

THE REPUBLIC OF UGANDA



**NATIONAL STRATEGY FOR COMBATING MONEY LAUNDERING
AND THE FINANCING OF TERRORISM AND PROLIFERATION
FY 2020/21 – FY 2024/25**

September 2020

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LIST OF ACRONYMS

AML	Anti-Money Laundering
AMLA	Anti-Money Laundering Act
CFT	Combating Financing of Terrorism
CPF	Combatting Proliferation Financing
ESAAMLG	Eastern and Southern Africa Anti-Money Laundering Group
FATF	Financial Action Task Force
FIA	Financial Intelligence Authority
FSRBs	FATF Style Regional Bodies
ICRG	International Co-operation Review Group
KRA	Key Result Areas
LCTR	Large Cash Transaction Reports
LEA	Law Enforcement Agencies
MER	Mutual Evaluation Report
MFPED	Ministry of Finance Planning and Economic Development
MOIA	Ministry of Internal Affairs
ML	Money Laundering
MOU	Memorandum of Understanding
NRA	National Risk Assessment
OP	Office of the President
SG	Solicitor General
TF	Terrorism Financing

PF Proliferation Financing (Weapons of mass destruction)

UN United Nations

FOREWORD

Uganda is committed to preventing, detecting and prosecuting money laundering and terrorist financing activities because they have a catastrophic effect on Ugandans, the financial system and the stability of the economy. To this end, Uganda has prepared this national strategy to address these financial crimes. It is with great pleasure that I present the strategy to you.

This strategy has been developed by the Uganda Anti-Money Laundering/Combating Financing of Terrorism (AML/CFT) Taskforce which, is a national taskforce that I set-up as a national coordination mechanism to advise on matters relating to combatting money laundering and terrorist financing. The Taskforce is comprised of representatives, from my Ministry, the Ministry of Internal Affairs, the Ministry of Foreign Affairs, the Ministry of Justice and Constitutional Affairs, and all Government agencies and institutions central to the regulation, enforcement, investigation, and prosecution of money laundering and terrorist financing offences.

The strategy shall guide the coordination of efforts to enhance Uganda's AML/CFT regime and comprises six objectives. These objectives are accompanied by appropriate actions to address identified deficiencies in our AML/CFT framework and mitigate money laundering and financing of terrorism risks. The strategy incorporates a new aspect of proliferation financing which, has been identified internationally as a threat to global security, thus requiring us to develop measures to combat proliferation financing in Uganda.

This strategy represents a revitalised effort in Uganda to safeguard all citizens and the financial sector from the harmful effects of money laundering, terrorism financing and proliferation financing. The strategy has been prepared with the aim of ensuring that Uganda's AML/CFT/CPF regime is aligned to the international standards.

I commend this strategic plan to all stakeholders involved the fight against financial crimes and urge Ugandans to support its implementation.

Hon. Matia Kasaija

Minister of Finance, Planning and Economic Plan

MESSAGE FROM THE CHAIRMAN OF THE AML/CFT TASKFORCE

It is my pleasure to present the National Anti-Money Laundering /Countering Financing of Terrorism/Proliferation Financing (AML/CFT/PF) Strategy for Uganda for the period FY 2020/21 – FY 2024/25.

Uganda and other countries across the world, have been and continue to be threatened and devastated by financial crimes relating to money laundering, terrorist financing and proliferation financing. These crimes are perpetrated by criminals, terrorists and various terrorist organisations. In a bid to ensure national security and integrity of the financial system, Uganda established a legal, policy and institutional framework to address money laundering and terrorist financing. However, we recognize that the legal framework needs to be further strengthened to cater for the new risks that have been brought by technological advancements in order to make it more effective.

Uganda conducted a National Risk Assessment (NRA) of her money laundering (ML) risks and terrorist financing (TF) vulnerabilities in 2017, and was assessed by the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) in 2015 on the efficacy of her Anti-Money Laundering and Combatting Financing of Terrorism regime. Arising from the findings of the afore-mentioned exercises, Uganda identified her ML risks, TF vulnerabilities and weaknesses in her AML/CFT regime that required enhancement.

This strategy has been designed taking into consideration the findings of the NRA and ESAAMLG Mutual Evaluation Assessment to address risks and deficiencies identified in the AML/CFT framework. The is aimed at strengthening the mechanisms for implementing the AML/CFT measures to achieve increased technical compliance and effectiveness in accordance with international standards.

The process of developing the strategy has been consultative and recognises the importance of cooperation and collaboration amongst all key stakeholders. As a

result, the taskforce is indebted to all private sector players and government ministries, departments and agencies that participated in the exercise.

I take this opportunity to thank the members of the Taskforce for the successful completion of this strategy, and appeal to all stakeholders to support its effective implementation over the next five years.

Mr. Patrick Ocailap

Chairman, UAML/CFT Task Force

Ministry of Finance, Planning and Economic Development

NATIONAL STRATEGY FOR COMBATING MONEY LAUNDERING AND THE FINANCING OF TERRORISM AND PROLIFERATION FY 2020/21 – FY 2024/25

Vision

Uganda and its citizens secured against money laundering (ML), terrorist financing (TF), and proliferation financing (PF) by 2025.

Mission

To safeguard Uganda and its citizens against money laundering (ML), terrorist financing (TF), and proliferation financing (PF) by implementing risk-based inter-agency collaboration, against Money Laundering (ML); Terrorist Financing (TF); and Proliferation Financing (PF).

Strategic Objectives:

1. Enhance compliance with the Financial Action Task Force (FATF) Recommendations.
2. Strengthen Uganda's legal and regulatory framework to counter money laundering, terrorism financing and proliferation financing.
3. Strengthen the capacity of stakeholders to implement the AML/CFT/CPF requirements.
4. Enhance regional and international cooperation on matters relating to AML/CFT/CPF.
5. Enhance the investigation, prosecution and adjudication of AML/CFT/CPF matters.

6. Strengthen national coordination and cooperation in AML/CFT/CPF matters.

EXECUTIVE SUMMARY

Uganda is committed to the global fight against Money Laundering (ML), Terrorist Financing (TF) and Proliferation Financing (PF). To this end Uganda has formulated a National Anti-Money Laundering (AML)/Countering Financing of Terrorism (CFT) and Proliferation Strategy to address the deficiencies existing in its AML/CFT regime, and mitigate the Money Laundering (ML), Terrorist Financing (TF) and Proliferation Financing (PF) risks that it is exposed to. The strategy is intended to address the findings of Uganda's money laundering and terrorist financing risk assessment which was conducted in 2017. It also seeks to provide a blueprint for strengthening Uganda's AML/CFT framework over the next five years based on the recommendations arising from the ESAAMLG mutual evaluation assessment report on Uganda's AML/CFT measures.

The Strategy is aimed at achieving the following: -

- i) Ensuring that the recommendations made in Uganda's Mutual Evaluation Report (MER) 2016 to address her AML/CFT deficiencies are implemented;
- ii) Ensuring that the Action Plan that was developed to mitigate the ML/TF risks identified in the National Risk Assessment (NRA) Report 2018 are implemented.
- iii) Ensuring that the international global standards against ML and TF are adhered to.
- iv) Develop and implement a mechanism for Uganda to criminalize and combat proliferation financing of weapons of mass destruction.

The Strategy comprises six key objectives: -

1. Enhance compliance with the Financial Action Task Force (FATF) Recommendations.
2. Strengthen Uganda's legal and regulatory framework to counter money laundering, terrorism financing and proliferation financing.
3. Strengthen the capacity of stakeholders to implement the AML/CFT/PF requirements.
4. Enhance regional and international cooperation on matters relating to AML/CFT/PF.
5. Enhance the investigation, prosecution and adjudication of AML/CFT/PF matters.
6. Strengthen national coordination and cooperation of AML/CFT/PF matters.

Uganda will pursue these objectives over the next five years in order to enhance its AML/CFT regime. The Strategy sets out the appropriate actions required to enhance Uganda's AML/CFT framework and mitigate the known ML and TF risks.

The vision supporting this strategy is ***"to secure the nation and its citizens against money laundering (ML), terrorist financing (TF), and proliferation financing (PF)"***. This will be realized by having in place a robust framework to combat money laundering, terrorism financing and proliferation financing that is consistent with the Financial Action Taskforce (FATF) standards and recommendations.

This vision is combined with the mission aimed at ***"adopting and implementing a multi-stakeholder approach that incorporates the widest range of domestic and international cooperation for the protection of Uganda and her financial system against ML, TF and PF."***

It is envisioned that implementation of this strategy over the next five years by all the stakeholders will enhance Uganda's AML/CFT/PF framework, and will ensure that Uganda and its citizens are protected from the negative impact of ML,TF and PF.

1. INTRODUCTION

1.1. BACKGROUND

Uganda is a member of the Eastern and Southern Africa Anti – Money Laundering Group (ESAAMLG) which was established in 1999. ESAAMLG is an associate member of the Financial Action Task Force (FATF) which was established in 1989. The objectives of the FATF are to develop international standards and promote policies through implementation of legal, regulatory and operational measures to protect the integrity of the of the global financial system against ML, TF and PF. The FATF developed the 40 FATF Recommendations sometimes referred to as the “standards” which all member jurisdictions are obligated to implement in order to ensure that their financial systems are protected against ML, TF and PF.

As an associate member of FATF, ESAAMLG is required to that all its member countries subscribe to the FATF global AML/CFT standards, which is done by conducting mutual evaluation exercises for each of its members to assess the extent to which the 40 FATF standards are being implemented. The mutual evaluations are conducting a methodology that was developed by FATF and the results presented in a mutual evaluation report (MER).

In June 2016, ESAAMLG conducted a mutual evaluation assessment to evaluate Uganda’s AML/CFT regime, and the MER containing the results was adopted by the ESAAMLG Plenary meeting in April 2016. The report identified Uganda’s strategic AML/CFT deficiencies, and based on the FATF methodology found the “Effectiveness” of Uganda’s AML/CFT to be “Low”. Uganda’s effectiveness in achieving the “Immediate Outcomes (IOs)” of the FATF was low for all eleven (11) outcomes. The Uganda MER 2016 provided recommendations for Uganda to address the deficient areas in her AML/CFT regime. In December 2019, the FATF conducted a Post Observation Period assessment and assessed that Uganda had not made tangible progress in addressing her deficiencies and determined that Uganda be placed on the FATF observation grey list. As a result

of being placed on the list, Uganda is subject to monitoring by the International Cooperation Review Group (ICRG) of the FATF. The ICRG drew up an action plan for Uganda to implement in order to enhance the effectiveness of her AML/CFT Regime. One of the requirements of the action plan is that Uganda adopts a national strategy focused on addressing AML/CFT/CPF matters.

It is against this background that this strategy has been developed. The National Strategy to Combat Money Laundering, Financing of Terrorism and Proliferation provides the approach which Uganda has adopted to tackle ML, TF and PF over the next five years. It also presents Uganda's priorities and objectives in adhering to international standards and obligations set by the Financial Action Taskforce (FATF). The strategy is informed by the findings of two significant reports namely; the ESAAMLG Mutual Evaluation Report (MER) of April 2016, and the National Risk Assessment (NRA) 2017 Report of Uganda's ML and TF risk at national and sectorial levels.

The purpose of the strategy is to develop a consolidated vision and strategy for improving the AML/CFT regime in Uganda with the ultimate goal of securing Uganda and its citizens from potential damage and havoc arising from ML and TF. Additionally, the strategy aims at safeguarding Uganda from a global emerging risk and threat of proliferation financing. The Uganda MER identified that Uganda does not have a regime to address proliferation financing and recommended that Uganda develops and implements a mechanism to address issues related to PF.

1.2. Situational Analysis

In February 2020, the Financial Action Taskforce (FATF) placed Uganda on the list of countries identified as having strategic AML/CFT deficiencies. Subsequently, Uganda made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime. The commitment was made to the FATF by Hon. Matia Kasajja, the Minister of Finance Planning and Economic Development in a letter addressed to the FATF

President (dated 11th February, 2020, wherein he confirmed Uganda's commitment to address Uganda's deficiencies by implementing the action plan drawn by the FATF requiring Uganda to:-

- (i) adopt a national AML/CFT strategy;
- (ii) seek international cooperation in line with the country's risk profile;
- (iii) develop and implement risk-based supervision to FIs and DNFBPs;
- (iv) ensure that competent authorities have timely access to accurate basic and beneficial ownership information for legal entities;
- (v) demonstrate that LEAs and judicial authorities apply the ML offence consistent with the identified risks;
- (vi) establish and implement policies and procedures for identifying, tracing, seizing and confiscating proceeds and instrumentalities of crime;
- (vii) demonstrate that LEAs conduct TF investigations and pursue prosecutions commensurate with Uganda's TF risk profile;
- (viii) address the technical deficiencies in the legal framework to implement PF-related TFS and implementing a risk-based approach for supervision of its NPO sector to prevent abuse for TF purposes.

Uganda committed to ensuring that all the action items are completed by January 2022, which deadlines have been extended by four months due to challenges presented by the Corona pandemic. The action items therefore all to have to be addressed by May 2022.

Based on FATF's identification of Uganda as a country having strategic deficiencies in its AML/CFT regime, in May 2020, the European Union (EU) placed Uganda on its list of third countries presenting strategic deficiencies in their AML/CFT regimes which pose significant threat to the financial system of the EU. It is a requirement for Uganda to be removed from the FATF list before the EU can consider removing Uganda from its list.

This strategy takes cognizance of the fact Uganda is globally identified as a country with strategic deficiencies in her AML/CFT regime, and seeks to ensure that all deficiencies are addressed and that Uganda is delisted from the FATF and EU list.

1.2.1.The Ugandan AML/CFT/ PF Regime

1.2.1.1 Uganda criminalized money laundering through the enactment of the Anti-Money Laundering Act, 2013. In December 2015, the Anti-Money Laundering Regulations of 2015 were issued. These formed the basis for the AML regime which is based on and supported by the following laws and regulations: -

- i) Anti-Money Laundering Act, 2013
- ii) Anti-Money Laundering Regulations 2015
- iii) Anti-Money Laundering (Amendment) Act, 2017
- iv) Anti-Money Laundering (Exchange of Information) Regulations 2018
- v) Anti-Money Laundering (Amendment) Act 2019
- vi) Financial Institutions (Amendment) Act, 2016
- vii) Capital Markets Authority (Amendment) Act, 2016
- viii) Insurance Act 2017
- ix) Narcotics and Psychotropic Substances (Control) Act, 2016
- x) Tier 4 Microfinance Institutions and Money Lenders Act, 2016
- xi) Lotteries and Gaming Act 2016
- xii) Penal Code Act 1950
- xiii) Inspectorate of Government Act, 2002

1.2.1.2 Uganda criminalized Terrorist Financing by amending the Anti-Terrorism Act 2002 and enacting the Anti-Terrorism Act, 2015. The CTF regime is based on and is supported by the following legislation.

- i) Anti-Terrorism Act 2002
- ii) Anti-Terrorism (Amendment) Act 2015
- iii) Anti-Terrorism Regulations 2015
- iv) Anti-Terrorism Regulations 2016

v) Anti-Terrorism (Amendment) Act 2017

1.2.1.3 Proliferation financing is not yet criminalized in Uganda. One of the objectives of this national strategy is to ensure that a legal regime is enacted to address proliferation financing.

1.2.2.Key stake holders and supervisors.

The ecology of the AML/CFT/CPF regime is comprised of various stakeholders who take lead in overseeing development and establishment of the AML/CFT/CPF regime, licensing and supervising entities that contribute and affect the financial sector and system, and those involved in law enforcement, investigation and prosecution of ML, TF and PF.

The table below highlights the key entities and stakeholders in the AML/CFT/CPF regime.

	Institution	Role/Responsibility
1	Ministry of Finance, Planning and Economic Development	Sets AML Policy, strategy and regulatory framework
2	Bank of Uganda	Financial Sector Regulator and supervisor for AML/CFT compliance.
3	Ministry of Lands, Housing and Urban Development	Sets policy for land and real estate transactions.
4	National Lotteries & Gaming Board	Regulator of Lotteries and gaming and supervisor of AML/CFT compliance
5	Ministry of Justice and Constitutional Affairs	Drafting laws and regulations on AML/CFT
6	Institute of Chartered Public Accountants Uganda	Regulating and Supervising Accountants on their compliance with AML/CFT
7	Insurance Regulatory Authority	Regulating and supervising Insurance sector on AML/CFT.
8	External Security Organization	Gathers intelligence information on possible launders and financiers of terrorism.
9	Internal Security Organization	Gathers intelligence information on possible launders and financiers of terrorism.

10	Uganda Wild Life Authority	Law enforcement Authority for wildlife crimes
11	Uganda Revenue Authority	Law enforcement Agency for receiving intelligence reports from FIA on tax related crimes
12	Uganda Registration Services Bureau	Licensing all companies operating in Uganda which where FIA confirms operations of some businesses.
13	Directorate of Public prosecutions	Prosecutes money laundering cases
14	Capital Markets Authority	Regulates and supervises Securities Market sector against ML/TF
15	Ministry of Foreign Affairs	Policy and enforcement of United Nations Security Council Resolutions.
16	Uganda Police Force	Investigates ML/TF cases
17	Inspectorate of Government	Investigates corruption cases which generates proceeds which are laundered
18	Ministry of Internal Affairs	Enforces control of cross border movement of funds and other crimes
19	Non-Government Organizations Bureau	Regulates and supervises NGOs against ML/TF
20	Office of the President - Directorate of Ethic and Integrity	Government Ministry through which the Minister for the Presidency on behalf of the Executive provides leadership in public policy management and good governance for National Development.
21	All accountable Persons as mentioned in the Second schedule of the AMLA 2013	Roles and responsibilities of each are indicated in the AML Regulations 2015 and guidelines and guidance notes for each category.

1.2.3 Mutual Evaluation Report (MER) 2016

Uganda's level of technical and effective compliance was assessed against the 40 FATF Recommendations during a mutual evaluation exercise that was undertaken by ESAAMLG from 15th - 26th of June, 2015. The Mutual Evaluation Report (MER) of the findings was adopted by the FATF in April 2016. The MER analysed Uganda's level of compliance with the FATF 40 Recommendations and

the level of effectiveness of the AML/CFT system and made recommendations on how the system could be strengthened.

With respect to technical compliance with the 40 FATF Recommendations, the MER found that Uganda was:-

- i) Largely Compliant (LC) with 1 Recommendation
- ii) Compliant (C) with 4 Recommendations
- iii) Partially Compliant (PC) with 14 Recommendations,
- iv) Non-Compliant (NC) with 21 Recommendations

The table below summarizes findings of the MER

TABLE 1: Recommendations rated NC & PC

Rated NC
R1, R5, R6, R7, R8, R11, R12, R15, R16, R17, R18, R19, R20, R24, R25, R26, R27, R28, R32, R33, R39
Rated PC
R2, R3, R10, R14, R22, R23, R29, R30, R31, R34, R35, R37, R38, R40

With respect to effectiveness Uganda was assessed as low on all the eleven Immediate Outcomes

TABLE 2: Immediate Outcome levelled Low

IO1, IO2, IO3, IO4, IO5, IO6, IO7, IO8, IO9, IO10

In June 2018, Uganda submitted a request to ESAAMLG for technical compliance re-ratings. Uganda sought technical compliance re-ratings on 16 Recommendations: Recs. 1, 5, 6, 11, 12, 15, 16, 17, 18, 19, 20, 26, 27 (originally rated NC) and Recs.3, 10 and 29 (originally rated PC).

Uganda was re-rated on 13 areas, and the rating on three areas remained the same.

R #	Recommendation	Previous Rating	New Rating
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1	Assessing risks and applying a risk-based approach	NC	PC
3	Money Laundering offence	PC	C
5	Terrorist Financing offence	NC	C
6	Targeted Financial Sanctions related to terrorism and TF	NC	C
10.	Customer Due Diligence	PC	LC
11	Record keeping	NC	C
12	Politically Exposed Persons	NC	PC
15	New technologies	NC	PC
16	Wire transfers	NC	C
17	Reliance on third parties	NC	C
18	Internal Controls and foreign branches and subsidiaries	NC	C
19	High risk countries	NC	PC
20	Reporting suspicious transactions	NC	C
27	Powers of Supervisory Authorities	NC	PC
The following recommendations were not re-rated			
6	Targeted financial sanctions related to terrorism and terrorist financing	NC	NC
26	Regulation and supervision of financial institutions	NC	NC

29	FIUs	PC	PC
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As a result of the re-rating, Uganda’s technical compliance is reflected as follows:

Table of Summary of Ratings on each of the FATF Recommendations, after the Re-ratings.

	Compliant (C)	Largely Compliant (LC)	Partially Compliant (PC)	Non- Compliant (NC)
Rec	R.3, R.5, R.9, R.11, R.13, R.16, R.17, R.18, R.20, R.21, R.36	R.4	R.1, R.2, R.10 R.12, R.14, R.15, R.19, R.22, R.23, R.27, R.29, R.30, R.31, R.34, R.35, R.37, R.38, R.40	R.6, R.7, R.8, R.24, R.25, R.26, R.28, R.32, R.33, R.39
Ratings Scored	11 - Cs	1 - LCs	18 - PCs	10 - NCs

Uganda was rated ‘low’ against all the 11 objectives (Immediate Outcomes) as indicated below: -

IO.1	Risk, policy and coordination	Low
IO.2	International cooperation	Low
IO.3	Supervision	Low
IO.4	Preventive measures	Low

IO.5	Legal persons and arrangements	Low
IO.6	Financial Intelligence	Low
IO.7	ML investigation & prosecution	Low
IO.8	Confiscation	Low
IO.9	TF investigation & prosecution	Low
IO.10	TF preventive measures & financial sanctions	Low
IO.11	PF financial sanctions	Low

1.2.4 National Risk Assessment (NRA) 2017 Report

A National Risk Assessment of Uganda’s Money Laundering (ML) and Terrorism Financing (TF) risks was undertaken in 2016. The assessment sought to analyze the ML threat to which Uganda is exposed and the major predicate offenses that generate larger amounts of criminal proceeds, and the level of the TF threat that the country faces. It also examined the country’s ML/TF combating ability and the vulnerabilities of the financial sector as well as designated non-financial business and professions (DNFBPs) to ML and TF abuse, and financial inclusion. The NRA assessed how criminals utilize the ill-gotten funds and the methods they use to launder criminal proceeds. Furthermore, the NRA analyzed the methods with which terrorist organizations raise and move terrorist funds.

The NRA of Uganda was undertaken by a Working Group representing various government and private institutions, and coordinated by the Financial Intelligence Authority (FIA). The Working Group established nine teams to cover the following areas: ML Threat, TF Threat and Vulnerability, National ML Vulnerability, Banks, Insurance, Securities, Other Financial Institutions (OFIs), DNFBPs and Financial Inclusion.

The assessment used a methodology developed by the World Bank and benefited from the additional technical assistance provided by the SUGAR project. It relied on both quantitative information (statistics, data and various reports, both

domestic and international) and qualitative information, such as surveys and interviews, including with law enforcement and intelligence agencies, supervisory organs, financial and non-financial institutions, which complemented the information and data provided by the members of the Working Group.

It was completed in September 2017 and it forms the basis of Uganda's risk-based approach to addressing ML and TF risks.

The key results of the NRA were disseminated to the public and the private sector in March 2018.

Key findings from the National Risk Assessment

a) Analysis of the ML threat

The analysis of the ML threat showed that at domestic level, the most proceeds-generating predicate offences are corruption, fraud, tax crimes and counterfeiting of goods.

At external/trans-national level that is the predicate offences committed outside Uganda and the proceeds laundered in or through Uganda – the most proceeds-generating predicate offences are smuggling, wildlife offences, drug trafficking and human trafficking.

The analysis of the threat at sectorial level and the analysis of the most common ML methods show that the real estate sector poses the highest ML threat.

The threat analysis concerning the financial sector presents different degree of ML threat, with securities posing the lowest ML threat and other financial

institutions such as money lenders, money for value transfers and forex exchange the highest, with banks posing a medium-high risk to ML.

b) Analysis of the terrorism and TF threat and national vulnerability

The NRA indicated that the overall threat of terrorist financing is Medium High (MH) as a combination of the external threat, which carries a higher risk rating (High) versus the internal threat which is lower (Medium). All terrorist organizations that pose a risk to Uganda are based outside the country.

The analysis of the sectorial TF risk shows some risk in the banking sector, although the higher risk lies with other types of financial institutions (such as FOREX and MTV firms), real estate and in some financial inclusion products.

The analysis of some of the financial inclusion-related products (in particular mobile money international remittances and mobile money person-to-person transfers) shows that the vulnerability of mobile money products to TF risk is high.

The NRA Report highlighted some of Uganda's AML/CFT vulnerabilities as follows:

- i) Highly cash-based economy
- ii) Resource constraints of the FIA and Law Enforcement Agencies
- iii) Inadequate AML/CFT statistics
- iv) Ineffective AML/CFT supervision
- v) Lack of parallel financial crime investigations
- vi) Weakness in border controls
- vii) Inadequate beneficial ownership requirements
- viii) Limited AML/CFT awareness
- ix) Unreliable identification infrastructure
- x) Unregulated sectors such as real estate

xi) Weak AML/CFT oversight

The NRA highlighted the ML/TF risk exposure posed by each sector as follows:

Sector	ML Risk	TF Risk
Banking	Medium High	Medium
Insurance	Medium	Low
Securities	Medium Low	Low
Other Financial Institutions		
i) Forex	High	High
ii) MVTs	High	Medium High
iii) Money lending	Medium High	Medium
iv) Microfinance institutions	Medium High	Low
v) Financial inclusion products	Medium High	High
DNFBPs		
i) Real Estate	High	High
ii) NGOs	Medium Low	Medium
iii) Casinos	High	
iv) Lawyers	High	
v) Dealers in precious metals	High	
vi) Accountants	Medium	

Based on the findings of the NRA, an action plan was developed for Uganda to address the threats and vulnerabilities identified by the assessment, and it advises components of this strategy.

2. RATIONALE, VISION AND MISSION

2.1. RATIONALE

The National Anti-Money Laundering (AML)/Countering Financing of Terrorism (CFT) Strategy portrays the approach that Uganda will employ to address the nations' ML/TF/PF deficiencies over the next five years. It provides Uganda's steps and objectives in dealing with the global evils, and enhancing her adherence to international standards set by the FATF.

The Strategy is informed by the findings of the NRA and MER reports, and is anchored Uganda's commitment to enhancing its AML/CFT/PF framework over the next five years. Uganda intends to address the deficiencies (where it falls short of the international standards) as identified by the MER, and the risks identified by the National Risk Assessment Report 2018 by enforcing and implementing this national strategy.

2.2. VISION

The vision for the Republic of Uganda is to secure the nation and its citizens against money laundering (ML), terrorist financing (TF), and proliferation financing (PF). This will be realized by having in place a robust framework to combat money laundering, terrorism financing and proliferation financing that is consistent with the Financial Action Taskforce (FATF) standards and recommendations.

2.3. MISSION STATEMENT

To adopt and implement a multi- stakeholder approach that incorporates the widest range of domestic and international cooperation for the protection of Uganda and her financial system against ML, TF and PF.

2.4. STRATEGIC OBJECTIVES

Being guided by the above stated mission and vision, Uganda aims at enhancing its AML/CFT/CPF framework and addressing her deficiencies by embarking on a course of action(s) comprised of the following six objectives:-

1. Enhance compliance with the FATF Recommendations.
2. Strengthen Uganda's legal and regulatory framework to counter money laundering, terrorism financing and proliferation financing.
3. Strengthen the capacity of stakeholders to implement the AML/CFT/PF requirements.
4. Enhance regional and international cooperation on matters relating to AML/CFT/PF.
5. Enhance the investigation, prosecution and adjudication of AML/CFT/PF matters.
6. Strengthen national coordination and cooperation of AML/CFT/PF matters.

3. STRATEGIC OBJECTIVES AND AREAS OF INTERVENTION

3.1. Enhance compliance with FATF Recommendations

Action Person: All Supervisory Authorities, FIA, URSB, IG, ODPP, SG, MofPED, AML/CFT Taskforce.

Actions:

- i) Conduct risk-based assessments across all sectors.
- ii) Complete the ML/TF risk assessment of legal persons and arrangements.
- iii) Complete the TF risk assessment for the NPO sector and based on the results develop outreach and monitoring plans for higher risk NPOs.
- iv) Share the results of the risk assessment with private sectors and competent authorities.
- v) Enhance transparency of legal persons and arrangements by augmenting beneficial ownership requirements.
- vi) Demonstrate that competent authorities have timely access to accurate, basic and beneficial ownership information for legal entities (held by the company registry and/or by regulated entities).
- vii) Strengthen and implement the system of sanctions for violations of beneficial ownership transparency obligations.
- viii) Ensure that all gaps in relation to licensing or registration requirements are addressed.
- ix) Develop and implement comprehensive risk-based supervision of the financial and DNFBP sectors.
- x) Develop and implement risk-based approach supervision manuals.
- xi) Provide supervisory staff with adequate resources and training in AML/CFT supervision.

- xii) Provide guidance to accountable persons on proper implementation of AML/CFT obligations especially in respect of ML/TF risk assessment/CDD/TFS and STRs.
- xiii) Conduct outreach to regulated entities to improve compliance with AML/CFT obligations, including CDD/EDD checks for high-risk clients.
- xiv) Implement risk-based monitoring procedures eg onsite and offsite inspections.
- xv) Take remedial actions and apply proportionate and dissuasive sanctions for non-compliance.
- xvi) Increase diversity of STR reporting to ensure that high risk accountable persons detect and file STRs consistent with their risk profile.
- xvii) Establish and operationalize an authority for administering and managing seized and confiscated assets.
- xviii) Establish comprehensive and standardized policies and procedures for identifying, tracing, seizing and confiscating proceeds and instrumentalities of crime, and demonstrate their application through case studies and statistics.

3.2 Strengthen Uganda's legal and regulatory framework to counter money laundering, terrorism financing and proliferation financing

Action Person: FIA, All Supervisors, AML/CFT Taskforce, MofPED, SG, MOIA

Actions:

- i) Implement a targeted financial sanctions framework related to the financing of proliferation framework related to the financing of proliferation of weapons of mass destruction (Rec. 7).
- ii) Develop and implement a legal framework and regime to criminalize and counter proliferation.
- iii) Establish and implement a legal framework that criminalizes proliferation financing.
- iv) Develop and issue appropriate guidance for accountable persons.

- v) Develop and implement an administrative fines framework for breaches of AML/CFT obligations which are effective, proportionate and dissuasive.

3.3. Strengthen the capacity of stakeholders to implement the AML/CFT/PF requirements

Action Person: All Supervisors, FIA

Actions:

- i) Ensure adequate staffing and training for all supervisory authorities.
- ii) Provide staff with adequate resources and training in AML/CFT training.
- iii) Raise AML/CFT awareness among all stakeholders and public.
- iv) Identify AML/CFT knowledge gaps across the public and private sectors.
- v) Develop appropriate training programs in the public and private sectors.
- vi) Design and deliver programs for raising awareness on AML/CFT matters with relevant stakeholders.
- vii) Conduct outreach to accountable persons to ensure better understanding of ML/TF risks. Expand scope of outreach to include TV, Radio and print campaigns.
- viii) Implement an effective AML/CFT data collection and maintenance system by all accountable persons and stakeholders.
- ix) Increase awareness on PF-related TFS by:
 - a) Providing written guidance to obliged entities on the implementation of targeted financial sanctions related to PF
 - b) Conducting training for FIs and DNFBOS on TFS.

3.4. Enhance regional and international cooperation and coordination efforts on matters relating to AML/CFT

Action Person: IG, ODPP, FIA, UPF, AML/CFT Taskforce

Actions:

- i) Collect and maintain comprehensive statistics for MLA and other forms of international cooperation, ensuring outbound and inbound requests are actioned in a timely and effective manner.
- ii) Seek MLA and other forms of international cooperation for ML, TF and high-risk predicates (e.g. corruption, fraud, smuggling of wildlife products and gold, drug trafficking) in line with Uganda's risk profile.
- iii) Establish joint working groups and taskforces to deal with particular large cases and high priority areas.
- iv) Develop coordination mechanisms between competent authorities.
- v) Carry out regular reviews on the effectiveness of working arrangements and take action on deficiencies found.
- vi) Review and enhance domestic arrangements for handling international cooperation, including mutual legal assistance, intelligence and asset recovery.
- vii) Ensure that accurate and accessible AML/CFT statistical data is maintained by all competent authorities and that quantitative and qualitative analysis of the data is undertaken on a regular basis.
- viii) Ensure that all outbound and inbound AML/CFT MLA requests are actioned in a timely and effective manner.
- ix) Ensure that the relevant agencies have adequate resources to deal expeditiously with exchange of information and MLA requests.

3.5. Enhance the investigation, prosecution and adjudication of AML/CFT/PF

Action Person: IG, ODPP, FIA, UPF, AML/CFT Taskforce

Actions:

- i) Train LEAs, the ODPP and the judiciary in the application of the ML offence (as amended in 2017).
- ii) Train LEAs to detect or identify TF and TF related activity.
- iii) Demonstrate (through statistics and case studies) that authorities are pursuing ML investigations and prosecutions and are seeking to apply ML charges, consistent with the risks identified in the NRA.
- iv) Demonstrate (including through case studies and statistics) the ability to successfully conduct TF investigations and pursue prosecutions commensurate with Uganda's TF risk profile.
- v) Enhance the investigation and prosecution of ML/TF offences and ensure that offenders are sanctioned, penalized and deprived of illicit proceeds of crime.
- vi) Strengthen the internal capabilities of the FIU to ensure that high quality and useful intelligence is available to enhance investigations.
- vii) Engage with foreign counterparts, from a bilateral and/or regional perspective.
- viii) Assign/appoint official persons or points of contact for all key stakeholders.
- ix) Ensure that foreign counterparts can easily identify appropriate points of contact.
- x) Explore mechanisms, in consultation with the private sector, that would facilitate more rapid access to financial information.
- xi) Establish and maintain effective methods of record keeping for all statistics.

3.6. Strengthen national coordination and cooperation of AML/CFT/PF matters.

Action Person: AML/CFT Taskforce, MoFPED, FIA, ODPP, UPF, URA, CMA, IRA, BOU, UWA

Action:

- i) Introduce AML/CFT policies and action plans informed by risk, which will also assist in prioritization of allocation of resources in addressing the identified ML/TF risks.
- ii) Authorities to come up with policies which encourage better coordination on investigations and prosecutions of ML/TF cases, particularly where corruption is involved.
- iii) Authorities to put in place policies to facilitate cooperation and coordination of confiscation of proceeds of crime between LEAs, prosecution and the courts.
- iv) To strengthen national and regional cooperation against wildlife trafficking and related financial flows.

4. IMPLEMENTATION PLAN

4.1 Implementation of roles and responsibilities Implementers and stakeholders

The Ministry of Finance, Planning and Economic Development (MOFPED) oversees Uganda's AML/CFT regime. The Financial Intelligence Authority (FIA) as established by the Anti-Money Laundering Act, 2013 (AMLA), is the authority responsible for detecting, preventing and combatting money laundering in the country in conjunction and collaboration with various competent authorities. Uganda seeks to implement the strategy by enhancing the capacity and efficiency of MOFPED, FIA, competent authorities and other stakeholders to handle AML/CFT matters. In keeping with the mission statement, a multi stakeholder approach will be the focus of driving and implementing this strategy. The Strategy emphasizes the need for involving and coordination initiatives with a wide range of stakeholders who include Ministries, policy makers, supervisors, law enforcement, Government Agencies etc.

The strategic objectives will be achieved through targeted actions with specific timelines indicated in the Implementation Table hereto attached as ANNEX 1. The Table clearly indicates the specific tasks and outputs that are expected from identified stakeholders. Much of the work will require the active participation of private and public sectors, financial institutions as well as other public and private non-financial entities. Success will be achieved through enhanced collaboration amongst the following who include members of the Uganda Anti-Money Laundering / Countering Financing Terrorism Taskforce (Taskforce) that was set up by the Minister of Finance, Planning and Economic Development.

4.2. List of stakeholders and implementers.

- 1) Ministry of Finance Planning and Economic Development (MFPED)
- 2) Ministry of Internal Affairs (MoIA)
- 3) Ministry of Foreign Affairs MoFA)
- 4) Ministry of Lands Housing and Urban Development (MoLHUD)
- 5) Ministry of Energy and Mineral Development
- 6) Ministry of Justice and Constitutional Affairs (MoJCA)
- 7) Office of the President (OP)
- 8) Office of the Director of Public Prosecutions (ODPP)
- 9) Financial Intelligence Authority (FIA)
- 10) Bank of Uganda (BOU)
- 11) Capital Markets Authority (CMA)
- 12) Insurance Regulatory Authority (IRA)
- 13) Uganda Microfinance Regulatory Authority (UMRA)
- 14) Uganda Police Force (UPF)
- 15) Uganda Revenue Authority (URA)
- 16) Uganda Registration Services Bureau (URSB)
- 17) Uganda Wildlife Authority (UWA)
- 18) Inspectorate of Government (IG)
- 19) Uganda Bankers Association (UBA)
- 20) Uganda Insurers Association (UIA)
- 21) Lotteries and Gaming Regulatory Board
- 22) ICPAU
- 23) ISO
- 24) ESO
- 25) The Uganda AML/CFT Taskforce (Taskforce)

5. MONITORING AND EVALUATION FRAMEWORK

Monitoring and evaluation of the Strategic Plan

The Taskforce with support from MOFPED shall oversee the implementation of the national strategy.

In order to ensure that this strategy is efficiently implemented, its progress shall be reviewed on a monthly basis and monthly meetings shall be held by the Taskforce for the purpose.

The review will assess the progress, identify challenges and determine remedial actions required to be undertaken. The findings of the quarterly review will be used to source for additional resources and technical support where they are required.

The Taskforce shall provide quarterly updates to the Minister of Finance on progress made.

6. CONCLUSION

The implementation of this strategy and attainment of its objectives is projected to combat money laundering and terrorism financing in Uganda. Furthermore, it will enhance Uganda's compliance with the international standards set to combat the global evils.

With respect to stakeholders, it highlights the priority areas and key objectives that each must achieve in order to address the nations deficiencies and risks with regard to money laundering and terrorist financing. It further sets a

reference point for policy makers, regulators, and competent authorities to ensure the application of a risk-based approach in addressing Uganda's identified risks and vulnerabilities over the next five years.

ANNEX 1				
IMPLEMENTATION AND MONITORING MATRIX				
Strategic intervention	Action Item	Expected Output	Timeline/ Schedule	Responsible Centre/ Lead Institution
Enhance compliance with FATF Recommendations.	1. Complete the ML/TF risk assessment of legal persons and arrangements.	Risk Assessment Report	January 2021	FIA & URSB
	2. Complete the TF risk assessment for the NPO sector and based on the results develop outreach and monitoring plans for higher risk NPOs.	Risk Assessment Report	September 2021	NGO Bureau & FIA
	3. Share the results of the risk assessments with private sectors and competent authorities.	<ul style="list-style-type: none"> - Dissemination workshop - Published Report - Online availability of the report 	May 2021	FIA, URSB & NGO Bureau
	4. Enhance transparency of legal persons and arrangements by augmenting beneficial ownership requirements.	<ul style="list-style-type: none"> - Amendment of the Companies Act, Trusts Act & Trustees Incorporation Act 	September 2021	URB & Ministry of Lands
	5. Ensure that competent authorities have timely access to accurate, basic and beneficial ownership information for legal entities (held by the company registry and/or by regulated entities).	Mechanism for timely access to accurate, basic and beneficial ownership information for legal entities (held by the company registry	September 2021	URB & Ministry of Lands

		and/or by regulated entities) in place		
	6. Strengthen and implement the system of sanctions for violations of beneficial ownership transparency obligations.	Amendment of the companies Act, Trusts Act & Trustees Incorporations Act to prescribe the sanctions Regime in place	January 2022	URB & Ministry of Lands
	7. Ensure that all gaps in relation to licensing or registration requirements are addressed. i. Trusts ii. Real Estates	- Amendment of Trusts Act & Trustees Incorporations Act - Enactment of the Real Estates and Management Act	June 2023	Ministry of Lands
	8. Develop and implement risk-based approach supervision manuals.	- Risk based supervision manuals adopted by all Supervisors	June 2021	All Supervisors
	9. Provide supervisory staff with adequate resources and training in AML/CFT supervision.	Improved knowledge in AML/CFT supervision	May 2021	All Supervisors

	10. Issue guidelines to accountable persons on proper implementation of AML/CFT obligations especially in respect of ML/TF risk assessment/CDD/TFS and STRs.	Guidelines issued	June 2021	All supervisors & Ministry of Internal Affairs
	11. Conduct outreach to regulated entities to improve compliance with AML/CFT obligations, including CDD/EDD checks for high-risk clients.	Improved compliance with AML/CFT obligations	May 2021	May 2021
	12. Implement risk-based monitoring procedures e.g onsite and offsite inspections.	Risk-based monitoring procedures implemented	September 2021	All Supervisors
	13. Take remedial actions and apply proportionate and dissuasive sanctions for non-compliance.	Sanctions regime for non-compliance implemented	January 2022	All Supervisors
	14. Increase diversity of STR reporting to ensure that high risk accountable persons detect and file STRs consistent with their risk profile.	Enhance capacity of high risk FI's and DNFBPs to detect and file STR's consistent with their risk profile.	January 2022	All Supervisors
	15. Establish and operationalize an authority for administering and managing seized and confiscated assets.	Enactment of the Assets Recovery Act	June 2024	Department of Ethics & Integrity
	16. Establish comprehensive and standardized policies and procedures for identifying, tracing, seizing and confiscating proceeds and instrumentalities of crime, and	Standardized policies and procedures for identifying, tracing, seizing and confiscating	September 2021	FIA IG DPP

	demonstrate their application through case studies and statistics.	proceeds and instrumentalities of crime in place		Uganda Police Forces
Strengthen Uganda's legal and regulatory framework to counter money laundering, terrorism financing and proliferation financing.	1. Uganda should address the remaining technical deficiencies in its legal and institutional framework to implement a targeted financial sanctions framework related to the financing of proliferation framework related to the financing of weapons of mass destruction (Rec 7).	Targeted financial sanctions framework related to the financing of proliferation framework related to the financing of proliferation of weapons of mass destruction implemented	September 2021	Ministry of Internal Affairs
	2. Develop and implement a legal framework and regime to criminalize and counter proliferation.	Enactment of a law to criminalise and counter proliferation	September 2021	Ministry of Internal Affairs
	3. Develop and issue appropriate guidance for accountable persons on proliferation.	Guidelines on PF issued	May 2021	Ministry of Internal Affairs
	4. Develop and implement an administrative fines framework for breaches of AML/CFT obligations which are effective, proportionate and dissuasive.	Administrative fines prescribed	June 2021	FIA and Ministry of Internal Affairs
Strengthen the capacity of stakeholders to implement the	1. Ensure adequate staffing and training for all supervisory authorities.	Adequate staffing and training resources for staff of supervisory authorities	June 2024	All Supervisors

AML/CFT/PF requirements.	2. Provide staff with adequate resources and training in AML/CFT training.	Improved AML/CFT knowledge for stakeholders	June 2024	All stakeholders
	3. To raise AML/CFT awareness among all stakeholders and public.	Increased awareness of AML CFT/Matters		FIA
	4. To identify AML/CFT knowledge gaps across the public and private sectors.	AML/CFT Knowledge gaps identified	December 2020	All stakeholders
	5. To design and deliver programs for raising awareness on AML/CFT matters with relevant stakeholders.	AML/CFT awareness programs designed and delivered	June 2025	All supervisors
	6. To conduct outreach to accountable persons to ensure better understanding of ML/TF risks. Expand scope of outreach to include TV, Radio and print campaigns.	Improved public understanding of ML/TF risks	June 2025	FIA
	7. To implement an effective AML/CFT data collection and maintenance system by all accountable persons and stakeholders.	Effective AML/CFT data collection and maintenance system in place	June 2023	All supervisors

	3. Establish joint working groups and taskforces to deal with particular large cases and high priority areas.	Particular cases and high priority areas handled by joint working groups	June 2025	UPF, ODPP, IG, MoIA
	4. Develop coordination mechanisms between competent authorities.	Coordination mechanisms between competent authorities in place (MOUs, Partnership agreements, framework agreement)	June 2024	All competent authorities
	5. Carry out regular reviews on the effectiveness of working arrangements and take action on deficiencies found.	Effectiveness of working groups reviewed	Monthly basis	UAML/CFT Taskforce
	6. Review and enhance domestic arrangements for handling international cooperation, including mutual legal assistance, intelligence and asset recovery.	International cooperation, including mutual legal assistance, intelligence and asset recovery enhanced.	June 2025	FIA, IG, ODPP, UPF, MoIA
	7. Ensure that accurate and accessible AML/CFT statistical data is maintained by all competent authorities and that quantitative and qualitative analysis of the data is undertaken on a regular basis.	Accurate and accessible AML/CFT statistical data is maintained	Monthly	FIA, IG, ODPP, UPF, MoIA
	8. Ensure that all outbound and inbound AML/CFT MLA requests are actioned in a timely and effective manner.	AML/CFT MLA requests actioned in a timely and effective manner.	June 2022	FIA, IG, ODPP, UPF, MoIA

	9. Ensure that the relevant agencies have adequate resources to deal expeditiously with exchange of information and MLA requests.	Adequate resource allocation for exchange of information and MLA requests.	Annual	MoFPED
Enhance the investigation, prosecution and adjudication of AML/CFT/PF	1. Train LEAs, the ODPP and the judiciary in the application of the ML offence (as amended in 2017).	Capacity of LEAs, ODPP and judiciary in application of ML offence enhanced	May 2021	UPF, ODPP, Judiciary
	2. Train LEAs to detect or identify TF and TF related activity.	Capacity of LEAs, MoIA, to detect TF and TF related activity enhanced.	May 2021	UPF, MoIA, FIA
	3. Demonstrate (through statistics and case studies) that authorities are pursuing ML investigations and prosecutions and are seeking to apply ML charges, consistent with the risks identified in the NRA.	ML investigations and prosecutions pursued.	May 2021	ODPP, IG, UPF, URA
	4. Demonstrate (including through case studies and statistics) the ability to successfully conduct TF investigations and pursue prosecutions commensurate with Uganda's TF risk profile.	TF investigations and prosecutions pursued	January 2022	MoIA, UPF
	5. Enhance the investigation and prosecution of ML/TF offences and ensure that offenders are sanctioned, penalized and deprived of illicit proceeds of crime.	ML &TF investigations and prosecutions conducted, offenders sanctioned, penalized and deprived of proceeds of crime.	June 2025	UPF, MoIA, ODPP

	6. Strengthen the internal capabilities of the FIU to ensure that high quality and useful intelligence is available to enhance investigations.	FIA capacity enhanced.	June 2022	MOFPED, FIA
	7. Engage with foreign counterparts, from a bilateral and/or regional perspective.	Bilateral and regional cooperation enhanced.	June 2023	All competent authorities
	8. Assign/appoint official persons or points of contact for all key stakeholders.	Focal persons nominated	December 2020	All stakeholders
	9. Ensure that foreign counterparts can easily identify appropriate points of contact.	Focal points of contact for foreign counterparts nominated	December 2020	All competent authorities
	10. Explore mechanisms, in consultation with the private sector, that would facilitate more rapid access to financial information.	Access to financial information enhanced.	December 2022	All Supervisors
	11. Establish and maintain effective methods of record keeping for all statistics.	Effective record keeping system in place	May 2021	All competent authorities
Strengthen national coordination and cooperation of AML/CFT/PF matters.	v) Introduce AML/CFT policies and action plans informed by risk, which will also assist in prioritization of allocation of resources in addressing the identified ML/TF risks.	Risk based AML/CFT polices in place	December 2020	All Supervisors

	<p>vi) Authorities to come up with policies which encourage better coordination on investigations and prosecutions of ML/TF cases, particularly where corruption is involved.</p>	<p>Policies facilitating better coordination on investigations and prosecutions of ML/TF cases in place</p>	<p>June 2023</p>	<p>FIA, UPF, ODPP, IG</p>
	<p>vii) Authorities to put in place policies to facilitate cooperation and coordination of confiscation of proceeds of crime between LEAs, prosecution and the courts.</p>	<p>Policies to facilitate cooperation and coordination of confiscation of proceeds of crime between LEAs, prosecution and the courts implemented.</p>	<p>June 2023</p>	<p>FIA, UPF, ODPP, IG</p>
	<p>viii) To strengthen national and regional cooperation against wildlife trafficking and related financial flows.</p>	<p>Robust national and regional cooperation (against wildlife trafficking and related financial flows) in place.</p>	<p>May 2025</p>	<p>FIA, UWA</p>