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European Commission Updates List of High-Risk Countries

Of particular interest to: firms subject to the EU Money Laundering regime and to UK firms with business in the EU

In Brief

On 10 June 2025, the European Commission adopted a Delegated Regulation amending Delegated regulation (EU) 2016/1675, which contains the official list of high-risk third countries under the EU Anti-Money Laundering Directive (AMLD). The amendment updates the EU's so-called "blacklist" of jurisdictions presenting strategic deficiencies in their anti-money laundering and countering the financing of terrorism (AML/CFT) frameworks. This list is crucial for entities subject to the AMLD, as it triggers the obligation to apply enhanced due diligence when dealing with these countries.

Summary

The updated high-risk third-country list reflects the latest evaluations conducted in close coordination with the Financial Action Task Force (FATF) and based on thorough technical assessments, including bilateral dialogues and on-site visits. While the EU list is heavily influenced by the FATF's work—particularly its "Jurisdictions under Increased Monitoring"—the EU independently decides which jurisdictions to include or exclude.

In this latest amendment, ten countries have been added to the list due to ongoing strategic AML/CFT deficiencies: Algeria, Angola, Côte d'Ivoire, Kenya, Laos, Lebanon, Monaco, Namibia, Nepal, and Venezuela. Conversely, eight countries have been removed following improvements and commitments to implement FATF action plans: Barbados, Gibraltar, Jamaica, Panama, the Philippines, Senegal, Uganda, and the United Arab Emirates.

Notably, Monaco has been added, reflecting recent evaluations, whereas Gibraltar has been delisted. The delegated regulation will enter into force 20 days after its publication in the Official Journal, subject to scrutiny and non-objection by the European Parliament and the Council.

No.	High Risk Third Country
1	Afghanistan
2	Algeria
3	Angola
4	Burkina Faso
5	Cameroon
6	Côte d'Ivoire
7	Democratic Republic of the Congo
8	Haiti
9	Kenya
10	Laos
11	Lebanon
12	Mali
13	Monaco

14	Mozambique
15	Myanmar
16	Namibia
17	Nepal
18	Nigeria
19	South Africa
20	South Sudan
21	Syria
22	Tanzania
23	Trinidad and Tobago
24	Vanuatu
25	Venezuela
26	Vietnam
27	Yemen

Actions to be taken by Firms

Entities within the European Union subject to the EU Anti-Money Laundering Directive must apply enhanced due diligence measures when establishing or maintaining business relationships, or conducting transactions, involving entities from the listed high-risk third countries. This includes increased scrutiny, ongoing monitoring, and taking appropriate risk mitigation steps to prevent money laundering and terrorist financing risks.

These requirements ensure that firms adequately address the elevated risks associated with these jurisdictions, safeguarding the integrity of the EU's financial system and complying with their legal obligations under the AMLD.

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