

Republic of Belarus: Second Follow-up Report under regular monitoring (without re-rating)



**NOVEMBER,
2025**

REPUBLIC OF BELARUS: 2ND FOLLOW-UP REPORT AS PART OF THE REGULAR FOLLOW-UP PROCESS

I. Introduction

1. The Mutual Evaluation Report (MER) of the Republic of Belarus was approved in November 2019. Based on the results of the mutual evaluation, the Republic of Belarus was placed in the regular follow-up process. As part of the regular follow-up, the first Follow-up Report was approved in November 2022.
2. This Follow-up Report presents an analysis of the results achieved by the Republic of Belarus in addressing the technical compliance deficiencies identified in the MER. This report also provides an analysis of changes to the national AML/CFT system related to the updated FATF Recommendations that were approved after the approval of the previous follow-up report.
3. This is the final report for the Republic of Belarus in the second round of the EAG mutual evaluations in accordance with the [Sequence of mutual evaluations of EAG Member States in the 3rd round](#).
4. The 2nd Follow-up Report is provided for information purposes only; the Republic of Belarus does not request a re-rating of its technical compliance ratings with any FATF Recommendations.

II. Conclusions of the Mutual Evaluation Report

5. According to the MER results, the Republic of Belarus received the following effectiveness and technical compliance ratings under the FATF Recommendations:

Table 1. Effectiveness Ratings¹:

IO1	IO2	IO3	IO4	IO5	IO6	IO7	IO8	IO9	IO10	IO11
SE	SE	ME	ME	LE	SE	ME	ME	SE	ME	SE

Table 2. Technical Compliance Ratings²:

R. 1	R. 2	R. 3	R. 4	R. 5	R. 6	R. 7	R. 8	R. 9	R. 10
LC	LC	C	C	C	LC	LC	PC	C	LC
R. 11	R. 12	R. 13	R. 14	R. 15	R. 16	R. 17	R. 18	R. 19	R. 20
LC	LC	LC	C	PC	LC	LC	LC	LC	C
R. 21	R. 22	R. 23	R. 24	R. 25	R. 26	R. 27	R. 28	R. 29	R. 30
C	LC	LC	LC	LC	LC	LC	PC	C	C
R. 31	R. 32	R. 33	R. 34	R. 35	R. 36	R. 37	R. 38	R. 39	R. 40
C	LC	LC	C	LC	C	LC	LC	LC	LC

6. Based on the results of the mutual evaluation, the Republic of Belarus was placed in the regular follow-up process by the EAG.

III. Analysis of changes aimed at improving the level of technical compliance

7. This section contains information on measures taken by the Republic of Belarus aimed at:
 - a) addressing technical compliance deficiencies identified in the MER;
 - b) aligning legislation with the new requirements of the FATF Recommendations that entered into force after the on-site mission to the Republic of Belarus.

¹ SE - substantial effectiveness, ME - moderate effectiveness, LE - low effectiveness.

² C - compliant, LC - largely compliant, PC - partially compliant, NC - non-compliant, NA - not applicable.

3.1. Changes aimed at addressing technical compliance deficiencies identified in the MER

8. During the period under review, the Republic of Belarus adopted a number of regulatory legal acts governing AML/CFT/CPF issues (see Annex 1).

Recommendation 1 (rated LC in the MER)

9. The Law of the Republic of Belarus No. 30-Z dated July 9, 2024 ratified the Agreement on the establishment of the International AML/CFT Risk Assessment Center, which was signed in Bishkek on October 13, 2023. The agreement is intended to ensure effective interstate information sharing and the conduct of a supranational assessment of the risks of legalization (laundering) of proceeds from crime and the financing of terrorism.

Recommendation 3 (rated C in the MER)

10. The Law of the Republic of Belarus No. 61-Z "On Amendments to Criminal Liability Codes" was adopted on February 17, 2025. This Law amends Article 235 (money laundering) of the Criminal Code of the Republic of Belarus. To ensure proportionality of sanctions for ML offences, Part 1 of Article 235 of the Criminal Code has been supplemented with a penalty in the form of restriction of freedom for up to 5 years, and Part 2 of Article 235 of the Criminal Code (the same acts committed repeatedly, or by an official using their official powers, or on an especially large scale) with a penalty in the form of restriction of freedom for a term of 3 to 5 years. The sanctions outlined in parts 1 and 2 of this article are supplemented by an alternative type of punishment known as restriction of freedom.
11. The Law No. 61-3 supplements the sanctions for a number of predicate offences (for example, Part 3 of Article 233 of the Criminal Code – activities carried out without a license or special permit by an organized group, Parts 1 and 2 of Article 328 of the Criminal Code – illicit drug trafficking, Part 1 of Article 430 of the Criminal Code – bribery, and others) with alternative types of punishment to imprisonment, and also adjusts the sanctions for predicate offences.

Recommendation 5 (rated C in the MER)

12. The Law No. 61-Z of the Republic of Belarus "On Amendments to Criminal Liability Codes" dated February 17, 2025, was adopted. This Law amends Article 290¹ (financing of terrorist activity) of the Criminal Code of the Republic of Belarus. According to these amendments, persons who have previously committed offences under Part 2 of the above-mentioned article will be held liable, including those provided for in Part 3 of Article 322 (illegal acquisition, storage, use, sale or destruction of radioactive materials), Part 3 of Article 323 (theft of radioactive materials), Article 324 (threat of dangerous use of radioactive materials), Part 3 of Article 333 (illegal trafficking in potent or toxic substances), Articles 361⁴ (assistance to extremist activity), 361⁵ (undergoing training or other preparation for participation in extremist activity)

Recommendation 15 (rated PC in the MER)

13. The MER identified the following deficiency: "the need to identify and assess the ML/TF risks that may arise in connection with the development of new products and new business practices, including new transfer mechanisms, and the use of new or developing technologies, for both new and existing products, has not been established."
14. Information on the elimination of this deficiency is presented in the [1st Follow-up Report of the Republic of Belarus for 2020-2022](#). (items 31-32).
15. Additional amendments have been made to Instruction 818 (item 33), according to which banks are required to assess the ML/TF risks of the methods of providing banking services (selling products) to customers before introducing new services (products), changing the material conditions or methods of their provision, introducing new technologies for conducting financial transactions, and also to update such assessments.

16. Item 23 of Instruction 501 provides for the obligation of electronic money issuers to identify and assess the risk of the payment service before introducing the new payment service, changing the material conditions or methods of providing the payment service, or introducing new technologies for conducting financial transactions.
17. Regulation on the requirements for the internal control rules of the High-Tech Park residents (hereinafter referred to as the Regulation on the HTP) as amended on January 31, 2025:
 - paragraph 11 of part 1 of item 9 of the Regulation on the HTP – AML/CFT officers of crypto-residents of the High-Tech Park (VASPs) are assigned the function of making decisions on classifying services as high-risk;

Recommendation 16 (rated LC in the MER)

18. The MER identified one of the deficiencies: "the legislation of the Republic of Belarus does not contain any requirements regarding the period within which the sending financial institution must provide information about the money transfer upon request of the receiving financial institution."
19. Item 2 of Resolution 3 establishes that OAO "NKFO "ERIP", within a period not exceeding two banking days from the date of the request of the receiving bank, ensures the interaction of participants in the payment system in the ERIP (United Payment and Information Space) in transferring identification data about the payer in the volume established by part twenty or part twenty-one of Article 8 of Law No. 165-Z, for the receiving bank to make a decision on recognizing the financial transaction as subject to special control.

Recommendation 17 (rated LC in the MER)

20. The MER identified the following deficiency: "Law 165-Z stipulates that information obtained during identification is transferred in the manner and within the timeframes specified in the agreement between the guarantor and the contractor. However, there is no clear indication of the time frame within which this information must be provided."
21. Regulation on requirements for internal control rules in VASPs as amended on January 31, 2025:
 - Part four of item 36 of the Regulation – the criterion for immediate (prompt) receipt of information about customers in the event of identification by a third party (identification agent) has been implemented.

Recommendation 22 (rated LC in the MER)

22. Decree of the President of the Republic of Belarus No. 226 dated 06.06.2025 "On gambling business activities" was issued, according to which:
 - 3) in accordance with items 19 and 20 of the Regulation on the implementation of the gambling business activities, approved by Decree of the President of the Republic of Belarus No. 226 dated 06.06.2025, visitors to gambling establishments and virtual gambling establishments are prohibited from:
 - presenting identification documents that do not belong to them when visiting a gambling establishment, registering as a participant in a gambling game, and then accessing a virtual gambling establishment, receiving winnings, or returning unsuccessful bets;
 - using bank payment cards or electronic wallets that do not belong to them when placing bets, receiving winnings, or returning unsuccessful bets;
 - placing bets with funds transferred to other persons from accounts opened in banks, non-bank financial institutions, and foreign banks;

- indicating in the applications for payment of winnings and return of unsuccessful bets, accounts opened for other persons in banks, non-bank financial institutions, and foreign banks; participating in gambling based on third-party instructions;
 - having more than one gambling account;
- 4) gambling operators are authorized to check the validity of an identity document, as well as the player's ownership of a payment instrument (electronic wallets, bank payment cards, accounts) in the manner determined by the internal control rules (items 19, 20, 26 of the Regulation on the implementation of the gambling business activities, approved by Decree of the President of the Republic of Belarus No. 226 dated 06.06.2025);
 - 5) mechanisms for identification, verification, and authentication of online gambling participants are being improved. In particular, provision is made for a video session with the player via the Internet, or a visit by the player to a gambling establishment, multi-factor authentication, and obtaining a photograph of the player at the time of his participation in an online gambling game (subitems 29.10 - 29.12 of item 29 of the Regulation on the implementation of the gambling business activities, approved by Decree of the President of the Republic of Belarus No. 226 dated 06.06.2025).

Recommendation 27 (rated LC in the MER)

23. The MER identified the following deficiency: "the legislation does not provide for direct obligations to revoke, restrict or suspend a license for violation of AML/CFT/CPF measures (with the exception of banking legislation)."
24. According to Decree of the President of the Republic of Belarus No. 416 dated November 11, 2024 "On factoring activity", if a factoring organization fails to comply with an order and (or) requirement, the National Bank has the right to exclude the factoring organization from the register.
25. In accordance with Article 274 of the Law on Licensing No. 213-Z dated 14.10.2022 (came into force on 01.01.2023), a licensing requirement is compliance with measures to prevent the legalization of proceeds from crime, the financing of terrorist activities and the financing of the proliferation of weapons of mass destruction.
26. According to Article 277 of the Law on Licensing, a gross violation of licensing legislation is failure to implement measures to prevent the laundering of proceeds from crime, the financing of terrorist activities and the financing of the proliferation of weapons of mass destruction. According to Article 35 of the Law on Licensing, if such a violation is discovered, the supervisory authority issues an order and reserves the right to suspend the license until the violation is resolved. In the event of a repeat violation, the licensing authority has the right to terminate the license.

Recommendation 28 (rated LC in the MER)

27. The MER identified several deficiencies, including:
 - no licensing requirements for beneficial owners and those with a controlling interest;
 - the established forms of supervision do not fully comply with the RBA model recommended by Criterion 28.5.
28. On 01.01.2023, the provisions of the RB Law on Licensing No. 213-Z dated 14.10.2022 came into force, which stipulates that pre-licensing (licensing) requirements (a legal person, its director and deputy directors, or a natural person who is a founder (participant) of a legal person have not been brought to administrative liability for committing violations of AML/CFT legislation in the last two years; legal person's director and deputy directors, or a natural person who is a founder (participant) of a legal person do not have an unremoved or unexpunged criminal record for committing crimes

against the procedure for carrying out economic activities) is extended to all applicants for a license to carry out gambling business activities and licensees (subitems 1.2 and 1.3 of item 1 of Article 105, the second paragraph of item 1 of Article 106 of the Law on Licensing).

29. The order of the Ministry of Taxes and Duties of the Republic of Belarus No. 120 dated 29.11.2022 "On Amending the Order of the Ministry of Taxes and Duties of the Republic of Belarus No. 20 dated February 9, 2018" was issued, which supplemented the list of criteria for assessing the level of risk for gambling operators with two new criteria: "The entity determined its director to be the beneficial owner", "The entity failed to provide information about its beneficial owners".

Recommendation 31 (rated C in the MER)

30. The Law of the Republic of Belarus No. 61-Z dated 17.02.2025 amended the Criminal Procedure Code of the Republic of Belarus, including Article 199 of the Criminal Procedure Code.
31. This law authorizes law enforcement agencies to conduct investigations into the facts of financing and other material support for terrorism and extremism (Articles 290-1, 292, 293, 342, 361-2, 361-3 and 369-2 of the Criminal Code of the Republic of Belarus). This will enable them to independently conduct pre-investigation checks on the facts in question and make procedural decisions on them when carrying out their assigned tasks, which will increase the effectiveness of the fight against the financing of terrorism and extremism.

Recommendation 32 (rated LC in the MER)

32. This rating relates to the non-declaration of cash and/or bearer negotiable instruments during their cross-border movement within the EAEU. To ensure compliance with the FATF Standards regarding the implementation of Recommendation 32, customs authorities supported the EAG initiative to recognize the EAEU as a supranational jurisdiction. The State Customs Committee sent a corresponding letter to the EEC in November 2024 (outgoing No. 01-1-2/36218 dated November 1, 2024). The EEC has not yet responded regarding the possibility of implementing this proposal.
33. Adoption of this initiative will enable the transfer of cash and/or bearer negotiable instruments across the EAEU's external border to be considered cross-border, allowing the country to be rated "Compliant" under the above-mentioned criteria.

Recommendation 37 (rated in LC the MER)

34. The Law of the Republic of Belarus No. 9-Z dated May 24, 2024 ratified the Agreement on Cooperation in the Field of Security and Counter-Terrorism between the Government of the Republic of Belarus and the Government of the United Arab Emirates. The Financial Investigations Department of the State Control Committee has been designated as one of the competent authorities.

2.2. Changes to comply with updated Recommendations since the 1st follow-up report was approved

35. Since the approval of the previous follow-up report of the Republic of Belarus, Recommendations 4, 8, and 24 have been amended. This section provides an analysis of the national AML/CFT system's compliance with the updated Recommendations.

Recommendation 4 (rated C in the MER)

36. Resolution No. 1 of the Plenum of the Supreme Court of the Republic of Belarus dated June 29, 2023 "On the application of special confiscation by courts (Article 461 of the Criminal Code of the Republic of Belarus)" was adopted. In particular, it was explained that the amount of money to be recovered is determined by the court on the day the court decision (sentence, ruling, determination) is issued. Moreover, the amount cannot be less than the value of the property obtained by criminal means at the time of the offence; the value of the property acquired with funds obtained by criminal means at the

time of its acquisition; the amount of income received from the use of this property at the time of its receipt (part two of item 9).

37. The Law No. 61-3 dated 17.02.2025 amended Article 132 of the Criminal Procedure Code, which defines the grounds and mechanism for the seizure of property by the body engaged in criminal proceedings as a provisional measure to compensate for damage (harm) caused by a crime or to recover income obtained by criminal means, a civil claim, other property recoveries, and special confiscation. In particular:
- a mechanism for seizing cryptocurrency has been defined;
 - the procedure for the seizure of funds held in accounts and/or deposits in banks and/or non-bank financial institutions, electronic money and cryptocurrency, regardless of ownership, if they are the subject of a crime, has been established, as well as the grounds for the cancellation of such a provisional measure (failure to confirm the fact that the specified property is the subject of a crime or termination of proceedings).
38. The powers of the criminal prosecution body and the court to collect evidence have been expanded by granting authority to obtain information from information resources (systems), databases and data banks of state bodies and other organizations, including through remote access, in automatic (automated) modes and the procedure for attaching such information to materials and criminal cases (Article 103 of the Criminal Procedure Code).
39. According to item 3 of the Decree of the President of the Republic of Belarus No. 269 dated August 29, 2023 "On measures to counteract unauthorized payment transactions", the General Prosecutor's Office, the State Security Committee, the Investigative Committee, or the Ministry of Internal Affairs may decide to suspend for up to 10 days debit transactions on a bank account, deposit account, or electronic wallet of a payment service user who is a participant in an unauthorized payment transaction or an attempt to conduct one, and in relation to whom there is information (suspicion) indicating his participation in illegal actions.

Recommendation 24 (rated LC in the MER)

40. On October 1, 2024, the Law of the Republic of Belarus No. 365-Z dated April 22, 2024 "On Amendments to Laws on Entrepreneurial Activity" (hereinafter referred to as the Law) came into force.
41. The draft Law of the Republic of Belarus "On State Registration and Liquidation (Termination of Activities) of Business Entities", adopted by the House of Representatives of the National Assembly of the Republic of Belarus in the first reading on June 30, 2025, proposes the inclusion in the Unified State Register of Legal Entities and Individual Entrepreneurs of information on the beneficial owners of commercial organizations, with the exception of joint-stock companies, which will be submitted by applicants during state registration of legal persons.
42. The draft law also requires commercial organizations to notify the registration authority of changes in beneficial ownership information.

IV. CHANGES AIMED AT IMPROVING THE EFFECTIVENESS OF THE NATIONAL AML/CFT SYSTEM

Immediate Outcome 1 (substantial)

43. In 2024, the National Bank conducted a sectoral risk assessment for the period 2021–2023. This covered the banking sector, non-banking financial organizations (including leasing, microfinance and foreign exchange companies), payment service providers and online lending service operators. The

aim was to update previously identified ML/TF risks and assess risks in new sectors. A summary of the assessment is [available](#) on the National Bank's website³.

44. In accordance with Law No. 165-Z, established by order of the Minister of Antimonopoly Regulation and Trade of the Republic of Belarus No. 107 dated 4 May 2018, a group conducted an assessment of the ML/TF risks of the Belarusian Universal Commodity Exchange OJSC in 2025. Based on these results, a report on the ML/TF risk assessment in exchange trading was prepared and approved by the Minister of Antimonopoly Regulation and Trade. The Ministry of Antimonopoly Regulation and Trade recognized the degree of ML/TF risk in exchange trading as low.
45. Based on the results of the risk assessment conducted by the State Institution 'Secretariat of the High-Tech Park Supervisory Board' regarding the legalization of the proceeds of crime, the financing of terrorism, and the financing of the proliferation of weapons of mass destruction arising from the activities of High-Tech Park residents engaged in transactions (operations) involving tokens, the degree of risk associated with such activities is assessed as moderate.
46. During the period of validity of the Presidential Decree of the Republic of Belarus No. 48 dated 14 February 2022 No. 48 'On the Register of Addresses (Identifiers) of Virtual Wallets and Features of the Circulation of Cryptocurrency', 425 addresses (identifiers) of virtual wallets used (being used) for illegal activities were included in the register.
47. Since the start of 2022, 1,616 attempts to carry out financial transactions using virtual wallet addresses (identifiers) that were deemed high-risk have been detected.

Immediate Outcome 2 (substantial)

48. In 2024, the State Institution 'Secretariat of the High-Tech Park Supervisory Board' sent a request to the Ministry of Internal Affairs of the Russian Federation due to suspicions about the authenticity of the document submitted for the organization's registration as a crypto resident of the High-Tech Park. Based on the information received, it was established that the document submitted to the Secretariat was invalid.

Immediate Outcome 3, 4 (moderate)

49. The approach to identifying and recording violations has been optimized. Codes have been developed for the different types of violation, and regular analysis of control activities is carried out to improve their effectiveness (information from the Follow-up Report of the Republic of Belarus for 2020–2022).
50. In addition, Regulation 197 (clauses 7 and 8) stipulates that the unit conducting inspections of NFOs must submit information on codes of violations of legislative requirements to the remote control unit annually. This information must include details of the dynamics of violations identified during the reporting year compared to the previous year, and must be used to bring entities to administrative responsibility based on the results of inspections conducted. The aim is to analyze the effectiveness of control activities and inform further consideration in the work when planning and conducting inspection activities.
51. A similar interaction has been established with the unit responsible for conducting inspections of banks.
52. Instruction 501 sets out the AML/CFT internal control requirements for new entities – namely, issuers of electronic money that are not banks. Amendments to Recommendation 783 extend the ML/TF risk management provisions to the issuers of electronic money.

³ <https://www.nbrb.by/legislation/documents/Itogi-sectoralnoj-ocenki-riskov-legalizacii-dohodov.pdf>

53. In 2022, three sample audits of notaries were conducted. One notary was found to be in violation of AML/CFT legislation. An order to rectify the violations was issued. The violations were subsequently rectified. The notary was not held administratively liable.
54. In fact, in 2024, a notary was held administratively liable in the form of a fine for certifying a power of attorney in violation of AML/CFT legislation requirements.
55. In 2025, measures were taken to ensure that notaries replaced special forms in the Financial Monitoring Department's database in accordance with the established procedure. Response measures were applied to notaries who violated AML/CFT legislation.
56. From 2022–2025, seminars and webinars were held for notaries, letters and recommendations have been sent, and notaries have been certified and an article has been published in the 'Justice of Belarus' journal. Notaries' activities have been coordinated, AML/CFT/CPF practices have been implemented, reports have been analyzed and proposals have been made to improve AML/CFT/CPF legislation, and regulatory and local legal acts have been adopted to regulate notaries' AML/CFT/CPF activities.
57. In 2022, two sample audits were conducted; in 2023, three sample audits were conducted; in 2024, two sample audits were conducted; and in the current period of 2025, one sample audit of lawyers was conducted. No violations of AML/CFT legislation were found.
58. From 2022 to 2025, thematic training has been organized as part of professional development at the Educational Institution 'Institute for Retraining and Qualification Upgrading of Judges, Prosecutors, Courts and Legal Professionals at the Belarusian State University' for organizations providing real estate services and legal services, as well as for individual entrepreneurs. From 28 October 2024, this training has also been made available to lawyers.

Immediate Outcome 4 (moderate)

59. The Belarusian Universal Commodity Exchange OJSC has signed information exchange agreements with regulatory and law enforcement agencies of the Republic of Belarus, under which information on the progress and results of trading is provided (Ministry of Internal Affairs of the Republic of Belarus, Ministry of Taxes and Duties of the Republic of Belarus, Operations and Analysis Center under the President of the Republic of Belarus), as well as online information from the database of the electronic trading platform of the Belarusian Universal Commodity Exchange OJSC for electronic procurement (Financial Investigations Department of the State Control Committee of the Republic of Belarus, State Control Committee of the Republic of Belarus).
60. From 2024 to 2025, the Ministry of Taxes and Duties has selected three gambling operators for unscheduled inspections. As of 01.09.2025, two inspections have been completed, one inspection is ongoing, and one gambling operator has been found to have committed AML/CFT violations (failure to conduct AML/CFT risk assessments and violation of the established procedure for customer questioning). Those responsible have been held administratively liable in accordance with the legislation.
61. In cooperation with law enforcement agencies, work is underway to suppress the activities of 'droppers' and minimize the possibility of illegal withdrawals from gambling players' accounts. As a result, between 2024 and 2025, 8 gambling operators were charged taxes in connection with the application of an increased personal income tax rate, and the guilty parties among the gambling operators were held administratively liable in accordance with legislation.
62. In 2024, the court found that a bank payment card and the login and password details for accessing a virtual gambling establishment had been transferred from one person to another. The court declared this transaction null and void. All proceeds received by the parties involved in the transaction were confiscated and converted into the budget revenue.

63. In 2023, it was discovered that a business was operating in the gambling industry without a license. Based on the results of the inspection, the organization was charged taxes and imposed administrative penalties as established by the legislation.
64. Between 01.11.2022 and 31.08.2025, administrative proceedings identified a total of 4 violations relating to non-compliance with AML/CFT measures and 221 relating to improper KYC. Those responsible were held administratively liable in accordance with the legislation.
65. Between 01.11.2022 and 31.08.2025, as part of licensing supervision, 18 gambling operators were issued with orders to rectify violations of licensing requirements relating to AML/CFT, namely for the existence of administrative liability for AML/CFT legislation violations by a legal entity, its director or deputy directors; a natural person who is the founder (participant) of a legal entity - 2 orders; and for improper KYC – 16 orders.
66. Online casinos are monitored by an interdepartmental commission comprising representatives of the Operations and Analysis Center under the President of the Republic of Belarus, the Ministry of Taxes and Duties, and Gambling Business Monitoring Center LLC, in order to assess the compliance of virtual gambling establishments with the requirements established by the legislation. A total of 6 such expert assessments were conducted between 01.11.2022 and 31.08.2025. Following the expert assessments of virtual gambling establishments, the monitoring center continuously monitors their operations as part of the relevant integration tests and remote access to the establishments. Between 01.11.2022 and 31.08.2025, the relevant integration tests and remote access were carried out in relation to all 8 virtual gambling establishments operating in the Republic of Belarus.
67. Information posted on the Internet is monitored on an ongoing basis to identify websites where gambling activities are carried out in our country, in violation of Belarusian legislation. As of 01.09.2025, 8,029 websites containing information prohibited for distribution in the Republic of Belarus on the organization and/or conduct of gambling using the Internet in violation of the requirements of legislative acts regulating activities in the field of gambling have been blocked in accordance with the procedure established by the legislation.
68. Training events for tax authority specialists on the supervision of gambling operators are usually held annually. These events cover topics such as compliance with AML/CFT legislation and the use of a special computerized cash register system to monitor turnover in the gambling business. For instance, training for tax authorities' specialists was held from 30 October to 2 November in 2023 and from 28 October to 1 November in 2024.
69. Supervised entities are provided with ongoing training and advice on the use of new and existing functionalities of the specialized system, as well as on AML/CFT issues. This is provided by the Gambling Business Monitoring Center LLC and the Center for Advanced Training of Managers and Specialists in the Financial System. Between 01.11.2022 and 31.08.2025, approximately 600 representatives of gambling organizers and 761 tax consultants received training and advice.
70. Between 01.11.2022 and 31.08.2025, 11 requests from supervised entities on AML/CFT issues were reviewed, and 15 information letters containing explanations and recommendations on the application of AML/CFT legislation and KYC procedures were sent.
71. The official website of the Ministry of Taxes and Duties', nalog.gov.by, has a special section entitled 'Compliance with AML/CFT Legislation', containing regulatory legal acts, information and explanations relating to AML/CFT. Articles related to AML/CFT are also published in Taxes of Belarus magazine.
72. The official website of the Chamber of Tax Advisers (pkbel.by) has a special section entitled 'Prevention of Money Laundering, Financing of Terrorism and Financing of the Proliferation of

Weapons of Mass Destruction', containing regulatory legal acts, information and explanations relating to AML/CFT.

Immediate Outcome 7 (moderate)

73. According to statistics from the Ministry of Internal Affairs, 6 crimes were recorded under Article 235 (legalization of the proceeds of crime) of the Criminal Code of the Republic of Belarus between 2023 and 2024.
74. According to statistics from the Supreme Court, three persons were convicted between 2023 and the first half of 2025.
75. The following criminal case can be cited as an example of a successful prosecution for an ML crime.

By the cumulative sentence of the district court for the crimes provided for in Part 4 of Article 205, Part 3 of Article 235 of the Criminal Code (grand theft committed by an organized group, legalization ('laundering') of the proceeds of crime committed by an organized group on an especially large scale), and other elements of crimes, taking into account the changes made by the appeal ruling of the regional court, the following persons were convicted: Kh. - to 10 years' imprisonment with a fine of 400 base values, Zh. - to 7 years' imprisonment, Ya. - to 6 years and 6 months' imprisonment with deprivation of all rights to engage in entrepreneurial activity for 5 years, with the main sentence to be served in a maximum security corrective colony.

The court found that, in 2016, Kh., in criminal conspiracy with Ya., Zh. and other unidentified persons with expertise in the criminal car business, created and led an organized group whose criminal activities consisted of stealing cars in the Russian Federation and delivering them to the territory of the Republic of Belarus. The group also falsified vehicle and engine identification numbers and documents, legalized the stolen vehicles by registering them with the State Traffic Safety Inspectorate and ensuring their admission to road traffic (passing technical inspection and concluding civil liability insurance contracts), and concluded sale and purchase transactions with persons unaware of the crimes committed. The organized group disposed of the proceeds from the legalization of stolen vehicles on an especially large scale at its own discretion.

Immediate Outcome 8 (moderate)

76. In order to seize property obtained by criminal means or that is deliberately involved in the commission of a crime — that is, to eliminate the material basis of the crime, both as a result of its commission and as a means of ensuring its commission — the criminal law of the Republic of Belarus has established the institute of special confiscation. This is a criminal law consequence of a crime, the objects of which, in accordance with Article 46-1 of the Criminal Code, are:
 - property obtained by criminal means or acquired with the proceeds of crime;
 - income derived from the use of this property;
 - targets of crime, if they are not subject to return to the victim or other person;
 - weapons and instrumentalities of crime belonging to the guilty party;
 - res extra commercium;
 - the amount of money corresponding to the value of the property obtained by criminal means, acquired with the proceeds of crime, and/or the amount of income derived from the use of such property.
77. According to statistics from the Supreme Court, special confiscation was applied to 9,174 convicted persons between the 2023 and the first half of 2025.

78. The prosecution authorities also keep statistics on the recovery of the monetary equivalent of the proceeds of crime under Article 46-1 of the Criminal Code. During the said period, such recovery took place in respect of 1,176 persons for a total amount of 48.7 million rubles.

Confiscation of criminal proceeds

By a ruling of the district court, D. was found guilty of bribery and sentenced under Parts 2 and 3 of Article 430 of the Criminal Code to 7 years and 6 months' imprisonment, a fine of 5,000 base values payable to the state, and deprivation of the right to hold certain positions for 5 years.

The court found that D., one of company B's managers, had repeatedly received bribes totaling over USD 770,000 in exchange for making favourable decisions on matters within his competence. Cash equivalent to USD 3 million in various currencies was found at D.'s place of residence.

According to the sentence, the funds paid as bribes were converted into state revenue. The remaining funds were also converted into state revenue by the court, based on a pre-trial cooperation agreement with D. One of the conditions of this agreement was that the guilty party take actions aimed at mitigating the harm caused by the crime.

Compensation for damages to victims from the convicted person's property

During the preliminary investigation into the criminal case against P., the investigator ordered the seizure of the accused's property, including digital tokens totaling USD 42,700 in USD Coin and USD 440,000 in Tether USDT. The tokens were then placed in storage in a departmental crypto wallet.

By the sentence of the court, P. was convicted under Part 4 of Article 206 of the Criminal Code (open grand theft of property (robbery), by a group of persons), Part 4 of Article 16 and Part 4 of Article 206 of the Criminal Code (organizing grand robbery, repeatedly, by a group of persons) and other elements of crimes to 8 years' imprisonment with a fine of 1,000 base values. The court upheld the civil claims of the victims for compensation for property damage and material compensation for moral damage. P.'s seized property was taken to satisfy civil claims, fines, and other property penalties.

As part of enforcement proceedings, the bailiff transferred the digital tokens to a company that stores and sells seized property. The proceeds from selling the tokens were distributed among the claimants to settle their claims.

Confiscation of the monetary equivalent

By the sentence of the district court, S. was convicted under Part 4 of Article 328 of the Criminal Code to 12 years' imprisonment with a fine of 300 base units. He was found guilty of large-scale illegal drug trafficking committed by an organized group. The court established that during the period of illegal activity, S. received criminal proceeds of over USD 30,000, which he disposed of at his discretion. The monetary equivalent of the property obtained by criminal means was confiscated into the state revenue.

Immediate Outcome 9 (substantial)

79. According to statistics from the Ministry of Internal Affairs for 2023-2024, 30 crimes under Article 290-1 of the Criminal Code were registered. According to data from the Supreme Court of the Republic of Belarus for 2023 and the first half of 2025, 18 persons were convicted under Article 290-1 of the Criminal Code.

Immediate Outcome 10 (moderate)

80. The Ministry of Justice has reviewed the financial statements of all non-profit organizations for the purpose of supervising the NPO sector, taking into account the TF risks. No public associations or foundations involved in TF were identified during the verification activities.

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81. The Ministry of Justice has developed a methodology for conducting a national assessment of the risks of legalization (laundering) of the proceeds of crime and the financing of terrorist activities within the non-profit sector. Risk assessments are also carried out during audits and in response to complaints from citizens and legal entities, as well as at the Ministry's own initiative.
 82. The Ministry of Justice holds twice-yearly seminars with representatives of public associations and foundations to discuss compliance with legislation, clarify the provisions of current legislation and address legislative innovations. Representatives of public associations and foundations are made aware of their obligation to comply with legislation relating to the prevention of money laundering and the financing of terrorism.
 83. Similar seminars for representatives of local public associations and foundations are held in all regions and in Minsk by the main justice departments of the regional executive committees and the Minsk City Executive Committee.
 84. In the course of interacting with leaders of public associations on issues related to the state registration of public associations and foundations, and the state registration of changes made to the articles of association of these organizations, officials from the justice authorities inform them of the need to comply with legislation, including on issues related to the prevention of money laundering and the financing of terrorism.
 85. The website of the Ministry of Justice for public associations and foundations contains regularly updated information on the legal regulation of non-profit organizations' activities in relation to the prevention of money laundering and TF.

*Annex 1***List of amendments to the legislation of the Republic of Belarus**

- Code of the Republic of Belarus No.441-Z dated 25.10.2000 (amended by Law of the Republic of Belarus No. 282-Z dated 12.07.2023 'On Amendments to Laws on Banking Activities');
- Law of the Republic of Belarus No. 165-Z dated 30.06.2014 'On Measures to Prevent the Legalization of the Proceeds of Crime, the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction' (as amended);
- Presidential Decree of the Republic of Belarus No. 196 dated 25 May 2021 'On Online Borrowing Services and Leasing Activities';
- Presidential Decree of the Republic of Belarus No. 416 dated 11 November 2024 'On Activities on Financing for the Assignment of Monetary Claims (Factoring)';
- Instruction on the procedure for providing payment services in the Republic of Belarus, approved by Resolution of the Board of the National Bank of the Republic of Belarus No. 453 dated 05.12.2022;
- Instruction on requirements for internal control rules in the field of the prevention of money laundering, the financing of terrorism and the financing of the proliferation of weapons of mass destruction in the conduct of electronic money transactions, approved by Resolution of the Board of the National Bank of the Republic of Belarus No. 501 dated 28.12.2023;
- Instructions on the procedure for state registration and liquidation of banks, non-bank credit and financial institutions, and licensing of banking activities, approved by Resolution of the Board of the National Bank of the Republic of Belarus No. 640 dated 07.12.2012 (as amended by Resolution of the Board of the National Bank of the Republic of Belarus No. 503 dated 29.12.2023);
- Instruction on requirements for internal control rules in the field of the prevention of money laundering, the financing of terrorism and the financing of the proliferation of weapons of mass destruction in the conduct of banking operations, approved by Resolution of the Board of the National Bank of the Republic of Belarus No. 818 dated 24.12.2014 (as amended by Resolution of the Board of the National Bank of the Republic of Belarus No. 84 dated 10.03.2023);
- Resolution of the Board of the National Bank of the Republic of Belarus No.3 dated 10.01.2025, amending Instruction 453;
- Resolution of the Board of the National Bank of the Republic of Belarus No. 82 dated 27.02.2018 'On Approval of Risk Assessment Criteria' (as amended and supplemented by Resolution of the Board of the National Bank of the Republic of Belarus No. 320 dated 09.10.2024);
- Resolution of the Board of the National Bank of the Republic of Belarus No.108 dated 08.05.2025 'On Requirements for Non-Credit Financial Institutions and Registers of Non-Credit Financial Institutions';
- Resolution of the Board of the National Bank of the Republic of Belarus No. 164 dated 16.06.2021 'On the Reporting Form by Institutions Carrying Out Financial Transactions' (as amended and supplemented by Resolution of the Board of the National Bank of the Republic of Belarus No. 38 dated 06.02.2024);
- Resolution of the Board of the National Bank of the Republic of Belarus No. 260 dated 21.07.2023 'On Approval of the Regulation on the Specifics of Remote Control over the Activities of Institutions Carrying Out Financial Transactions in Terms of Their Compliance with the Legislation on the Prevention of Money Laundering, the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction' (as amended and supplemented by Resolution of the Board of the National Bank of the Republic of Belarus No. 346 dated 04.11.2024);

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- Resolution of the Board of the National Bank of the Republic of Belarus No. 388 dated 16.12.2021 'On Reporting Form 1050 'On Financial Transactions and Customers Subject to Identification' (as amended and supplemented by Resolution of the Board of the National Bank of the Republic of Belarus No. 266 dated 26.08.2024);
 - Regulations on the interaction of structural units of the central office and the Training Center of the National Bank on issues related to monitoring compliance by institutions with legislation on the prevention of money laundering, the financing of terrorist activities and the financing of the proliferation of weapons of mass destruction, approved by Order of the Chairman of the Board of the National Bank of the Republic of Belarus No. 197 dated 28.06.2024;
 - Recommendations on managing risks associated with money laundering, financing of terrorism and financing of the proliferation of weapons of mass destruction, approved by Resolution of the Board of the National Bank of the Republic of Belarus No. 783 dated 17.12.2014 (as amended by Resolution of the Board of the National Bank of the Republic of Belarus No. 222 dated 22.07.2024).

Annex 2

INFORMATION
on the outcomes of the work of the Financial Monitoring Department

No.	Work performed	Outcome		
		2023	2024	January– June 2025
1.	Reports received on financial transactions subject to special control, including:	149,638	162,397	75,545
2.	Reports sent, including:	1,288	1,346	869
	– upon requests	636	799	438
	– proactively	652	547	431
2.1.	To the Financial Investigations Department, including:	362	293	218
	– upon requests	131	147	91
2.2.	To the Public Prosecutor's Office, including:	1	1	3
	– upon requests	1	1	2
2.3.	To the Investigative Committee, including:	27	48	71
	– upon requests	27	47	71
2.4.	To the State Security Committee, including:	190	195	99
	– upon requests	23	60	44
2.5.	To the Ministry of Internal Affairs, including:	417	448	261
	– upon requests	363	404	169
2.6.	To the FIUs of foreign states, including:	145	169	98
	– upon requests	38	58	26
2.7.	To the Ministry of Taxes and Duties, including:	3		14
	– upon requests	3		2
2.8.	to the bodies and units of the State Control Committee, including:	126	160	78
	– upon requests	35	50	10
2.9.	to other interested authorities, including:	17	32	27
	– upon requests	15	32	23
3.	Financial sanctions imposed by the competent authorities using information from the Financial Monitoring Department, USD equivalent	33,873,558	20,722,153	15,583,711
4.	Funds recovered using information from the Financial Monitoring Department, USD equivalent	23,562,773	10,988,118	10,258,038
5.	Crimes detected by law enforcement agencies using information from the Financial Monitoring Department	159	320	86