Executive Summary

1.   This report summarises the AML/CFT measures in place in Indonesia as at the date of the on-site visit from 17 July to 4 August 2022. It analyses the level of compliance with the FATF 40 Recommendations and the level of effectiveness of Indonesia's AML/CFT system and provides recommendations on how the system could be strengthened.

Key Findings

a)   Indonesia has good understanding of its ML/TF risks, which is reflected in its public national risk assessments (NRAs) and thematic and sectoral risk assessments. National AML/CFT policies, strategies and activities seek to address the risks identified. National co-ordination and co-operation on AML/CFT issues at both the policy and operational levels is strong. Assessment of ML risks of environmental crimes (e.g., forestry and illegal logging) and organised crime networks as well as NPOs needs a deeper consideration.

b)   Indonesia proactively investigates, prosecutes and convicts a range of TF activity, in line with its identified risks in this area. Foreign terrorist fighters returning home following the collapse of the ISIS caliphate feature prominently in the CT and CFT strategy. Indonesia employs a multi-pronged approach focused on de-radicalisation and counter-radicalisation, which has elements of CFT measures.

c)   Indonesia has put in place a legislative framework for the implementation of TFS, although challenges related to implementation of TF-TFS without delay remain. The process for the domestic implementation of UN 1267/1988 listings on the AQ/ISIL Sanctions List and Taliban Sanctions List (and for designations under the UNSCR 1373) requires the DTTOT Task Force (consisting of the MoFA, PPATK, Special Detachment 88, BIN and BNPT) agreement, and subsequent approval by the Central Jakarta District Court (CJDC). NPO risks have not been wholly understood and at-risk NPOs have not been targeted for outreach or proportionate measures, on an ongoing and systematic basis.

d)   Indonesia has taken steps to address shortcomings in their legal framework for PF-TFS; however, some gaps remain. Indonesia have designated all Iranian individuals/entities listed in the UNSCR 2231 to the WMD list, and

DPRK-related individuals and entities listed on the UNSCR 1718 sanctions list. The time gap between UN listing of persons and entities, domestic designation by Indonesia, and the implementation of the freezing obligation by financial institutions was less than 24 hours over the review period.

e) LEAs have access to financial intelligence from the Indonesian FIU (PPATK) on request and through proactive disseminations, which is used extensively to support ML/TF and related predicate offences investigations and trace assets. PPATK has access to a wide range of public and private sector databases and information, uses a variety of tools and techniques to enhance the value of the information to build financial intelligence, and has a sound analytical process which includes a prioritisation framework. The low number of STRs submitted by some DNFBPs and those relating to environmental/forestry crime are some of the challenges in this area.

f) Indonesia has its strong legal and institutional framework to investigate ML which it uses to pursue ML activity, although this is primarily used as a means of asset identification and recovery rather than parallel to the predicate investigation. The number of ML investigations is relatively low considering the risk and context of Indonesia, especially in some key categories of predicate offences, as well as ML involving foreign predicates, stand-alone cases and legal persons.

g) Indonesia has a legal and organisational framework for asset recovery which is well socialised among LEAs and public prosecutors. The Asset Recovery Centre (ARC) in the AGO effectively supports, coordinates, and enhances LEAs' asset tracing and recovery efforts domestically and internationally and also manages seized assets to preserve their value until final confiscation. There is also strong national coordination to support pursuit of illicit proceeds. Indonesia is less effective in recovering assets located abroad and the statistics show that the total sums relating to transnational asset recovery confiscated are not in line with the risks in this area. Confiscation figures for forestry and environmental crime is relatively small considering the size of proceeds expected to be generated from both the predicate crimes and related ML offences. In total, less than 10% of assets identified for confiscations have been realised to the state.

h) Understanding of ML/TF risks and obligations varies across FIs and DNFBPs. This is generally high for banks, larger FIs and VASPs, but lower for DNFBPs, particularly for real estate agents. Understanding of TF in the DNFBP sector is underdeveloped and limited to screening of client information against the DTTOT list. Reporting by all DNFBP sectors, most notably in the real estate, notary and lawyer professions is not commensurate with Indonesia's risk profile.

i) The key financial supervisory authorities have a very good understanding of ML risk, while the understanding of TF risk is not at the same level as for ML. There are some good elements of risk-based supervision. Some sanctions are imposed in the financial sector and there is scope to take a more robust approach. This also applies for the DNFBP sector, where even though remedial measures ranging from warnings to license revocation exist, the majority of the sector constituents has been subject to warnings only.

j) Indonesia has assessed and developed a comprehensive understanding of the ML/TF risks of legal persons and legal arrangements through a number of SRAs, which have been widely disseminated to competent authorities and the private sector. Indonesia has a central registry of legal persons managed by the MLHR which contains basic and, where available, BO information on all types of legal persons. The relatively low number of BO registrations raises concerns on the overall effectiveness of the system. Although available in law to some extent, Indonesia is not applying sanctions for failures to comply with the requirements regarding disclosure of basic and BO information.

k) Indonesia has a strong framework for international cooperation and has entered into a number of bilateral and multilateral agreements for providing and seeking MLA and extradition. The MLHR, as the central authority, administers an integrated electronic case management system for MLA and extradition requests. A strong feature of the system is timely and proactive informal cooperation, especially on TF given the time-sensitive nature of such cases. PPATK and most LEAs play a vital role in exchanging information with foreign counterparts on outgoing/incoming requests and spontaneous disseminations.

Risks and General Situation

2. Indonesia ML risk primarily stems from domestic proceeds. In particular, higher risks are associated with predicate offences of narcotics, corruption, banking crimes and taxation. Forestry crimes also generate significant proceeds. Proceeds from these predicate crimes are primarily laundered through the banking, capital markets and real estate sectors. Proceeds are also laundered off-shore in regional jurisdictions and then repatriated to Indonesia. However, Indonesia is not a major destination jurisdiction for foreign illicit proceeds. The main foreign predicate offences involving laundering of proceeds in Indonesia are corruption, fraud and narcotics.

3. Indonesia faces high TF risk due to the presence of terrorist organisations and their supporters in the country. Indonesia's key terrorism threats are domestic organisations (e.g., Darul Islam (DI) and Jemaah Islamiyah (JI)). TF threats associated with these groups are from a range of domestic and foreign sources including direct support and donations, membership fees, self-funding, abuse of NPOs, and legitimate and criminal activities. Funds are mostly moved abusing the banking system including online banking, mobile payments and formal and informal money value transfer systems. More recently, the use of social media to call for and facilitate donations has increased. The emerging trends in TF include use of online cross-border payments and cross-border cash movement.

Overall Level of Compliance and Effectiveness

4. Indonesia's AML/CFT is effective in some areas. Particularly good results are being achieved in the areas of understanding the ML/TF risks facing the country, use of financial intelligence for investigation of ML/TF and associated predicate offences, investigation and prosecution of TF offences and co-operating domestically and internationally to facilitate action against criminals and their assets. However, major improvements are needed in a number of other areas, including supervision, effective implementation of preventive measures and targeted financial sanctions, preventing the misuse of legal persons and arrangements for ML/TF and investigation and prosecution of different types of money laundering activities as well as confiscation of criminal proceeds, particularly proceeds that have been moved offshore.

5. Indonesia has particularly strong legal, regulatory and institutional framework, resulting in a robust technical compliance in a number of areas. However, significant improvements are needed in areas such as implementation of TFS to terrorism/TF without delay, risk-based approach for NPOs and supervision of the DNFBP sector.

6. Indonesia has taken steps to strengthen its AML/CFT framework since its last APG evaluation particularly in relation to stronger risk assessment tools and processes and ensuring transparency and beneficial ownership information of legal persons. One important issue which is outstanding from the previous assessment is the need to enhance the targeted outreach and oversight activity for the NPOs identified as most vulnerable to terrorist financing abuse and the implementation of targeted financial sanctions.

Assessment of risk, coordination and policy setting (Chapter 2; IO.1, R.1, 2, 33 & 34)

7. Overall, Indonesia has a good understanding of its ML/TF risks, as reflected in NRAs and a number of thematic and sectoral risk assessments (SRAs). Indonesia carried out their first NRA for ML and TF in 2015, updated them in 2019, 2021 and 2022. A notable feature of the mechanism is Indonesia's significant efforts to identify, assess and understand internal geographical risks across different provinces. NPO risk assessment will benefit from a more robust approach and a deeper consideration of ML risks of environmental crimes (e.g., forestry and illegal logging) and organised crime networks is needed.

8. National policies/objectives have been established through national strategies, which are supported by annual action plans. Coordination and monitoring of this framework is undertaken by the National Coordination Committee and is generally strong.

9. Authorities have taken a wide range of concrete and positive steps to address ML/TF risks specific to Indonesia. The steps have been structural and operational in nature and have been taken throughout the AML/CFT system. Operational co-operation and co-ordination for both ML and TF is generally strong. While there is no written strategy in relation to PF, co-ordination is well established. Substantial efforts have been made to inform reporting entities about the existence of the NRAs and SRAs.

Financial intelligence, ML investigations, prosecutions and confiscation (Chapter 3; IO.6, 7, 8; R.1, 3, 4, 29–32)

Use of financial intelligence (Immediate Outcome 6)

10.   Financial intelligence is regularly used by competent authorities to support ML/TF and related predicate offences investigations, including the tracing of assets for confiscation. LEAs have access to financial intelligence from the Indonesian FIU (PPATK) on request as well as through proactive disseminations. LEAs also use a vast array of internal and external sources to generate financial intelligence. PPATK produces and disseminates a wide range of financial intelligence products, including strategic analysis products, which are widely used by LEAs to successfully identify and detect wider networks of criminals and their associates and for asset tracing.

11.   PPATK uses a wide variety of IT tools and techniques. However, the limited number of STRs from DNFBPs and those related to environmental crimes do not seem fully consistent with the Indonesian risk profile. Furthermore, a significant number of reporting entities are not yet registered with the goAML system, which is the most efficient way to submit reports. This may limit the financial intelligence available to the PPATK. PPATK and other competent authorities share information domestically and with international counterparts through a number of systems and platforms. PPATK has made commendable efforts in facilitating domestic coordination between competent authorities through regular coordination meetings, participation in inter agencies task forces and deployment of liaison officers.

ML Offence (Immediate Outcome 7)

12.   Indonesia has a strong legal and institutional framework to investigate ML. Investigations are mainly in relation to and consistent with the predicate crimes identified as high-risk in the 2021 NRA, namely corruption, narcotics and fraud/economic crime. However, the number of ML investigations is relatively small considering the risk and context. In particular, ML investigations for environmental crime is low, although recent developments that establish the mandate of the Ministry of Environment and Forestry to investigate ML is encouraging. In general, the LEAs designated and empowered to investigate ML seem to prioritise the investigation and prosecution of the predicate offence. ML investigations are often only initiated at a later stage of the predicate offence investigation to support asset recovery rather than parallel to the predicate investigation.

13.   Case studies presented by Indonesia reflect LEAs' ability to effectively conduct ML investigations. However, in general, the types and number of ML cases prosecuted are not fully aligned with the risk profile of Indonesia. Convictions over the last five years mostly relate to self-laundering, third-party laundering to a limited extent, and very few stand-alone ML cases or those involving foreign predicates. Sanctions imposed for convictions of natural persons are effective, proportionate and dissuasive. There has been only one conviction of a legal person during the last five years.

14.   Confiscation (Immediate Outcome 8)

15. Indonesia has a legal framework for seizure and confiscation of criminal proceeds, instrumentalities of crimes and assets of corresponding value. Indonesia seeks to prioritise asset recovery as a national strategy, primarily as a mechanism for victim and State restitution. The Asset Recovery Centre (ARC) in the AGO effectively supports, co-ordinates and enhances LEAs' asset tracing and recovery efforts domestically and internationally. The ARC also demonstrates its expertise in the management of assets to preserve their value. The planned elevation of the ARC to the level of a Directorate in the AGO should enhance the resources of the agency.

16. The Indonesian authorities have seized and confiscated a wide range of assets and has shown examples domestically and, to some extent, abroad. Overall, the value of assets seized and finally confiscated to the State appears relatively small in light of Indonesia's risk and context. Indonesia has implemented a cash declaration system at all its ports of entry with administrative fines being imposed in cases of default, though their number appears low, given the risk and context.

Terrorist and proliferation financing (Chapter 4; IO.9, 10, 11; R. 1, 4, 5–8, 30, 31 & 39.)

17. TF Offence (Immediate Outcome 9)

18. Indonesia has a strong legal and institutional framework to combat TF. Indonesia's competent authority for the investigation of terrorism and TF is Detachment 88, the specialised counter terrorism unit of the INP. A number of case studies presented by the Indonesian authorities demonstrates their ability to investigate and prosecute complex TF cases, including those related to misuse of NPOs. TF prosecution and convictions is generally consistent with Indonesia's risk profile, although the focus on TF prosecution in relation to the abuse of NPOs should be enhanced.

19. TF is identified usually in parallel to a terrorism investigation. Co-ordination mechanisms are strong and produce good outcomes. To handle counter terrorism operations, Indonesia has organised a Task Force led by the National Counter Terrorism Agency and comprising a number of other agencies including the State Intelligence Agency, National Police, BNPT, PPATK, and the Attorney General Office. PPATK leads the development of the national CFT Strategy and risk assessment. The strategy is in line with the risks and vulnerabilities identified. The BNPT is responsible for developing and coordinating the implementation of a comprehensive national strategy to combat terrorism across 48 government agencies.

20. Indonesia has a strong focus on de-radicalisation and counter-radicalisation. Consistent with the national strategy to counter terrorism, the national CT agency conducts disruptive operations to incapacitate the operational capabilities of terrorist groups in Indonesia. Indonesia is also utilising platforms shared across relevant authorities and the private sector, to obtain information domestically, including financial information on terrorists to be able to identify TF.

21. Preventing Terrorists from Raising, Moving and Using Funds (Immediate Outcome 10)

22. Indonesia has put in place a legislative framework for the implementation of TF-TFS, though the challenges of implementation without delay remains. The process for the domestic implementation of UN 1267/1988 listings on the AQ/ISIL Sanctions List and Taliban Sanctions List (and for designations under the UNSCR 1373) requires the DTTOT Task Force (consisting of the MoFA, PPATK, Special Detachment 88, BIN and BNPT) agreement, and subsequent approval by the Central Jakarta District Court (CJDC). The CJDC intervention in the process is limited to verify the procedural steps set out in the domestic framework. No instances where the CJDC has refused a listing were reported by Indonesia.

23. The updated 2022 NPO SRA identifies 32 NPOs as high risk. Indonesia reinforced its legislative and regulatory framework and has conducted some outreach to raise awareness about potential TF vulnerabilities. However, NPO risks have not been wholly understood and at-risk NPOs have not been targeted for proportionate measures, on an ongoing and systematic basis.

24. Proliferation Financing (Immediate Outcome 11)

25. Indonesia has taken steps to address the shortcomings in their legal framework for PF-TFS. Indonesia reports that they have designated all of the Iranian individuals/entities listed in the UNSCR 2231 to the WMD list, and DPRK-related individuals and entities listed on the UNSCR 1718 sanctions list since the 2017 APG assessment. However, concerns exist about the coverage as the TFS obligations do not extend to all natural and legal persons within the country.

26. According to authorities, Indonesia has financial/trade activity linked to DPRK and Iran but has had no exposure to persons or entities-designated under the relevant UNSCRs. 197 PF related STRs had been filed by FIs, none of which were found by the authorities to have ties to designated persons or proliferation related activities. Consequently, no funds or other assets of designated persons/entities had been identified or frozen. Banks and capital market entities demonstrated a sound understanding of their obligation to conduct list-based screening of designated persons and entities and of sanctions evasion risk. Smaller institutions, DNFBPs were less clear about their exposure to such risk.

27. OJK, BI and CoFTRA are monitoring PF-TFS compliance during their inspections. Monitoring of and outreach to DNFBPs to ensure effective compliance with PF obligations needs further improvements.

Preventive measures (Chapter 5; IO.4; R.9–23)

28. Generally, banks have a good understanding of ML/TF risks, while other FIs exhibited a mixed understanding of ML risk and less developed understanding of TF risk. VASPs appear to have a good understanding of the specific ML risks to which they are exposed with less developed understanding of TF risk. DNFBPs rely predominantly on the SRA findings in developing their general understanding of the risk present in their industry, although the level of understanding of risks specifically arising out of client interactions needs to be developed further. The notary profession did, however, demonstrate a heightened TF risk in their services due to their involvement in the creation of foundations (NPOs).

29. Banks and security firms demonstrated good understanding and implementation of the risk-based approach, customer/enhanced due diligence, STR filing, record-keeping and TFS measures. However, the identification of the beneficial ownership needs to be enhanced, in particular as banks seem to rely heavily on the beneficial ownership register and self-declarations in order to meet their obligations. Other FIs demonstrated an evolving level of implementation of the AML/CFT requirement. More focused guidance will help institutions better implement mitigating measures. VASPs have taken steps to implement their obligations, but they are in the early stages of implementing AML/CFT requirements (e.g., on the travel rule). In the DNFBP sector, the application of the risk-based approach needs to be developed. Compliance with TF obligations seems limited to screening against the DTTOT list.

30. Generally, STR filing by banks is strong, with NRAs, SRAs and other external/internal sources informing the development of red flags. STR reporting by other FIs also seems consistent with the risk profile. There are no STR filings by lawyers, accountants, land title registers and financial planners for the last six years. STR filings by dealers in precious metals and stones and notaries are also limited. This is not consistent with the risk and context of Indonesia.

Supervision (Chapter 6; IO.3; R.14, R.26–28, 34, 35)

31. The three main financial supervisory authorities (OJK, BI and CoFTRA) have proactively developed their AML/CFT frameworks. The measures to prevent criminals from controlling FIs through ownership are sound. In the DNFBP sector, the licensing/registration provisions of professionals (notaries, lawyers and accountants) are regulated through the professional standards and are generally sound. The general registration and trade licensing requirements allow for some general understanding of the regulated sector; however, it does not provide a barrier to entry by criminal elements within the remaining DNFBP constituents.

32. Financial supervisors have a very good understanding of ML risk. The understanding of TF is not at the same level as for ML. Financial supervisors have IT tools and capacity to assess ML/TF risk and risk rate licensees for ML/TF. Off-site and on-site supervision includes good elements of risk-based supervision, with the OJK having the most advanced framework. CoFTRA has taken commendable steps to identify and assess the risk of, and supervise, VASPs.

33. For the DNFBP sector, PPATK is the lead and other supervisory bodies have contributed to NRAs and SRAs and as such have a conceptual understanding of the broader risks. However, the understanding of individual institutional risks is less developed. PPATK uses a sound methodology for risk determination based on self-assessments and supplemented by reporting and inspection data where available.

34. While some sanctions are imposed in the financial sector, there is scope to take more robust approach. This also applies for the DNFBP sector, where even though remedial measures ranging from warnings to licence revocation exist, it is only in the accountant sector that wide-ranging sanctions have been applied, with the remaining DNFBP constituents having been subject to warnings only.

Transparency and beneficial ownership (Chapter 7; IO.5; R.24, 25)

35. Information on the creation, nature and obligations of the different types of legal persons is widely available in Indonesia. Indonesia does not recognise express trusts although waqfs, largely used for religious and humanitarian purposes, can be categorised as legal arrangements for the purpose of this assessment. Indonesia has assessed and developed a comprehensive understanding of the ML/TF risks of legal persons and legal arrangements through a number of risk assessments, which have been widely disseminated to competent authorities and the private sector.

36. Indonesia has recently transitioned from a system of multiple registries for different types of legal persons to a central registry. The registry contains basic information on all types of legal persons, with notaries involved in the formation of most legal persons (with the exception of Single Partner Limited Liability Company- SPLLC). Beneficial ownership is required to be submitted within seven days of obtaining the operational licence and any changes to beneficial ownership must be reported within three days. The relatively low number of BO registrations (approximately 28.5% of the entire universe of legal persons is populated in the registry) raises some concerns on the overall effectiveness of the system.

37. Indonesia uses a combination of mechanisms to ensure beneficial ownership information is available to the competent authorities. Law enforcement and other competent authorities have direct access to basic and beneficial ownership information held in the central registry and can also request information held by FIs and DNFBPs. Indonesia does not allow bearer shares/warrants or nominee shareholders/directors, though the use of "strawmen" has been observed in a number of ML/TF cases. Sanctions for failures to comply with the requirements were not effective or dissuasive.

38. Indonesia is not applying available sanctions options for failures to declare basic and BO information. MLHR as the supervisory authority of notaries, has not imposed any sanctions relating to their role in the process of incorporation and registration of legal persons

International cooperation (Chapter 8; IO.2; R.36–40)

39. Indonesia has a strong framework and has entered into a number of bilateral and multilateral agreements for providing and seeking MLA and extradition. The MLHR, as the central authority, administers an integrated electronic case management system for MLA and extradition requests. Generally, Indonesia has received positive feedback from counterparts on the exchange of information, although delays were reported in some instances.

40. A strong feature of the system is proactive informal cooperation, especially on TF given the time-sensitive nature of such cases. PPATK and most LEAs play a vital role in exchanging information with foreign counterparts on outgoing/incoming requests and spontaneous disseminations.

Priority Actions

a) Indonesia should increase targeted outreach to high risk NPOs. Outreach should be conducted immediately upon assessing they are high risk and on a reoccurring basis to ensure appropriate supervision and risk mitigation. The process to identify high-risk NPOs needs to be refined.

b) Indonesia should develop high level operational policy across competent authorities on initiating parallel ML investigations when investigating relevant predicate offences so as to better identify and pursue ML, in particular stand- alone ML. In view of the substantial amounts of proceeds of crime generated, more ML investigations and prosecutions for forestry and environmental crimes should be pursued in coordination with other competent authorities, especially when such crimes also relate to corruption.

c) Indonesia should fully conduct risk-based AML/CFT supervision and monitoring. Specifically, the supervision programme, including on-site, off-site inspections, monitoring and follow-up measures, should be implemented according to the identified ML/TF specific risk level of individual supervised entities. Supervisory authorities should make full use of their sanctioning powers and respond to regulatory violations with proportionate and dissuasive sanctions, in addition to written warnings.

d) Indonesia should establish stronger mechanisms to collect accurate BO information from all legal persons active in Indonesia and to impose effective, proportionate and dissuasive sanctions for non-compliance with BO registration and reporting requirements.

e) Indonesia should continue to enhance the capacity and capability of the ARC and LEAs to confiscate criminal assets in line with risk and context, as well as put in place policies and resources to enhance their ability to realise assets subject to a court ordered confiscation. In particular, Indonesian authorities should continue to develop and update their expertise in pursuing illicit assets disguised through the use of complex corporate vehicles or third-party facilitators.

f) Indonesia should continue to implement targeted financial sanctions pursuant to UNSCR1267 and UNSCR1373 without delay and continue to support reporting entities' ability to identify sanctions evasion activity beyond list-based screening practices, including through the regular dissemination of typologies reports and network analysis training.

g) Indonesia should continue to monitor the implementation of risk-based mitigating measures by financial institutions and DNFBPs, in particular, on beneficial ownership obligations, PEPs, targeted financial sanctions and sanctions evasion. Indonesia should make further efforts to develop TF risk understanding of all sectors, including financial institutions, DNFBPs and VASPs.

h) LEAs should make active use of formal international cooperation in a systematic manner to recover proceeds of crime committed within Indonesia being laundered in other countries and to effectively investigate and prosecute ML activities having cross-border aspects.

Effectiveness & Technical Compliance Ratings

Table 1. Effectiveness Ratings

IO.1 - Risk, policy and co-ordination	IO.2 International co-operation	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	Moderate	Substantial	Moderate	Moderate	

Note: Effectiveness ratings can be either a High- HE, Substantial- SE, Moderate- ME, or Low – LE, level of effectiveness.

Table 2. Technical Compliance Ratings

R.1 - assessing risk & applying risk-based approach	R.2 - national co-operation and co-ordination	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	C	LC	LC	PC
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
PC	PC	LC	LC	LC	LC
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
LC	C	LC	LC	LC	C
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
LC	C	LC	LC	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	C	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	LC	LC	LC
R.37 – Mutual legal assistance	R.38 – Mutual legal assistance: freezing and confiscation	R.39 – Extradition	R.40 – Other forms of international co-operation		
LC	LC	LC	LC		

Note: Technical compliance ratings can be either a C – compliant, LC – largely compliant, PC – partially compliant or NC – non compliant.