.

10. Chinese Taipei's FIU is the AMLD, which is located within the MJIB. The FIU has a well-developed analytical capability and has excellent IT resources and skilled staff. AMLD produces good quality financial intelligence. AMLD suffers, to an extent, from a lack of human resources as it also has a significant role in relation to outreach, risk assessment work, TFS support and international cooperation.

11. While the full range of FIs and DNFBPs are required to report STRs, there was an underreporting of STRs by higher risk sectors until recent reforms and enhanced risk-based outreach to all sectors.

Investigating, prosecuting and sanctioning ML (Immediate Outcome 7)

12. Chinese Taipei had not prioritised the pursuit of ML cases until 2017, at which time amendments were made to the MLCA which improved the ML offence. LEAs have very well-developed financial investigation and prosecution capacity; however the nature of the ML offence and a lack of policy priority prior to 2017 have meant that ML was pursued to a lesser extent. Results of ML prosecutions show low conviction rates and very low sentences applied. The level of prosecutions and convictions of ML has not been in keeping with its threats, risk profile and AML/CFT policies.

Restraining and confiscating proceeds and instruments of crime (Immediate Outcome 8)

13. Chinese Taipei pursues confiscation as a policy objective and competent authorities have confiscated approximately USD 457 million since 2014 using the Criminal Code and the Criminal Procedure Code (CPC) and had restrained approximately USD 191 million at the time of the onsite visit. Tax authorities have recovered considerable funds using their powers. Chinese Taipei has demonstrated its ability to recover assets across a range of crime areas in keeping with the risk profile. LEAs, including prosecutors, have well-developed asset tracing capacity and routinely pursue financial investigations to identify assets for the purpose of recovery.

14. Cash is seized at the border and the authorities have, to a certain extent, proactively targeted high-risk ports of entry. However, forfeiture applied in relation to breaches of the cross border declaration system is not applied proportionately in all cases. Overall, the extent of targeting threats posed by cash couriers has not been in keeping with the risk profile.

Terrorist Financing and Financing Proliferation (Chapter 4 - IOs 9-11; R.5-8)

Investigating, prosecuting and sanctioning terrorist financing (Immediate Outcome 9)

15. TF risks are low overall, but despite this, TF investigations are given a high priority. LEAs, prosecutors, the FIU and security intelligence authorities have well-developed investigation capacity, and standard operating procedures to respond to possible cases of terrorism or TF.

16. There have been a number of cases where authorities have proactively and systematically investigated TF alongside possible terrorism cases and, in two other incidents, investigated possible TF cases. In all of these cases, the conduct identified did not relate to terrorism or TF, but the investigations demonstrated the TF investigation capacity and the ability to thoroughly investigate in a coordinated joint agency context. The conduct of financial investigations is in keeping with Chinese Taipei's threats, risk profile and AML/CFT policies.

Preventing terrorists from raising, moving and using funds (Immediate Outcome 10)

17. In keeping with its profile, Chinese Taipei has not made any domestic designations pursuant to UNSCR 1373 or made a request or given effect to other countries' requests to take freezing action as appropriate. Chinese Taipei implements TFS without delay, communicating new UN listings to covered entities within one business day of UN listings. MJIB, Financial Supervisory Commission (FSC) and other authorities have undertaken a great deal of outreach and communication on TFS obligations and provided guidance. Implementation is supported by subsidising FI/DNFBP access to sanctions screening software to small enterprises to comprehensively screen for sanctioned persons and entities. Supervision of TFS implementation (offsite and onsite) has occurred across many sectors. While understanding of TFS is best developed amongst banks and bigger FIs, implementation is occurring amongst smaller entities.

18. Chinese Taipei has a good understanding of the TF risks associated with NPOs and applies a risk-based approach to mitigating those risks. There have been a number of recent improvements to the legal framework to promote transparency and a significant allocation of resources to support outreach to NPOs. Over the last two years charities regulators, AMLD and other LEAs have engaged regularly with the NPO sectors on CFT issues and have conducted extensive outreach and issued useful guidance. A graded range of risk mitigation obligations, guidance and supervision has been applied taking into account the relative risks of particular sub-sectors and the features and activities of individual NPOs. The charities regulators are able to support LEAs to investigate NPOs suspected of being abused by terrorist financiers.

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19. Chinese Taipei also has a sound confiscation regime through which it can apply criminal and measures to deprive terrorists of their assets. Overall, Chinese Taipei's measures are generally consistent with its overall risk profile.

Preventing persons or entities involved in the proliferation of WMD from moving and using funds (Immediate Outcome 11)

20. Countering WMD proliferation financing is a strategic priority for Chinese Taipei and it has implemented domestic measures to meet and go beyond the FATF standards, including identifying and designating domestic persons and entities that may be linked to sanctions evasion and implementing TFS against them without delay. TFS designations are effective without delay in Chinese Taipei, entering into force within 24 hours of a designation by the UN. They are communicated on the same day to FI/DNFBP and other stakeholders. Chinese Taipei's use of its domestic designation mechanism to designate certain entities owned or controlled by the principal designee has partly contributed to overcoming the technical compliance gap in the scope of coverage of freezing obligations. Freezing actions have occurred in Chinese Taipei within 6 hours of new UN designations being made pursuant to UNSCR 1718.

21. Chinese Taipei has well-developed mechanisms for addressing PF in a co-ordinated fashion at policy and operational levels. MJIB, FSC and other authorities have undertaken a great deal of outreach and communication on TFS obligations and provided guidance. As with IO10, by making comprehensive sanctions screening software (TDCC) available to FIs/DNFBP at subsidised rates, both large and small FI/DNFBPs have the necessary tools and have been shown to actively screen for possible matches with UN sanctioned persons and entities. Supervision (offsite and onsite) has occurred across FI sectors on TFS implementation (Iran and DPRK sanctions). Regulators' outreach—combined with very active publicity of PF-related TFS—has supported improved understanding by FI/DNFBPs of their obligations. The understanding of obligations appears to be well-developed amongst banks and bigger FIs, and reasonably developed amongst smaller FIs and DNFBPs.

22. Chinese Taipei demonstrated 81 PF-related freezing actions with the equivalent of over USD 3.96 million frozen. These frozen assets are associated with two designated persons and six designated entities. Chinese Taipei has implemented publicly-known procedures for providing access to funds for basic expenses.

AML/CFT Preventive Measures (Chapter 5 - IO4; R.9-23)

23. Chinese Taipei has a large financial sector and moderately-sized DNFBP sectors. The level and types of ML/TF risks affecting individual FIs and DNFBPs vary, as do the ML/TF risks facing particular sectors. All of the entities performing activities covered by the FATF Standards (except casinos, which are illegal in the jurisdiction) are required to apply a range of risk-based AML/CFT preventive measures, which are generally consistent across all sectors.

24. AML/CFT compliance is not consistent across different categories of FI. While the numbers and quality of STRs has recently improved, there are concerns about the low level of STR reporting in many sectors, including some identified as being at high-risk, and challenges with the quality of STRs being filed. The banking sector plays a predominant role in the Chinese Taipei financial system, including nearly all of the formal remittance. Overall, the understanding of ML/TF risks and obligations and implementation of AML/CFT measures appears most developed among the banks which demonstrated awareness of their AML/CFT risks in line with many aspects of the NRA. Other large FIs (insurance providers, investment firms and wealth managers) display a reasonable understanding of risks and AML/CFT compliance requirements in their sectors; however, both banks and NBFIs, particularly smaller firms, have a mixed understanding of risk. The understanding

of ML/TF risk is much less developed among DNFBPs as the requirement for these entities to undertake a written risk assessment is very recent. A number of obligations on DNFBPs are very new or recently improved.

25. Implementation of AML/CFT measures is reasonable across FIs and has recently been enhanced amongst most DNFBPs. Over the last 1-2 years authorities and sectoral association have greatly increased their support to FI and DNFBP sectors to promote implementation, which has seen improvements in the application of many preventive measures. Since early 2018 when the NRA was issued and regulations were updated, implementation has increasingly been risk-based across a wider range of FIs and DNFBP sectors.

AML/CFT fit and proper controls and AML/CFT supervision (Chapter 6 - IO3; R.26-28, R. 34-35)

26. All of the relevant FI and DNFBP sectors covered under the FATF Standards are supervised for AML/CFT compliance. Casinos are illegal and trust and company service providers are not present in the jurisdiction as a separate sector. Generally, there are systems in place for background checks and on fitness and propriety of persons owning or controlling regulated entities, however there are weaknesses across the board with checking for associations with criminals.

27. FSC has a reasonable understanding of ML/TF risks, which is in line with the NRA. Their sectoral risk understanding is reasonable, but there are some challenges with their ability to develop an updated picture of sectoral risks and firm-specific risk level reflecting a need for a wider range of inputs from LEAs and the FIU.

28. The frequency scope and intensity of FSC's offsite and onsite supervision is increasingly based on the identified risks. Greater inputs from LEAs and the FIU are needed to guide risk-based supervisory choices, particularly in relation to higher risk scenarios. Other supervisors are still developing their supervisory capacity.

29. The quality of FSC's supervision appears to be relatively high. FSC has experienced supervisors who demonstrated good AML/CFT skills. The sanctions imposed on banks, securities, and insurance for AML/CFT breaches are relatively low and may not be wholly effective or proportionate. More broadly than the level of fines, the overall effects of remedial measures, enforcement actions and reputation damage appear to be significantly influencing compliance in a positive way.

30. Chinese Taipei authorities have undertaken a very large number of programs to promote a clear understanding of ML/TF risks and AML/CFT obligations in the recent years. This has included close cooperation between supervisors, sectoral associations, the FIU and LEAs.

Transparency of Legal Persons and Arrangements (Chapter 7 - IO5; R. 24-25)

31. A number of reforms to the company law were taken in 2018 to improve governance and transparency of legal ownership and control and governance of legal persons and to improve mechanisms to assist competent authorities to lift the corporate veil. Chinese Taipei acknowledges risks posed by corporate structures and, to a lesser extent, trusts and is taking some steps to mitigate these risks. Details of nominee directors and shareholders are publicly available on the registry. Bearer share warrants have been abolished since mid-2018, and some of the risks from bearer shares have been mitigated. There are limited transparency obligations on private express trusts, and competent authorities do not display a good understanding of risks they may pose and measures to identify and apply transparency controls of such legal arrangements.

32. Chinese Taipei has recently improved the regulatory framework for all FIs and DNFBPs to obtain and maintain beneficial ownership, but there is still some way to go before all reporting Anti-money laundering and counter-terrorist financing measures in Chinese Taipei 2019 @ APG 2019

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entities are complying with these requirements. The context of Chinese Taipei sees relatively little professional intermediation in the establishment or continuing operation of legal persons, so FIs/DNFBPs may not consistently hold up to date and accurate information on beneficial ownership. LEAs can access any available beneficial ownership information collected by FIs and DNFBP through CDD in a timely fashion.

33. Authorities demonstrated regular use of a combination of investigative techniques, basic information and CDD data obtained from FI/DNFBPs to identify beneficial ownership and control of corporate structures. This has included international cooperation in sharing such information.

International Cooperation (Chapter 8 - IO2; R. 36-40)

34. In general, Chinese Taipei provides good quality, constructive and timely assistance for international cooperation requests related to ML, predicates and asset restraint and forfeiture. The assistance provided and sought by Chinese Taipei has included formal mutual legal assistance (MLA) as well as sharing financial intelligence, supervisory information, exchanges between LEAs and other forms of international cooperation. Chinese Taipei has made three outgoing extradition requests. Repatriation and deportation of wanted individuals has been achieved between Chinese Taipei and China under the Cross-Strait Joint-Fight against Crime and Mutual Legal Assistance Agreement (2009).

35. The efforts of LEAs in actively seeking international cooperation has resulted in perpetrators being prosecuted and convicted, along with criminal asset seizure outside of Chinese Taipei. Chinese Taipei seeks assistance in an appropriate and timely manner to pursue domestic predicates, however, it has not demonstrated sufficient proactive pursuit of international assistance on ML violations.

36. Chinese Taipei routinely uses other forms of international cooperation in a proper and timely manner and works hard to overcome the long-standing challenges it faces to ensure productive international cooperation. Chinese Taipei maintains a global network of LEA, MJIB and Customs representatives overseas who coordinate international cooperation on behalf of Chinese Taipei and have been able to assist and obtain assistance from foreign counterparts in a dynamic manner. Chinese Taipei shares basic and, as it can be identified, beneficial ownership information.

Priority Actions

37. The prioritised actions that Chinese Taipei should take include:

- a) Amend the CTF Act to address TC gaps in relation to TFS and the minor gaps in relation to TF.
- b) Increase the human resources available to the AMLD to ensure that financial intelligence is fully exploited and that it is able to continue to service the demands it faces in relation to outreach, information sharing, risk assessments, TFS coordination, etc.
- c) Institutionalise the strong coordination structure that was put in place ahead of the ME (the AMLO) to support ongoing priority actions to mitigate ML/TF/PF risk.
- d) Prioritise further comprehensive assessments of risk including: cash economy issues (including scope of the cash economy; cross-border movement of cash); ML risks with underground banking; foreign legal persons and arrangements in Chinese Taipei's offshore sector; organised crime involvement in third-party ML; emerging TF issues (including global trends on terrorism and TF). Pursue international cooperation to obtain inputs on such assessments.

- e) Further integrate interaction between AMLD analysts and MJIB and police at the stage of targeting high risk crime types, e.g. drug trafficking, smuggling and third-party ML networks.
- f) LEAs should increase the use of the ML offence including through enhancement of the quality of briefs of evidence, consideration of ML at an early stage of predicate investigations, and prioritisation of third party ML across a wider range of offences.
- g) Consider introducing AEA into asset management at the asset seizure stage or earlier, thereby relieving prosecutor's workload and effectively using AEA's expertise to manage proceeds of crime assets to preserve their value for forfeiture.
- h) Prioritise deeper implementation of ML risk management, in particular CDD, over higher risk sub-sectors among banks. Enhance liaison and engagement between supervisors and LEAs with the private sector, including industry associations and other sectoral groups. In particular, improved and more frequent inputs from LEAs on ML/TF/PF risks posed to FIs and DNFBPs subject to higher threats and vulnerabilities. Provide further risk-based guidance on beneficial ownership, taking into consideration Chinese Taipei's FI and DNFBP sectoral vulnerabilities.
- i) Supervisors (especially for DNFBPs) should increase capacity with regards to the number of specialist AML supervisory staff, supervisory tools, and training for risk-based supervision.
- j) FSC and LEAs should implement further measures to support information exchange on risk. The obligations on market entry fit and proper should be expanded and further implemented. This should include enhanced information sharing between agencies, including continuing international cooperation between supervisors.

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Effectiveness & Technical Compliance Ratings

Effectiveness Ratings

IO.1 - Risk, policy and coordination	IO.2 - International cooperation	IO.3 - Supervision	IO.4 - Preventive measures	IO.5 - Legal persons and arrangements	IO.6 - Financial intelligence
Substantial	Substantial	Moderate	Moderate	Moderate	Substantial
IO.7 - ML investigation & prosecution	IO.8 - Confiscation	IO.9 - TF investigation & prosecution	IO.10 - TF preventive measures & financial sanctions	IO.11 - PF financial sanctions	
Moderate	Substantial	Substantial	Substantial	Substantial	

Technical Compliance Ratings (C – compliant, LC – largely compliant, PC – partially compliant, NC – non compliant)

R.1 - Assessing risk & applying risk-based approach	R.2 - National cooperation and coordination	R.3 - Money laundering offence	R.4 - Confiscation & provisional measures	R.5 - Terrorist financing offence	R.6 - Targeted financial sanctions – terrorism & terrorist financing
LC	LC	LC	LC	LC	LC
R.7 - Targeted financial sanctions – proliferation	R.8 - Non-profit organisations	R.9 - Financial institution secrecy laws	R.10 - Customer due diligence	R.11 - Record keeping	R.12 - Politically exposed persons
LC	LC	C	LC	LC	C
R.13 - Correspondent banking	R.14 - Money or value transfer services	R.15 - New technologies	R.16 - Wire transfers	R.17 - Reliance on third parties	R.18 - Internal controls and foreign branches and subsidiaries
C	C	C	C	C	LC
R.19 - Higher-risk countries	R.20 - Reporting of suspicious transactions	R.21 - Tipping-off and confidentiality	R.22 - DNFBPs: Customer due diligence	R.23 - DNFBPs: Other measures	R.24 - Transparency & BO of legal persons
C	LC	LC	PC	LC	LC
R.25 - Transparency & BO of legal arrangements	R.26 - Regulation and supervision of financial institutions	R.27 - Powers of supervision	R.28 - Regulation and supervision of DNFBPs	R.29 - Financial intelligence units	R.30 - Responsibilities of law enforcement and investigative authorities
PC	LC	LC	PC	LC	C
R.31 - Powers of law enforcement and investigative authorities	R.32 - Cash couriers	R.33 - Statistics	R.34 - Guidance and feedback	R.35 - Sanctions	R.36 - International instruments
LC	LC	LC	C	PC	LC
R.37 - Mutual legal assistance	R.38 - Mutual legal assistance: freezing and confiscation	R.39 - Extradition	R.40 - Other forms of international cooperation		
LC	LC	LC	LC		