FIRST VICE-
PRESIDENCY OF THE
GOVERNMENT
MINISTRY
OF ECONOMY, TRADE AND
BUSINESS

GENERAL SECRETARIAT FOR THE
TREASURY AND INTERNATIONAL
FINANCE
DEPUTY DIRECTORATE-
GENERAL FOR INSPECTION
AND CONTROL OF CAPITAL
MOVEMENTS

COMMUNICATION ON NON-COOPERATIVE JURISDICTIONS IN THE FIGHT AGAINST MONEY LAUNDERING AND TERRORIST FINANCING INCLUDED ON THE FATF AND EUROPEAN COMMISSION LISTS (June 2026)

Through this quarterly communication, the Secretariat of the COPBLAC wishes to report on:

a) Developments in those jurisdictions which**, according to the FATF statement** of June 2026, are not implementing the necessary measures to protect the integrity of their financial systems within the international framework for combating Money Laundering and Terrorist Financing (ML/TF).

b) The latest restrictive measures **imposed by the European Union** on financial and commercial transactions with certain countries.

In April 2020, the FATF decided to extend the review process for the list of 'High-Risk Jurisdictions' (known as the 'blacklist'); consequently, the content of the official statement accompanying that list in relation to Iran and the Democratic People's Republic of Korea remains **unchanged from February 2020**. However, the statement does not necessarily reflect the most recent state of play regarding Money Laundering and Terrorist Financing systems in Iran and the Democratic People's Republic of Korea.

Jurisdictions subject to a FATF call on its members and other jurisdictions to apply countermeasures

Situation in the Democratic People's Republic of Korea (DPRK or North Korea).

(I) The FATF reiterates the existence of significant deficiencies in its Money Laundering and Terrorist Financing regimes and the serious threats these pose to the international financial system. Furthermore, it expresses its serious concerns regarding the threat posed by illicit activities related to the proliferation of weapons of mass destruction and their financing. The FATF reaffirms its warning and once again urges all jurisdictions to advise their financial institutions to pay particular attention to business relationships and transactions with companies and financial institutions in this country and with those acting on their behalf. Furthermore, all jurisdictions are urged to implement effective countermeasures and targeted financial sanctions in accordance with United Nations Security Council Resolutions (UNSCR) to protect their financial sectors.

PASEO DEL PRADO, 6
28014 MADRID

Jurisdictions must take the necessary measures to close existing branches, subsidiaries and representative offices of North Korean banks within their territories and to terminate the relevant relationships with banks in that country, where required by the relevant UNSC resolutions.

With regard to measures to prevent potential schemes designed to circumvent the asset-freezing measures set out in the **Security Council Resolutions**, or other trade or services prohibitions established by Resolution 1718 (2006) and subsequent Security Council Resolutions (1874 (2009), 2087 (2013), 2094 (2013), 2270
(2016), 2321 (2016) and 2371 (2017), which extended the restrictive measures, the FATF has drawn up a specific Guidance document containing indicators and criteria to help entities identify and prevent such operations, which can be accessed via the following link.

(II) At EU level, financial sanctions against North Korea are set out in Council Regulation (EU) 2017/1509 of 30 August 2017, concerning restrictive measures against the Democratic People's Republic of Korea and repealing Council Regulation (EC) No 329/2007, which has been most recently updated by Council Implementing Regulation (EU) 2023/2576 of 13 November 2023

The latest consolidated version of Regulation (EU) 2017/1509 can be found via the following link.

The following link provides further information on both these measures and the procedure for authorising financial transactions.

Situation in Iran.

(I) The FATF notes that, although the country had committed in 2016 to addressing its strategic deficiencies, by February 2020 Iran had not complied with the requirements of the Action Plan, which expired in January 2018. Specifically, as it had not formally ratified the Palermo Convention and the United Nations Convention on Terrorist Financing, in line with international standards, it has been agreed to lift the suspension of counter-measures in full and to urge all jurisdictions to apply effective counter-measures in accordance with the provisions of FATF Recommendation 19.

In January 2026, Iran provided the FATF with updated information on its ratification of the Palermo Convention, as well as the International Convention for the Suppression of Terrorist Financing. Whilst the FATF takes note of the update and Iran's commitment, at this stage, the FATF

PASEO DEL PRADO, 6
28014 MADRID

considers that the reservations Iran has entered regarding the Palermo Convention are excessively broad and that Iran's domestic compliance with the Palermo Convention does not meet FATF standards. Furthermore, Iran has failed to address the majority of its action plan since 2016.

Taking into account the United Nations Security Council (UNSC) resolutions relating to Iran's failure to comply with its nuclear non-proliferation obligations, the FATF reminds all jurisdictions of their obligations to address the Proliferation Financing risks emanating from Iran.

Furthermore, given the persistence of these threats of Terrorist Financing and Proliferation Financing, and given that Iran's action plan remains incomplete, the FATF reiterates its call to its members and urges all jurisdictions to implement effective measures against Iran, including the following:

- To refuse to allow the establishment of subsidiaries, branches or representative offices of financial institutions from the country in question, or to take into account the fact that the financial institution in question is from a country that lacks adequate systems to combat Money Laundering and Terrorist Financing.

- Prohibit financial institutions from establishing branches or representative offices in the country in question, or take into account the fact that the branch or representative office in question would be located in a country that lacks adequate systems to combat Money Laundering and Terrorist Financing.

- On a risk-based basis, restrict business relationships or financial transactions, including virtual asset transactions, with the identified country or persons from that country.

- Prohibit financial institutions and virtual asset service providers from establishing new correspondent relationships and require them to carry out a risk-based review of existing correspondent relationships with financial institutions and virtual asset service providers in the country in question.

When applying countermeasures, countries must ensure that fund flows relating to humanitarian assistance, food and medical supplies, diplomatic operating expenses and personal remittances are managed appropriately on a risk-based basis, taking into account the risks of Terrorist Financing or Proliferation Financing emanating from Iran, in accordance with international obligations.

PASEO DEL PRADO, 6
28014 MADRID

Iran will remain on the list of 'Jurisdictions identified as high-risk' until the entire Action Plan has been completed; however, should the country ratify the aforementioned international conventions, in line with FATF standards, the FATF would decide on the next steps to be taken, which could include a further suspension of countermeasures. Until Iran implements the necessary measures to address the deficiencies identified in its Action Plan regarding the fight against Terrorist Financing, the FATF will maintain its warning to the international community regarding the existing risks of Terrorist Financing and the threats these pose to the international financial system.

The FATF strongly urges Iran to cooperate with it to make urgent progress on its action plan in order to fully address:

1) The proper criminalisation of the offence of Terrorist Financing, by removing, amongst other things, the exemption for designated groups that *'seek to end foreign occupation, colonialism and racism*'.

2) The identification and freezing of terrorist assets, in accordance with the relevant United Nations Security Council resolutions.

3) Ensuring an adequate and enforceable customer due diligence regime.

4) Demonstrating how the authorities identify and sanction unlicensed money/securities transfer service providers.

5) Ratify and implement the United Nations Convention for the Suppression of Terrorist Financing in accordance with FATF standards, and ensure that the ratification and implementation of the Palermo Convention also comply with FATF standards, as well as clarify the capacity to provide mutual legal assistance.

6) Ensure that financial institutions verify that electronic transfers contain complete information on the payer and the payee.

(II) At EU level. With regard to international financial sanctions against Iran, Council Regulation (EU) 2015/1861 and Implementing Regulation (EU) 2015/1862 of 18 October 2015, stipulated that certain economic and financial restrictive measures imposed by the EU ceased to apply from 16 January 2016, the date on which the Official Journal of the EU published Decision (CFSP) 2016/37, in which the Council confirms that Iran has taken the specified nuclear-related measures identified by the UN Security Council.

These EU regulations led to the removal of the requirement to apply for authorisation and to notify electronic transfers with Iran, although the obligation to

PASEO DEL PRADO, 6
28014 MADRID

freeze the funds and economic resources of persons and entities that remain on the list in accordance with Security Council Resolution 2231, although a significant number of entities to which freezing measures no longer apply have been removed from the list.

However, it should be noted that prior authorisation is required for the provision, directly or indirectly, of financing or financial assistance in certain circumstances. The following links provide further information on the financial sanctions regime against Iran and the authorisation procedure.

The most recent amendment to Council Regulation (EU) No 267/2012 of 23 March 2012 concerning restrictive measures against Iran in the commercial and financial fields was made by Council Implementing Regulation (EU) 2023/2196 of 16 October 2023.

A jurisdiction subject to a FATF call on its members and other jurisdictions to apply enhanced due diligence measures proportionate to the risks arising from the jurisdiction

Situation in Myanmar.

(I) The FATF notes that, although the country committed to addressing its strategic deficiencies in February 2020, Myanmar's action plan expired in September 2021. Given the continued lack of progress, with the majority of its action points remaining unaddressed one year after the action plan's deadline, the FATF decided in October 2022 that further action was necessary in line with its procedures, calling on its members and other jurisdictions to apply enhanced due diligence measures proportionate to the risk arising from Myanmar, with this statement remaining in force for the current cycle. Furthermore, the FATF urges that, when applying the enhanced due diligence measures, countries ensure that the flow of funds intended for humanitarian aid, the legitimate activities of non-profit organisations and remittances is not disrupted. However, it is noted on this occasion that, if no further progress has been made, the possibility of applying countermeasures will be considered in October 2026.

The statement notes that, given the limited progress over the past five years, Myanmar must urgently work to implement its FATF action plan and address its key shortcomings, including, amongst other things: (1) demonstrating better use of financial intelligence in investigations by law enforcement authorities (LEAs), and increasing operational analysis and dissemination by the financial intelligence unit (FIU); (2) ensuring that money laundering is investigated and prosecuted on a risk-based basis; (3) demonstrating the investigation of transnational money laundering cases through international co-operation; (4) demonstrating an increase in the freezing, seizure and confiscation of the proceeds of crime, instruments

PASEO DEL PRADO, 6
28014 MADRID

and/or property of equivalent value; and (5) managing seized assets to preserve their value until they are confiscated.

It is also noted that, when applying enhanced due diligence measures, countries must ensure that the flow of funds intended for humanitarian aid, the legitimate activities of non-profit organisations and remittances is not disrupted. Particularly in relation to relief efforts following the earthquake in Myanmar, the FATF recognises the importance of ensuring that the implementation of its Recommendations does not adversely and disproportionately affect non-profit organisations and, furthermore, does not unduly hinder civil society and the provision of humanitarian assistance. The FATF will also continue to monitor whether Myanmar's AML/CFT activities subject legitimate financial flows to undue scrutiny.

The FATF urges Myanmar to work towards fully addressing its AML/CFT deficiencies, and Myanmar will remain on the list of countries subject to a call for action until its action plan is completed.

Status of other jurisdictions (FATF 'grey list').

In the June 2026 communiqué, the FATF's list of "Jurisdictions under enhanced monitoring" (known as the "grey list") includes those jurisdictions with strategic deficiencies that are subject to an Action Plan and in respect of which the FATF recommends that the deficiencies and risks identified be taken into account:

Angola, Bolivia, Bulgaria, Cameroon, Côte d'Ivoire, Haiti, the British Virgin Islands, Kenya, Kuwait, Lebanon, Monaco, Nepal, Papua New Guinea, the Democratic Republic of the Congo, the Lao People's Democratic Republic, Syria, South Sudan, Venezuela, Vietnam and Yemen.

The FATF has also identified Bosnia and Herzegovina and Iraq as countries included on this list.

Algeria and Namibia have been removed from this list.

Attached is a link to the websites of the FATF and the General Secretariat for the Treasury and International Finance, which contain useful information for assessing potential risks associated with transactions involving the aforementioned countries and jurisdictions.

PASEO DEL PRADO, 6
28014 MADRID

PASEO DEL PRADO, 6
28014 MADRID

LIST OF HIGH-RISK COUNTRIES AS DEFINED BY THE EUROPEAN UNION

(IN ACCORDANCE WITH ARTICLE 9 OF DIRECTIVE (EU) 2015/849)

With regard to lists of high-risk countries in relation to ML and TF, the European Union adopts a specific approach, albeit one based on the FATF's criteria in this area. This mechanism was designed following the adoption of Directive 849/2015 of the European Parliament and of the Council of 29 May 2015, on the prevention of the use of the financial system for the purposes of Money Laundering and Terrorist Financing, which, in Articles 9 and 18, provides for the application of enhanced due diligence measures to those jurisdictions with strategic deficiencies in their AML/CFT systems.

These countries with strategic deficiencies have been identified by Commission Delegated Regulation 2016/1675 of 14 July 2016, identifying high-risk third countries with strategic deficiencies, and its subsequent amendments.

On 16 July 2025, the European Commission published Commission Delegated Regulation (EU) 2025/1184 of 10 June 2025, amending Regulation (EU) 2016/1675.

Consequently, the EU list of high-risk third countries now contains separate entries for **North Korea and Iran,** reflecting the differentiated treatment that the FATF itself applies to these countries; furthermore, it also lists the following countries as having strategic deficiencies: **South Africa, Afghanistan, Angola, Algeria, Burkina Faso, Cameroon, Côte d'Ivoire, Haiti, Kenya, Lebanon, Mali, Monaco, Mozambique, Myanmar, Namibia, Nepal, Nigeria, the Democratic Republic of the Congo, the Lao People's Democratic Republic, Syria, South Sudan, Tanzania, Trinidad and Tobago, Vanuatu, Venezuela, Vietnam and Yemen.**

The Delegated Regulation can be found at the following link.

Consequently, it should be noted that, in accordance with Article 11 of Law 10/2010 of 28 April on Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT), and Article 20 of the Regulation, approved by Royal Decree 304/2014 of 5 May and amended by Royal Decree-Law 7/2021 of 27 April, obliged entities **shall apply enhanced due diligence measures** in respect of the countries listed in the updated version of the aforementioned Commission Delegated Regulation (EU) 2016/1675 of 14 July 2016, in accordance with the provisions of Article 9 of Directive (EU) 2015/849 of the European Parliament and of the Council of 20 May 2015.

PASEO DEL PRADO, 6
28014 MADRID

Should you require any further clarification, please contact the Secretariat of the Prevention Committee (secretariaicmc@economia.gob.es).

SANCTIONS AGAINST RUSSIA IMPOSED BY EUROPEAN UNION REGULATIONS

Following the invasion of Ukraine, the European Union has adopted, through the relevant provisions, a series of international sanctions to supplement those already in force since 2014. These measures have the force of EU Regulations and, as such, have been adopted by the Council of the European Union and are binding throughout the European Union.

In order to provide information to those required to comply with these measures regarding procedures, obligations and authorisations, the Secretariat of the Commission for Money Laundering has set up the following website.

In addition, there has set up an email email email for enquiries sancionesfinancieras@economia.gob.es .

PASEO DEL PRADO, 6
28014 MADRID