

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



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**REPUBLIC OF BELARUS: FIRST REGULAR FOLLOW-UP REPORT
(WITHOUT RE-RATING)**

Issue:	This document describes measures taken by the Republic of Belarus for improving technical compliance with FATF 40 Recommendations and enhancing effectiveness of the national AML/CFT system since adoption of the MER under the second round of the EAG mutual evaluations in November 2019.
Expected Outcome(s):	For information

Issue

1. This Follow-up Report contains information on certain steps aimed at eliminating the deficiencies in technical compliance with R.1, R.8, R.10, R.13, R.15, R.16, R.17, R.18, R.22, R.26, R.28, R.33, R.37, R. 38 and R.39, ensuring compliance with the modified R.15 and enhancing effectiveness of the national AML/CTF system in achieving Immediate Outcomes 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 11 taken by the Republic of Belarus since adoption of the MER under the second round of the EAG mutual evaluations in November 2019.
2. The Republic of Belarus does not request to re-rate technical compliance with any FATF Recommendations, and therefore this Follow-up Report is presented for information only.

Overview of Progress Made

3. Based on the presented information the following conclusions can be made:
 - Since the on-site visit in March 2019, the Republic of Belarus has made significant steps to address the identified deficiencies. In particular, Law No.14-3 introduced the relevant amendments into the AML/CFT Law (Law 165-Z) and some other agency-level regulations.
 - A substantial work has been done for strengthening national coordination and cooperation, inter alia, for CFT purposes.
 - The Belarusian authorities have developed mechanisms for risk-based supervision of the NPO sector, inter alia, for raising awareness of possible misuse/ abuse of non-profit organizations.
 - More stringent requirements have been established for identification and verification of beneficial owners and politically exposed persons.
 - The approaches to supervision of DNFBPs, collecting statistics and ensuring adequate international cooperation have been reinforced.
 - The regulations setting requirements applicable to virtual assets have been developed, and measures have been taken for eliminating the deficiencies related to the use of new technologies.

Next Steps

4. It is recommended for the Plenary to take note of the first Follow-up Report without re-rating and request the Republic of Belarus to continue the work aimed at addressing the deficiencies identified in the MER and present the second regular Follow-up Report at the 43rd EAG Plenary Meeting in November 2025.

REPUBLIC OF BELARUS: FIRST REGULAR FOLLOW-UP REPORT

I. INTRODUCTION

5. The Mutual Evaluation Report (MER) of the Republic of Belarus was adopted by the 31st EAG Plenary Meeting in November 2019 and posted on the EAG website after it was endorsed by the FATF as complying with the international standards of quality and compliance of the Global Network reports.
6. This Follow-up Report contains information on progress made by the Republic of Belarus in addressing the technical compliance deficiencies identified in the MER and enhancing the effectiveness of the national AML/CFT system since November 2019 through October 2022. The Report also provides information on the changes in the national AML/CFT system triggered by the updates to the FATF Recommendations that were adopted after the completion of the on-site visit to the Republic of Belarus.
7. This Report is presented for information as the Republic of Belarus does not request to re-rate technical compliance with any FATF Recommendations.

II. FINDINGS OF THE MUTUAL EVALUATION REPORT

8. The MER rated Belarus for effectiveness and technical compliance with the FATF Recommendations as follows:

Table 1: Effectiveness Ratings¹

IO.1	IO.2	IO.3	IO.4	IO.5	IO.6	IO.7	IO.8	IO.9	IO.10	IO.11
S	S	M	M	L	S	M	M	M	M	S

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

9. Given the mutual evaluation results, the EAG placed the Republic of Belarus in a regular follow-up.

III. OVERVIEW OF CHANGES TO IMPROVE TECHNICAL COMPLIANCE

10. This Section contains information on measures taken by the Republic of Belarus to:
 - a. Address the technical compliance deficiencies identified in the MER,
 - b. Bring the national legislation in line with the requirements of new FATF Recommendations that came into force after the completion of the on-site visit to the Republic of Belarus.

3.1. CHANGES AIMED AT ADDRESSING TECHNICAL COMPLIANCE DEFICIENCIES IDENTIFIED IN THE MER

11. In the period under review, the Belarusian authorities have adopted a number of AML/CFT-related laws and regulations (see Annex 1):

¹ S - Substantial, M - Moderate, L - Low.

² C - Compliant, LC - Largely Compliant, PC - Partially Compliant, NC - Non-Compliant, NA - Not Applicable.

Recommendation 1 (originally rated LC)

12. The AML/CFT/CPF activities of the government authorities and the High-Tech Park Administration (HTP Administration) are coordinated by the Interagency Anti-Money Laundering, Counter-Terrorist Financing and Counter-Proliferation Financing Commission (hereinafter the IAC), the statute and composition of which are adopted by the Council of Ministers of the Republic of Belarus (Law 165-Z, Art.15-1). The Interagency Commission held two meetings: in April 2021 (at which the composition of the IAC Secretariat was approved) and in April 2022, respectively.
13. The obligation, timeframe and frequency of updating the sectoral ML/TF/TRMF risk assessment are set out in legislation, namely it shall be updated as necessary, but at least once every three years» (Law 165-Z, Art.16, Par.2(a)).
14. One of the main areas of internal control is to conduct a ML/TF/FTMF risk assessment, documenting at least once every three years the reasons, procedures and results of such assessment and keeping them up to date, as set out in Regulation No 1249 (Par. 11-12).
15. The relevant requirements have been extended by the state authorities and the HTP Administration to all reporting entities involved in financial transactions.
16. For example, in the area of state registration of immovable property, rights thereto and transactions therewith, changes in the definition and assessment of risks are enshrined in Instruction No. 36. Internal controls for this category are implemented using a risk-based approach on the basis of internal control rules. The AML/CFT/PF internal control procedures should provide for an ML/TF/PF risk assessment, documenting at least once every three years the grounds, procedures and results of such assessment and keeping them up-to-date (Par.3). The State Property Committee assesses ML/TF risks in the area of state registration of immovable property, rights thereto and transactions therewith, communicates the results of this assessment to state registration agencies and updates it as necessary, but at least once every three years (Par. 26).
17. Listed in Annex 4 to Instruction 367 are the indicators of suspicious financial transactions that are applied by all financial and non-financial sector entities engaged in financial transactions. In view of the amendments introduced into Instruction 367, the guidelines regarding indicators of suspicious ML/TF/PF-related financial transactions and criteria of identification of such transactions (outlined in State Property Committee Letter No.11-12/7966/vn dated 20.11.2020) have been updated accordingly and shall be used by the obliged entities when carrying out financial transactions with real estate property.

Recommendation 8 (originally rated PC)

18. The Ministry of Justice determines the contents and the procedure of keeping and communicating by public associations and foundations of their activity reports and other information necessary for taking measures to prevent terrorist and proliferation financing (Law 165-Z, Art.9-2, Resolution 153-1).
19. The contents of reports on receipt and use of funds and other assets that public associations and foundations are required to submit annually (not later than March 1) to the justice authorities have been further detailed (Resolution 209). At present, public associations and foundations are obliged to provide to the registration authorities and make publicly available extended information on continuation of their activities. Information on receipt of funds and other assets shall include, *inter alia*:
 - information on funds and other assets received from international and foreign organizations with indication of details of such organizations as well as the amounts of received funds and specific assets;
 - information on funds and other assets received as grant assistance (sponsor support).

20. Information on funds and other assets spent by public associations and foundations (that is subject to disclosure) is also extended and shall include details of the use of funds and other assets (with indication of amounts and events) received:
- as admission fees and membership contributions;
 - as revenues from lectures, exhibitions, sports and other events;
 - as revenues from business activities;
 - as voluntary donations;
 - from foreign and international organizations;
 - as grant assistance (sponsor support);
 - from other sources.
21. Information on continuous activities of public associations and foundations and well as information on funds and other assets received and used by them in 2020-2021 is posted in the relevant sections of the websites of the Ministry of Justice, the Justice Departments of the Regional Executive Committees and the Justice Department of Minsk City Executive Committee.
22. The Ministry of Justice drafted, in coordination with the State Control Committee, the Action Plan aimed at mitigating TF risks in the NPO sector in 2022-2023, which was approved by the Interagency Commission. The Ministry of Justice is tasked with monitoring the implementation of the Action Plan, including, *inter alia*, the following actions:
- Enhance the effectiveness of monitoring of compliance with orders issued following inspections/ audits of non-profit organizations conducted by the Ministry of Justice and local justice authorities;
 - Conduct, in cooperation with other government authorities, preliminary inspections/ audits of all public associations with a view to improving the application of a risk-based approach and streamlining further efforts aimed at preventing the misuse of public associations for TF purposes until August 1, 2022;
 - Present a progress report on implementation of the Action Plan in the NPO sector as well as information of results of preliminary inspections/ audits of public associations at the next meeting of the Interagency Commission.
23. The Ministry of Justice drafted a Methodology of assessment of risks related to misuse of the NPO sector for TF purposes, including sources of information and data collections forms and methods, which was submitted for review and approval to the Regional Executive Committees, Minsk City Executive Committee, the Financial Monitoring Department and the Office of the Commissioner on Religious and National Affairs.
24. In 2021 – 2022, all public associations were subject to inspections and audits. In particular, during the seven months of 2022, the justice authorities audited 1,902 public associations, of which 889 organizations were inspected by the Ministry of Justice.
25. Another mechanism of TF preventive control includes annual workshops held for public associations and other non-profit organizations. At these workshops, representatives of the registered organizations are informed, *inter alia*, about measures to be taken to prevent the abuse of NOPs for TF purposes.
26. In the second half of 2022, the Ministry of Justice held on-line workshop for representatives of public associations that were registered less than two years ago. Over 80 representatives of public associations took part in that workshop. Similar workshop is planned for the second half of 2022.

Recommendation 10 (originally rated LC)

27. Leasing companies, microfinance organizations (entities and other legal persons engaged in microfinance activities), forex companies, National Forex Center, banks, non-bank financial institutions operating in the OTC Forex market and online lending service operators are now obliged to obtain information on persons capable of shaping or influencing, directly or indirectly (through other persons), decisions made by customers who are individuals and individual entrepreneurs (Instruction 494, Annex 4, Par.1 and 2).
28. The new requirements for Internal Control Rules (ICR) of real estate companies, corporate and individual legal service providers, lawyers, law firms and notaries have been established. According to the new requirements, the Internal Control Rules shall include, *inter alia*, the available methods of verification of information about customers and their beneficial owners for placing them into the category of politically exposed persons, their family members and close associated as well as into the category of persons linked to terrorist activities (Guidelines 185, Section 4, Par.4.1 and Guidelines 186, Section 3, Par.3.1).
29. Besides that, the term “unincorporated entity” is defined, and the obliged persons engaged in financial transactions are now required to develop a list of ID data concerning such entities, their members and other beneficiaries (Law 165-Z, Art.8, Par.8).

Recommendation 13 (originally rated LC)

30. Instruction No.818:

- Defines the terms “respondent bank”, “correspondent bank”, and “correspondent banking relationships” (Par.2);
- Contains the list of internal controls applicable to respondent banks (Par.41.2) and correspondent banks (Par.41.2);
- Contains the list of additional ID data that shall be indicated in a respondent bank’s file (Annex 4).

Recommendation 15 (originally rated PC)

31. An obligation was established for persons carrying out financial transactions to identify and assess ML/TF/PF risks prior to introducing new services, changing the material terms or methods of service provision or introducing new technologies for carrying out financial transactions (Law 165-Z, Art. 6(1)(4)).
32. The application of this requirement is stipulated in Par. 4 (12)(1) of Resolution No. 1249 and is extended by the supervisory authorities to all categories of entities involved in financial transactions, considering the specifics of their activities.
33. For example, a commodity exchange must identify and assess ML/TF/PF risks prior to the introduction of new services, changes in the material terms or methods of service provision or the introduction of new technologies for financial transactions (Par.8 of Resolution 36). In accordance with this, the Internal Control Rules approved by the Protocol of the Meeting of the Management Board of the Belarusian Universal Commodity Exchange No. 31 of February 17, 2020 stipulate that for the purpose of ML/TF/PF risk management the exchange shall, in particular, determine and assess risks when using new products, when introducing and using modern information technologies for conducting financial transactions.
34. Similar requirements have been introduced for notaries (Instruction 184, Par. 6), for organizations providing real estate services, organizations and individual entrepreneurs providing legal services, lawyers (Instruction 183, Par.7), organizers of gambling (Resolutions 27, 46, Par.6).

Recommendation 16 (originally rated LC)

35. Requirements to accompany bank transfers with identification data on senders and recipients of funds became applicable to cases when financial transactions are performed by individuals through remote banking systems (Law 165-Z, Art.8, Par.19 and 24).
36. The payment system operator is now obliged to monitor money transfers for missing information provided for in the AML/CFT Law and apply risk-based measures, including refusal to perform money transfers (Law 164-Z Art.11, Par.21) and is also required to obtain, transmit and retain ID data when carrying out transfers which amount exceeds 100 basic units (Law 165-Z, Art.8, Par.21).
37. Beneficiary banks are now obliged to be able to obtain from ordering banks and ERIP Non-Bank Financial Institution additional ID data on originators of wire transfers within 3 business days for applying extended internal controls (Instruction 818, Par.58).
38. The procedure of transmitting additional data from an ordering bank to a beneficiary bank is set out in the General Terms and Conditions of Participation in the “Settlement” Single Information System in the Capacity of Settlement Agent and in the Regulation on Interaction between Owner and Settlement Agent adopted by ERIP Non-Bank Financial Institution Board Resolution No.21 dated May 26, 2021.

Recommendation 17 (originally rated LC)

39. A period of three days is established for identification agents during which they are obliged to provide data, information and documents (copies thereof) obtained in the process of identification to banks and entities engaged in financial transactions (Instruction 783, Par.33).

Recommendation 18 (originally rated LC)

40. Parent banks (companies) of banking (holding) groups are now required to develop consolidated internal AML/CFT control programs (Instruction 818, par.4). Therefore, the non-binding provision has been transformed into the mandatory requirement.
41. Entities engaged in financial transactions are now obliged to take necessary administrative measures for conducting effective internal monitoring, including analysis of application of internal controls, of their branches, stand-alone divisions and subsidiaries located abroad (Law 165-Z, Art.6, Par.1, Subpar.7).
42. Non-credit financial institutions are now required to conduct audits of their AML/CFT systems (Instruction 494, Par.22).

Recommendation 22 (originally rated LC)

43. In the process of identification (verification) of parties to financial transactions, dealers in precious metal and stones, audit firms and auditors providing professional services involving execution of financial transactions on behalf and (or) at the direction of their customers, lottery operators and operators of interactive games are now required to verify whether such parties are politically exposed persons (Resolution 96, Par.10).
44. The requirements for retention of information and documents obtained in the course of CDD and application of extended internal controls are set out in the relevant agency-level instructions, in particular: Instruction 184, Par.21 for notaries; Instruction 27, Par.7 for gambling operators; Resolution 96, Par.28 for dealers in precious metal and stones and audit firms and auditors providing professional services involving execution of financial transactions on behalf and (or) at the direction of their customers; and Instruction 185, Par.21 for real estate companies, corporate and individual legal service providers and lawyers.
45. The requirements for assessing ML/TF-related risks are also set out in the agency-level regulations, in particular: Instruction 36, Par.3 for state registrars of real estate property, titles thereto and transactions therewith; Resolution 96, Par.4 for for dealers in precious metal and stones and audit firms and auditors providing professional services involving execution of financial transactions on behalf and (or) at the direction of their customers; Instruction 184, Par.6 for notaries; Instruction 185, Par.7, Subpar.5 for real

estate companies, corporate and individual legal service providers and lawyers; and Instruction 27, Par.6 and 44 for gambling operators.

46. Resolution 36 states that, with a view to managing ML/TF/PF risks, the commodity exchange is required to identify and assess such risks prior to providing new services, in case of major events or developments in the provision of services and before launching new technologies for carrying out financial transactions (Par.8).
47. A new requirement has been established according to which, where real estate companies, corporate and individual legal service providers and lawyers use identification systems, their internal control rules shall contain information on such identification systems, including the procedure of their use (Instruction 185, Par.5, Subpar.3).

Recommendation 26 (originally rated LC)

48. The list of obliged entities engaged in financial transactions was supplemented with new categories of entities: special financial institutions, management companies of investment funds, tax advisers (Law 165-Z), online borrowing operators (Decree. 196), cell phone operators (Decree 260). The same legislative acts define the state bodies which supervise and monitor them for AML/CFT compliance.

Recommendation 28 (originally rated LC)

49. The list of obliged entities engaged in financial transactions covered by the AML/CFT legislation has been extended to include tax advisors among other DNFBPs. A new amendments have been introduced into Article 16 of Law 165-Z, according to which the government authorities and the High-Tech Park Administration are obliged to conduct, within their respective remit, a risk-based monitoring of compliance by entities engaged in financial transactions with the AML/CFT legislation. With a view to implementing these amendments in practice, the following resolutions were adopted:
 - Council of Ministers' Resolution No.361 dated June 24, 2020 on Amendments to RB Council of Ministers' Resolution No.1592 dated October 31, 2001 that tasked the Ministry of Taxes and Duties (MTD) to monitor compliance with the AML/CFT legislation not only by gambling operators, but also by tax advisors;
 - Ministry of Taxes and Duties (MTD) Resolution No.17 dated November 19, 2020 on Amendments to MTD Resolutions No.27 dated September 16, 2016 and No.23 dated November 3, 2017 that provided for adoption of the Instruction on requirements for internal control rules of tax advisors and amended MTD Resolution No.23 dated November 3, 2017 on Implementation of RB Presidential Decree 338 dated September 19, 2017 to include AML/CFT-related questions and tests into the tax advisor qualification exam.
50. Since April 1, 2019, the licensing requirements for online gambling operators are established (Par.2(a and b) of Annex to RB Presidential Decree No.305 dated August 7, 2018 on Improvement of Legal Regulation of Gambling Business): No administrative sanctions have been imposed on the legal entity, its head or deputy head or individual who is the founder (participant) of the legal entity; and the head or deputy head of the legal entity or individual who is the founder (participant) of the legal entity has no outstanding or expunged criminal record for committing crimes against the economic activities of the legal entity or individual who is the founder (participant) of the legal entity
51. Since July 1, 2019, the additional criteria for assessing ML/TF/PF risk level are applied in according to Annex 4 to MTD Order No.20 dated February 9, 2018 (as amended on 01.07.2019) that establishes individual criteria of assessing the level of risks for selecting obliged entities for conducting random inspections.

52. Order 25 establishes the list of criteria for selecting the obliged entities that are subject to random inspections. In particular, the following criteria and respective scores are established for notaries: (i) repeated (twice a year) breaches of the established customer questioning procedure provided for in the AML/CFT legislation (8 scores); (ii) repeated (twice a year) failure to submit a special reporting form to the financial monitoring agency (10 scores).
53. Training events, that include AML/CFT topics, are continuously held in the Center of Professional Development Training of Managers and Specialists of the Ministry of Finance of the Republic of Belarus and in the Institute of Professional Development Training and Re-Training of Economics Staff of the Belarusian State University of Economics. The training program includes, *inter alia*:
 - Training courses for natural persons seeking for a tax advisor qualification certificate;
 - Professional development training courses for tax advisors.
54. The outreach efforts included development and publication of a sample internal control rules for tax advisors and a memo on measures required for compliance with the AML/CFT legislation – both documents are publicly accessible. Besides that, the article entitled “Internal Control Rules for Tax Advisors” was published in the “Taxes in Belarus” magazine.

Recommendation 33 (originally rated LC)

55. The RB Supreme Court undertakes continuous efforts to improve the information gathering mechanisms, which includes upgrading of information systems. In particular, since January 1, 2021, all courts of general jurisdiction started to use the automated information system of courts of general jurisdiction of the Republic of Belarus (hereinafter CGJ AIS) that ensures a uniform practice of registration and management of cases and documents filed with the courts. The CGJ AIS system provides for registration of all types of cases, files and other procedural documents considered and processed by courts of different instances, which allows for improving quality and volume of both analytical and statistical information.
56. The RB Supreme Court has developed the updated forms of statistical reports of courts of general jurisdiction, and the work is currently underway to implement these forms in the CGJ AIS Statistical Reports Sub-system.
57. In particular, the RB courts of general jurisdictions collect semiannual and annual statistics related to: invalidation of state registration of business entities (number of cases considered and orders issued: 34 cases - in 2021; 5 cases - in the first half of 2022; cases considered in 2019 and 2020 were not separately indicated in the statistical forms); liquidation of legal entities (number of cases considered and orders issued: 179 cases - in 2019; 182 cases – in 2020; 167 cases - in 2021; and 107 cases – in the first half of 2022); and imposition of administrative liability under the RB Code of Administrative Offences Article 24.11 (failure to provide documents, reports and other information - (former Article 23.16) (number of persons held administratively liable: 7,081 – in 2019; 4,905 – in 2020; 2,714 – in 2021; and 1.333 – in the first half of 2022) and Article 24.43 (breach of the procedure of state registration of legal entities and individual entrepreneurs (former Article 23.64) (no persons were held administratively liable under this Article in 2019 – first half of 2022).
58. Besides that, information exchange between the CGJ AIS system and the automated information systems of government authorities and institutions most vital for administration of justice is continuously extended.
59. In particular, the RB Supreme Court has adopted, in coordination with the Department for Humanitarian Activities of the Office of the President of the Republic of Belarus, separate terms of reference, and the work is underway to exchange information between the Automated Information System of Courts of General Jurisdiction and the Government “Confiscated Assets” Information System through the National Automated Information System (NAIS). The completion of testing and

implementing the relevant services in the NAIS system for all government authorities and institutions involved in the information sharing process is scheduled for September 30, 2022.

Recommendations 37, 38 and 39 (originally rated LC)

60. The Department of International and Legal Affairs of the General Prosecutor's Office is obliged to ensure that requests of foreign competent authorities for extradition of persons committed ML/TF offences as well as for provision of legal assistance in such criminal matters are considered as a priority within the shortest possible time (Order 6, Par.3).

3.2. CHANGES AIMED AT COMPLYING WITH UPDATED RECOMMENDATIONS ADOPTED SINCE COMPLETION OF ON-SITE VISIT

61. Since completion of the on-site visit to the Republic of Belarus (in March 2019), changes have been introduced into Recommendation 15, for which Belarus is rated PC in the MER.

Recommendation 15 (originally rated PC)

62. Law 165-Z was amended as follows:

- The following new types of entities were included in the category of obliged entities engaged in financial transactions: residents of the High-Tech Park (HTP) involved in the following types of business activities: provision of services related to creation and placement of tokens with the use of the Internet, including token promotion services, consulting and other associated services; operate in the capacity of a crypto platform, cryptocurrency exchange operator; and carry out other business activities with the use of tokens similar to professional activities in the securities market and stock exchange, operation of investment fund, securitization and creation and placement of own tokens;
- The High-Tech Park Administration is authorized to monitor, within its purview, compliance by the HTP residents with the AML/CFT legislation.

63. The AML/CFT Law also provides that the High-Tech Park Administration performs monitoring as prescribed in Paragraph 4 of Article 16 and executes the powers specified in paragraph 2 of Article 16 in a manner determined by the RB President (Law 165-Z, Art.16).

64. Decree No.8 empowers the High-Tech Park Administration to monitor the HTC residents. Entities that are subject to inspection are obliged to provide workspace to inspectors in the office premises with automated workstations and access to the software used by the inspected entities and also provide access to the relevant data generated over the period indicated by the inspection team head (i.e. over the audited period). The Inspection Report is also signed by the members of the inspection team and other persons participated in the inspection, as may be decided by the inspection team head. In case of failure to comply with the order aimed at eliminating the identified deficiencies issued by the High-Tech Part Administration following the AML/CFT inspection, the HTP Administration requests the HTP Supervisory Board to cancel the HTP resident status of the inspected entity. Such punishment does not rule out possible application of other liability measures provided for in the legislation in respect of the inspected entity.

65. The requirements for the internal control rules of the HTP residents (indicated in subpar.1 of this paragraph) are adopted by the HTP Supervisory Board as advised by the HTP Administration.

66. With a view to complying with the AML/CFT legislation, the HTP residents may:

- Refuse to carry out a financial transaction for a customer if such transaction meets the criteria and indicators of suspicious financial transactions, which may constitute the grounds for denial of financial transaction in accordance with the internal control rules of a relevant HTP resident;

- Suspend a financial transaction for maximum three business days since the day when the instruction of a customer should be executed for making a decision whether the transaction should be carried out or denied in accordance with subpar.2 of this paragraph;
 - Unilaterally terminate in writing the financial service agreement if two or more decisions to refuse to carry out financial transactions for a customer have been made during two months.
67. The HTP residents must inform customers (customers' representatives) about suspension and (or) denial of a financial transaction and about unilateral written termination of a financial service agreement with indication of reasonable grounds by e-mail or otherwise as prescribed by the internal control rules of the relevant HTP resident.
68. Upon receipt of a relevant written request from a party to a financial transaction, the HTP residents must inform such party about suspension of the financial transaction ordered by the financial monitoring agency in accordance with Art.11, Par.1(4) of the Belarusian AML/CFT/CPF Law.
69. Besides that Decree No.48 was adopted with a view to improving the legislation aimed at mitigating the risk related to use of virtual wallets that have been or are misused for illegal activities in civil law transactions.
70. Assessment of risks of services rendered by the HTP residents is conducted prior to providing new services, in case of major events or developments in the provision of services and before launching new technologies. In addition to that, the level of risk posed by provided services shall be updated and the register of provided services shall be maintained (Regulation on Internal Control Rules of HTP Residents, Par.26-29).
71. With a view to mitigating (reducing) ML/TF/PF risks posed by resident customers engaged in financial transactions and non-resident customers that are financial institutions and DNFBSs, as defined in the FATF Recommendations, the HTP residents shall apply internal controls (Regulation on Internal Control Rules of HTP Residents, Par.30).
72. A HTP resident independently makes a decision to apply any measures. The applied measures shall be aimed at mitigating the risk of possible involvement of the HTP residents in the ML/TF/PF process.
73. The HTP residents shall conduct internal assessment of ML/TF/PF risks (internal risk assessment) on a regular basis, but not less than once in three years. Assessment of risks related to certain business lines of a HTP resident and of specific internal control mechanism is conducted more than once in three years, as necessary.
74. For arranging the internal risk assessment (*inter alia*, in respect of its branches, stand-alone divisions and subsidiaries located abroad), a HTP resident shall develop the assessment methodology, including frequency and grounds for assessment of risks related to separate business lines and specific internal control mechanisms, describe the assessment methods, compare the outcomes of a current assessment with the findings of the previous assessment, develop a risk mitigation action plan (for eliminating the identified deficiencies), appoint officers responsible for implementation of the action plan and established timelines for application of the relevant measures.
75. Findings of an internal risk assessment are documented in the internal risk assessment report that is approved by the executive officer responsible for implementation of internal controls.
76. In the process of management of ML/TF/PF-related risks, the HTP residents shall take measures to identify, categorize, describe and assess risks taking into account the risk factors that increase (reduce) the risks.

Recommendations 1, 2, 23 and 24

77. Belarus has taken measures to ensure technical compliance with the newly adopted requirements.

78. In particular, with a view to complying with the requirements for identification and assessment of risks related to potential breach, non-application or evasion of targeted financial sanctions for proliferation financing, amendments have been introduced into Law 165-Z related to application of internal controls and monitoring the activities of entities engaged in financial transactions (R.1). Besides that, Law 165-Z has been further amended to ensure adequate national coordination and cooperation for combating proliferation financing (R.2).
79. As regards the obligation of DNFBPs to apply group-wide programs (R.23), the obliged entities engaged in financial transaction are now required to “take necessary administrative measures for conducting effective internal monitoring, including analysis of application of internal controls, of their branches, stand-alone divisions and subsidiaries located abroad (Law 165-Z, Art.6).
80. With a view to ensuring a comprehensive approach to collecting beneficial owner information, legal entities are now obliged to identify their beneficial owners, have current and reliable information about them, document and retain the obtained information, and provide such information to the designated government authorities and the financial monitoring agency at their request as well as to obliged entities engaged in financial transactions (Law 165-Z, Art.8). Similar provision that came into force on January 1, 2022 was added to the RB Tax Code (Art.22, Par.1, Subpar 1.181).

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

Immediate Outcome 1 (substantial level of effectiveness)

81. The summary of findings of the regional risk assessment (RRA) conducted by the Eurasian Group on Combating Money Laundering and Financing of Terrorism is posted on the websites of all competent authorities, and the obliged entities have been informed about the need to update their internal risk assessments taking into account the identified regional risks.
82. When assessing a customer profile risk, postal service providers consider and take into account information about core activity of the customer, completeness of ID data provided by the customer and their consistency with available information obtained during verification process, information about business reputation of the customer and other information. Postal service operators have developed the AML/CFT/CPF internal control rules. Besides that, the executive officers responsible for practical implementation and ensuring compliance with these rules have been appointed by the internal orders of the postal service operators. Situations in which postal service operators providing postal transfer services are obliged to identify parties to financial transactions are specified in the internal control rules. Postal service operators have also developed the questionnaires for identification of customers and their representatives (acting on behalf of customers) in which customers shall indicate information about their beneficial owners, if any. With a view to identifying politically exposed persons, postal service operators included the relevant fields/ boxes in the postal order forms that shall be completed/ checked by customers that carry out financial transactions.
83. To ensure effective internal monitoring of financial transactions, postal service operators perform ML/TF risk management procedures. The risk factors that may increase (decrease) the level of risk assigned to a customer include customer type (profile), aggregated data obtained about the customer, types of financial transactions carried out by the customer, place of residence (location), place of business, etc. When a high level of risk is identified, an enhanced CDD is performed which includes subsequent mandatory registration of a financial transaction in the special reporting form. Where a low level of risk is identified, a simplified CDD is performed, which is limited to retention of information obtained during identification process and its further use for analysis.
84. The joint assessment of ML/TF situation in the postal service sector conducted in cooperation with the postal service operators shows that the postal service operators generally understand ML/TF vulnerabilities and risks and apply effective enough AML/CFT measures.

85. The updated reference book containing indicators of suspicious financial transactions is applied by all categories of obliged entities engaged in financial transactions in the financial and non-financial sectors. Besides that, the Guidelines regarding financial transactions with real estate property developed by the State Property Committee have been updated.
86. High level of understanding by registrars of risks related to transactions with real estate property is witnessed by analytical information on cooperation between the local state registration institutions and the Financial Monitoring Department (FMD), including information on number of special forms for registration of financial transactions that are subject to special monitoring (hereinafter special reporting forms) filed with the FMD. This information broken down by the reporting entities (i.e. local state registration institutions) is collected and analyzed on a monthly basis.
87. Analysis of information on actual volume of special reporting forms filed with the Financial Monitoring Department in the reviewed period and percentage of threshold and suspicious reports (of total number of special reporting forms submitted to the FMD) broken down by the local state registration institutions and their structural divisions allows for making a conclusion that the registrars apply a risk-based approach and identify suspicious indicators of financial transactions. There is a growing number of special reporting forms filed by the registrars upon identification of suspicious indicators. Of total number of special reporting forms filed in the reviewed period, the suspicious reports amounted to 53.7 percent in 2019; 54.1 percent in 2020; 59.1 percent in 2021; and 64.1 percent in the first half of 2022. The similar indicators in 2017-2018 were 4.9% and 17.2%, respectfully.
88. These performance indicators in the sector of state registration of real estate property, titles thereto and transactions therewith have been achieved as a result of comprehensive measures undertaken, including methodological support of operation of the state registration institutions, training events and upgrading of the software used by the registrars.

Immediate Outcome 2 (substantial level of effectiveness)

89. Pursuant to RB Law 53-Z dated August 18, 2020, Belarus acceded to the Protocol on Electronic Exchange of Information among the CIS Member Countries for Tax Administration Purposes dated November 2, 2018 (hereinafter the Protocol).
90. For proper enforcement of the tax legislation, the Protocol provides for sharing the following information among the tax authorities of the state parties:
 - information on certain types of income/ revenues of legal entities;
 - information on certain types of income/ revenues of natural persons;
 - information on certain types of property (assets) and its owners.
91. In Belarus, the services related to international postal transfers, including cross-border postal transfers, are provided by only one postal service operator – Belpost which is the national postal service operator and the designated operator tasked to fulfill the obligations under the Universal Postal Union treaties and regulations (RB Law on Postal Communication, Art.16).
92. Belarus is a party to the Postal Payment Services Agreement signed in Istanbul in 2016, along with other final acts of the Universal Postal Union. Pursuant to Article 7 of this Agreement, the designated operators of the UPU member states, including Belpost, apply AML/CFT measures.
93. With a view to extending the legal framework of cooperation, the following international agreements have been signed:
 - Agreement on Extradition between the Republic of Belarus and the Republic of Serbia dated December 3, 2019;
 - Agreement of the CIS member Countries on Combating Legalization (Laundering) of Criminal Proceeds, Financing of Terrorism and Financing of Proliferation of Weapons

of Mass Destruction dated October 15, 2021 (ratified by RB Law 191-Z dated July 12, 2022);

- Agreement on Exchange of Anti-Money Laundering and Counter-Terrorist Financing Information related to Movement of Cash and (or) Monetary Instruments across the Customs Border of the Eurasian Economic Union dated July 20, 2021 (ratified by RB Law 160-Z dated April 11, 2022).

94. Besides that, the following agreements came into force in the reviewed period:

- Agreement between the Republic of Belarus and Mongolia on Mutual Legal Assistance in Criminal Matters dated June 4, 2018 – the Agreement is effective since June 27, 2019;
- Agreement between the Republic of Belarus and the Arab Republic of Egypt on Mutual Legal Assistance in Criminal Matters dated October 20, 2010 – the Agreement is effective since August 10, 2020.

95. In 2019 – first half of 2022, a total of 23 international legal assistance requests were received by the RB Supreme Court, of which 1 request was related to money laundering and remaining 22 requests were related to predicate offences. Of 23 incoming foreign requests, 12 requests were sent based on the principle of reciprocity and 11 requests were forwarded under the international agreement entered into by Belarus. The largest number of requests was received from Germany – 8 requests or 34.8% of total number of incoming requests. Besides that, 5 requests were received from Lithuania, 4 requests from Latvia, 2 requests from Finland, 1 request from Bulgaria, 1 request from Greece, 1 request from Spain, and 1 request from Turkey. All incoming requests were approved for execution. However, 4 requests were not executed since persons to whom the documents should be handed over left the territory of Belarus (3 requests from Germany), and also because the witnesses refused to participate in the court proceedings (request from Latvia).

Case Study 1. In June 2021, funds in amount of Euro 253,692.21 were recovered and returned to Belarus following execution by the Spanish competent authorities of the international legal assistance request of the RB Supreme Court dated December 30, 2015 related to recognition and enforcement of the court order regarding confiscation of assets that had been obtained through crime by the convicted Belarusian citizen Mr.S and were located in Spain. The court found Mr.S guilty of bribe taking; repeated bribe taking in large amount; bribe taking in exceptionally large amount; and abuse of power.

96. All international legal assistance requests received for execution by Belarusian courts of general jurisdiction and forwarded by Belarus abroad are registered in the *International Legal Assistance* Section of the *Court Records* Sub-System of the CGJ AIS System. Requests related to money laundering and predicate offences are placed in a separate category.

Immediate Outcome 3 (moderate level of effectiveness)

97. Since November 20, 2020, monitoring of compliance by gambling operators with the AML/CFT legislation is conducted by all tax authorities, while until November 20, 2020, such monitoring was performed only by the Ministry of Taxes and Duties (MTD) (Law 165-Z, Art.15, Par.2).

98. Pursuant to Annex 4 to MTD Order 20 dated February 9, 2018 (as amended on July 1, 2019), which establishes separate risk assessment criteria in the gambling sector that are taken into account when selecting supervised entities for random inspections, the following additional ML/TF/PF risk assessment criteria are applied since July 1, 2019:

- Instances of imposition, within a calendar year, of administrative liability for breaches of the AML/CFT/CPF legislation during last two years;

- Failure to file special reporting forms on recorded transactions that are subject to special monitoring with the financial monitoring authorities during a calendar year;
 - Submission, during a calendar year, of special reporting forms on recorded transactions that are subject to special monitoring to the financial monitoring authorities only if amount of such transactions carried out by natural persons is equal to or exceeds 2,000 basic units.
99. In 2022, two gambling operators were selected for random inspections based, among other things, on the aforementioned criteria. Since January 1, 2019 through August 24, 2022, five persons were held administratively liable for breaches of the AML/CFT legislation, and the tax authorities identified, in cooperation with the law enforcement agencies, three instances of unlicensed gambling activities.
100. Following enactment of RB Presidential Decree No.305 *on Improvement of Legal Regulation of Gambling Business* dated August 7, 2018, operation of online casinos was legalized in Belarus since April 1, 2019. As of August 24, 2022, nine business entities were licensed to provide online gambling services, but in fact only seven online gambling organizers operate in Belarus. Monitoring of gambling operators is conducted in line with the legislation on licensing.
101. Besides that, monitoring of online casinos is performed by way of expert assessment of gambling sites conducted by the interagency commission composed of representatives of the Operations and Analysis Center under the RB President, the Ministry of Taxes and Duties and the Gambling Business Monitoring Center (hereinafter the Monitoring Center). The expert assessments are conducted for verifying compliance by online casinos with the requirements set out in the *Regulation on Requirements for Virtual Gambling Sites and Procedure of Expert Assessment of Compliance with these Requirements* adopted by RB Council of Ministers' Resolution No.139 dated March 1, 2019.
102. Since April 1, 2019, a total of seventeen expert assessments were conducted. Following expert assessment of virtual gambling sites by the Monitoring Center, operation of such sites is subject to continuous monitoring as part of the integration testing process. Since April 1, 2019 through August 24, 2022, a total of 60 such tests were conducted by the Monitoring Center. Besides that, distribution of information intended for organization and (or) operation of online gambling business in breach of the legislation governing gambling activities is prohibited in Belarus since April 1, 2021.
103. Since April 1, 2021, monitoring of information posted in the Internet is conducted for identifying websites that provide online gambling services in Belarus in breach of the RB legislation. Information of websites that are identified with the use of a special software and are subject to blocking is disseminated by the Monitoring Center to the Ministry of Taxes and Duties for taking further measures provided for RB Law No.427-Z on Mass Media dated July 17, 2008.
104. As of August 24, 2008, a total of 2,426 websites that contained information on organization and (or) operation of online gambling business in breach of the legislation governing gambling activities prohibited for distribution in Belarus were blocked in a manner prescribed by the law.
105. For establishing common approaches to ensuring compliance by gambling operators with the AML/CFT legislation, the exhaustive list of data that should be contained in the electronic copy of ID documents provided by online gamblers has been compiled. Besides that, it is further specified that identification of online gamblers is performed, *inter alia*, for AML/CFT purposes. Thus, in order to register a gambling account, an online gambler shall provide the gambling operator with the electronic copy of his/her ID document (scanned copy, photo copy or other digital copy clearly showing data contained therein) containing information on such online gambler provided for in Article 8(4) of Law 165-Z as well as his/her personal data required for verifying such information against the identification system.

106. For reducing a possibility of illegal withdrawal of funds from gambling accounts of gamblers and ensuring full compliance with the AML/CFT legislation, bonuses provided by gambling operators may be used by gamblers only for placing bets on virtual gambling sites.
107. Gambling operators are obliged to comply with the above listed requirements starting from June 25, 2022 (when Resolution 160 came into force).
108. Capabilities and functions of a special computerized cash register system that enables to monitor cash turnover in the gambling sector are further extended and improved. In particular, an analytical sub-system that allows for monitoring and overseeing compliance by gambling operators with the AML/CFT legislation has been integrated into the special computerized cash register system. This sub-system allows the oversight authorities to promptly obtain information on: ML/TF risk assessments conducted by gambling operators; high-risk customers of land-based gambling venues and virtual gambling sites; special reporting forms broken down by suspicious transactions indicators filed with the financial monitoring authorities; frozen customers' funds; suspended customers' transactions; confiscated customers' funds; self-assessments of risk of involvement in suspicious financial transactions conducted by gambling operators; and qualification and training of executive officers of gambling operators.
109. With a view to implementing additional measures to prevent criminals and their associates from being the owners (including beneficial owners) of and (or) holding management functions in legal entities operating gambling business, a register of beneficial owners of gambling operators has been created. Information on beneficial owners recorded in this register is broken down by the following categories of legal entities operating gambling business:
 - Legal entities established with participation of foreign legal and natural persons;
 - Legal entities established with participation of only legal and natural persons that are residents of the Republic of Belarus;
 - Legal entities established with participation of residents of offshore jurisdictions;
 - Legal entities whose senior management officials are identified as beneficial owners;
 - Legal entities whose shareholders/ members are only natural persons;
 - Legal entities whose shareholders/ members are both legal and natural persons.
110. Information on beneficial owners of gambling operators is cross-checked against information received from the law enforcement agencies and well as against information contained in the crime database and PEP database. At present, the efforts are undertaken by the Ministry of Taxes and Duties to integrate the register of beneficial owners of gambling operators with the databases used by the tax authorities.
111. Training in monitoring of gambling operators, including their compliance the AML/CFT legislation with the use of, *inter alia*, the special computerized cash register system, is provided to officers of the tax authorities on an annual basis (at least twice a year). For example, in 2021, such training of tax officers was conducted on October 25-29, and hands-on training workshop on the use of the special computerized cash register system, *inter alia*, for monitoring compliance by the gambling operators with the AML/CFT legislation was held on November 12. In 2022, such training events are scheduled for October - November.
112. In the first half of 2021, the Ministry of Taxes and Duties developed guidelines for AML/CFT monitoring of gambling operators (taking into account, *inter alia*, the requirements of FATF Recommendation 28 "*Regulation and Supervision of DNFBPs*") for conducting inspections of the supervised entities. Thus, AML/CT monitoring of gambling operators is currently conducted in line with these guidelines.

113. According to Article 11 of Law No.133-Z on State Registration of Real Estate Property, Titles thereto and Transactions therewith dated July 22, 2007 (hereinafter Law 133-Z), the government authorities responsible for state registration of real estate property, titles thereto and transactions include:
- Designated State Registration Authority subordinated to the Government of the Republic of Belarus (the State Property Committee);
 - National State Registration Agency;
 - Local state registration institutions (7 institutions).
114. The powers and responsibilities of the real estate property state registration institutions and their AML/CFT/CPF cooperation procedures are set out in Paragraphs 26-28 of Instruction 36. Article 13 of Law 133-Z provides that the National State Registration Agency conducts certification of real estate registrars and keeps a register of registrars.
115. Persons with a criminal record or engaged in entrepreneurial or intermediary activities, as well as those performing other paid work, other than teaching or scientific work, may not be admitted to the certification (Paragraph 8 of Regulation on Certification of Registrars adopted by Resolution 1 of the Committee on Land Resources, Geodesy and Cartography under the RB Council of Ministers dated January 21, 2003).
116. Certification of a real estate registrar is conducted before appointment to the position of registrar, as well as after five years from the date of previous certification, the main purpose of which is to verify the professional knowledge of registrars and the ability to apply such knowledge in practice. In particular, in 2019, 111 out of 120 real estate registrars (applicants for the position of registrar) were certified; in 2020 – 151 out of 158; in 2021 – 164 out of 169; and in the first half of 2022 – 128 out of 132. Statistics over the previous period: in 2016, 196 out of 202 real estate registrars (applicants for the position of registrar) were certified; in 2017 – 160 out of 166; and in 2018 – 176 out of 178.
117. State registration of real estate property, titles thereto and transactions therewith performed by registrars (directly involved in financial transactions) are subject to monitoring by the National State Registration Agency, one of the purposes of which is to prevent illegal actions (inactions) by registrars in the registration process. The procedure of such monitoring is set out in the Instruction on Procedure of Monitoring of Registration Process by the National State Registration Agency adopted by State Property Committee's Order No.364 dated November 14, 2011 (hereinafter Instruction 364).
118. The Commission established under the National State Registration Agency for reviewing the monitoring results (hereinafter the Commission) makes relevant decisions based on findings of the conducted monitoring. As provided for in Instruction 364, Par.19, if actions of a registrar are found to be contradictory to the law, the Commission may also pass an additional decision to seize the seal of such register and order him/her to undergo extraordinary certification. Thus, the register is deprived of the right to perform registration activities and carry out financial transactions, respectively.
119. Number of inspections (audits) conducted by the National State Registration Agency in the period under review: 143 inspections in 2019; 103 inspections in 2020; 116 inspections in 2021; and 62 inspections in 2022. Number of registrars ordered by the Commission to undergo extraordinary certification in the reviewed period: 7 registrars in 2019; 6 registrars in 2020; 3 registrars in 2021; 5 registrars in 2022.
120. Letter 2103 dated March 29, 2019 disseminated by the National State Registration Agency informed the local registration institutions that breaches by registrars of the AML/CFT legislation would be considered as erroneous actions significantly affecting assessment of such registrars. In the reviewed period, 4 registrars were ordered to undergo extraordinary certification as a result of the identified breaches of the AML/CFT legislation committed by them.

121. In view of the scope of registration activities and number of reported transactions that are subject to special monitoring, the on-site AML/CFT inspections of the head offices of local state registration institutions were conducted since August 2020 through March 2021 to verify practical knowledge of registrars. The inspectors requested registrars to complete specially developed questionnaires; analyzed the quality of special reporting forms submitted by registrars; and verified how registrars perform identification of parties to financial transactions in the process of state registration of real estate property. These on-site inspections also included AML/CFT training events (a total of 7 training events were held). Based on the inspection findings, the ratings were assigned to the local state registration institutions, and the letter with methodological guidelines was disseminated to them.
122. At present, the work is underway to analyze quality of special reporting forms and identification of parties to financial transactions by registrars of the head offices and all divisions of the local state registration institutions. It is planned that this project will be completed in the fourth quarter of 2022, after which a number of methodological events will be arranged, including the national AML/CFT workshop for local state registration institutions.
123. On May 13-14, 2021, the workshop on *“Pressing AML/CFT/CPF issues related government registration of real estate property, titles thereto and transactions therewith”* was held via videoconferencing at the Center of Professional Development Training of Managers and Specialists of the State Property Committee (hereinafter the SPC Training Center).
124. In the course of preparation for this event, information on the encountered internal control-related problems was requested from the local state registration institutions, and the relevant methodological guidelines and clarifications were provided to the workshop participants.
125. With a view to improving the effectiveness of internal controls applied by the local state registration institutions, the frequently asked questions concerning internal controls and analytical data on suspicious indicators indicated in special reporting forms by registrars in the course of carrying out financial transactions with real estate property (obtained from the Financial Monitoring Department) were considered and reviewed.
126. Given the scope of activities carried out by the particular reporting entity, number of reports on transactions that are subject to special monitoring filed by it and high ML/TF risks, two additional training events were held (at Minsk City Agency for State Registration and Land Cadastre).
127. In 2020, two national training workshops were held at the SPC Training Center for managers and specialists of the local state registration institutions responsible for AML/CTF training and cooperation with the Financial Monitoring Department. The topics covered included: number of special reporting forms filed with the FMD; pressing issues related to application of internal controls; and problems related to state registration of real estate property, titles thereto and transactions therewith, including breaches most frequently identified in the process of monitoring of registration activities.
128. On November 10 and 12-13, 2020, the training workshop on *“Legal, Regulatory and Operational Measures for Combating Money Laundering and Financing of International Terrorism”* was held via videoconferencing as part of implementation of the Twinning Project for *“Strengthening the Capacity for Geospatial Data Management and Interoperability of the National Cadastral Agency”*.
129. The delivered training course included exchange of practical AML/CFT experiences with the representatives of the Legal Department and Department of Customs and Special Taxes of the Spanish Customs Surveillance Service.
130. Taking part in the training workshop were the representatives of the Financial Monitoring Department, Belarusian Notarial Chamber, Local State Registration Institutions, Ministry of Taxes and Duties, Ministry of Justice and State Property Committee of Belarus.
131. In 2019, seven (7) on-site AML/CFT training events were held at the local state registration institutions for registrars involved in financial transactions with real estate property and lead specialists

- responsible for providing AML/CFT training, conducting internal audits and filing special reporting forms with the Financial Monitoring Department.
132. As part of implementation of the automated information system for keeping the single state register of real estate property, titles thereto and transactions therewith (#KA#ETZ AIS System), over 40 on-site workshops covering, among other things, such topics as identification of parties to financial transactions and recording of financial transactions that are subject to special monitoring with the use of this System, were held since 2019 through November 2021.
 133. In the reviewed period, representatives of the State Property Committee and the National State Registration Agency took part, jointly with the FMD officers, in 18 international training events, which included roundtables, training courses, online conferences and lectures, *inter alia*, with participation of foreign specialists (4 events in 2019, 2 event in 2020, 3 events in 2021, and 9 events in 2022).
 134. The AML/CFT lectures, that cover, *inter alia*, issues related to application of a risk-based approach, are delivered on a monthly basis for officers of the agencies and institutions responsible for state registration of real estate property, titles thereto and transactions therewith. Forty 2 (42) such events were held since March 2019 through August 2022.
 135. In the reviewed period, over 20 letters were disseminated with a view to providing methodological support to the operation of the state registration institutions. Since the second quarter of 2022, the practice has been introduced according to which the local state registration institutions are provided with quarterly analytical information on cooperation with the Financial Monitoring Department in terms of number of special reporting forms filed with the FMD broken down by local state registration institutions.
 136. For the purpose of conducting inspections and holding training events, the State Property Committee and its Departments as well as the National State Registration Agency have current and accurate statistical information on activities of the supervised entities retrieved from the #KA#ETZ AIS System against the pre-set criteria.
 137. With a view to implementing the automated inspection planning process and mitigating ML/TF risks related to transactions with real estate property, measures are undertaken to upgrade the #KA#ETZ AIS System used by registrars in the process of registration activities.
 138. RB Ministry of Justice's Order 67 dated June 3, 2019 introduced amendments and modifications in RB Ministry of Justice's Order 25 dated February 20, 2018 on Risk Assessment Criteria for Selecting Obligated Entities that are Subject to Random Inspections, that establishes the list of criteria for assessment of levels of risk for identifying the obliged entities in respect of whom random inspections are conducted. In particular, the following risk level assessment criteria and respective risks scores are established for conducting random AML/CFT inspections:
 - For notaries: (i) repeated (twice a year) breaches of the established customer questioning procedure provided for in the AML/CFT/CPF legislation (8 scores); (ii) repeated (twice a year) failure to submit a special reporting form to the financial monitoring agency (10 scores);
 - For lawyers, legal service providers and real estate companies – identified breaches by a license holder of the AML/CFT/CPF legislation within a year (10 scores); imposition of administrative liability on a license holder (its managers, personnel) for committing an administrative offence (10 scores).
 139. The risk level assessment criteria have been determined by the Ministry of Justice in coordination with the Interagency Oversight (Supervision) Council based on methodology for development of a risk level assessment system adopted by RB Council of Ministers' Resolution No.43 dated January 22, 2018.

140. Information on compliance by notaries with the AML/CFT/CPF legislation is provided by the Belarusian Notarial Chamber to the Ministry of Justice using the standard forms approved by the Resolution of the Ministry of Justice. Information on breaches of the AML/CFT legislation identified in bank inspection reports is sorted by types of detected violations in a tabular form. The list of reference codes and types of violations is reviewed for adequacy at least one a year. In the review process, newly identified typologies are added to the list, while obsolete typologies are deleted from it.

Immediate Outcome 4 (moderate level of effectiveness)

141. Statistics on number of special reporting forms completed and filed by Belpost with the financial monitoring agency: 63 special reporting forms were submitted in 2021. It should be noted that 84.9 million postal transfers with total value of BYR 250,206.9 were received in 2021, where the average amount of one postal transfer was equal to BYR 2,527.05.

142. In 2022, the financial monitoring agency received 861 special reporting forms related to incoming international postal transfers with suspicious indicator 154 “*series of financial transactions, each of which is not suspicious, but in aggregate they raise suspicions of being carried out for tax (duties) evasion purposes*”.

143. The following suspicious indicators triggered submission of special reporting forms to the financial monitoring agency:

- A party of a financial transaction is a designated natural person included in the list of entities and natural persons linked to terrorist activities;
- A series of postal transfers sent to different recipients are paid out to one person acting by proxy;
- A financial transaction is inconsistent with the activities (business profile) of the party to such transaction;
- The amount of a postal transfer sent/received by a natural person is equal to or exceeds 2,000 basic units.

144. Since November 20, 2020, RB Council of Ministers’ Resolution No.662 dated November 19, 2020 on Amendments to RB Council of Ministers’ Resolution 367 dated March 16, 2006 established a new suspicious financial transaction indicator for the gambling sector (a party to a financial transaction keeps funds in the gambling account opened with a virtual gambling site without actual participation in gambling), and also revised and clarified some other suspicious financial indicators used earlier by gambling operators.

145. Measures have been taken to improve and extend the capability and functions of the special computerized cash register system for making it more convenient for use by gambling operators (*inter alia*, taking into account their suggestions). In particular:

- An additional function has been implemented for automated completion of a standard customer file based on personal data contained in the scanned copy of his/her ID document;
- The extended customer file has been updated for bringing it in line with the revised AML/CFT legislation;
- New functions have been implemented that enable users (i.e. gambling operators) to keep a register of financial transactions that are subject to special monitoring, a register of not reported transactions and a register of AML/CFT training and testing of personnel;

- The “black” and “grey” lists of countries as well as the list of offshore jurisdictions have been uploaded into the special computerized cash register system for automated identification of high-risk customers;
 - New standard forms have been adopted for completion by gambling operators based on the outcomes of conducted ML/TF risk assessments.
146. Training of gambling operators’ personnel in the use of existing and new functions the special computerized cash register system and AML/CFT consultations are conducted on a regular basis at the Gambling Business Monitoring Center. Since March 1, 2019 through August 24, 2022, training and consultations were delivered to 314 gambling operators’ personnel.
147. In the first half of 2021, the Ministry of Taxes and Duties (MTD) developed the ML/TF risk management guidelines and disseminated them to gambling operators. On August 31, 2021, the AML/CFT workshop on application of AML/CFT measures was held for gambling operators. The participants of the workshop (which was also attended by the representatives of the RB National Bank, the Financial Monitoring Department and the Ministry of Communications) considered and discussed, among other things, issued related to practical application of the guidelines developed by the MTD.
148. Thus, the ML/TF risk management procedures are being currently developed and implemented by gambling operators with due consideration for the MTD guidelines.
149. All state registration institutions have appointed the internal control compliance officers from among their senior managers. The state registration institutions implement internal controls at all stages of financial transactions. The internal controls applied by state registration institutions include, in particular, the following:
- Identifying and documenting financial transactions that are subject to special monitoring and submitting the relevant information to the financial monitoring agency;
 - Identifying parties to financial transactions in situations provided for in the legislation;
 - Applying measures for freezing funds and (or) suspending financial transactions in situations specified in Article 9-1 of Law 165-Z.
150. The state registration institutions have current and full information about ML/TF risks and understand their AML/CFT obligations. In the period under review, the following number of applications for state registration of real estate property was recorded: In 2019 - 783,332 applications; in 2020 - 824,179 applications; in 2021 - 913,621 application; and in 2022 – 599,753 applications, of which the following number of applications were related to registration of transactions with real estate property: in 2019 - 180,459 applications; in 2020 - 172,901 applications; in 2021- 187,674 applications; and in 2022 – 123,017 applications. In the reviewed period, the following number of registration applications was rejected: in 2019 – 11,276 denials; in 2020 – 10,767 denials; in 2021 -11,745; and in 2022 - 7,459, of which the following number of applications for state registration of transactions with real estate property was rejected: in 2019 – 940 applications; in 2020 – 875 applications; in 2021 – 828 applications; and in 2022 – 599 applications. In 2019-2022, there were six (6) instances when registrars refused to carry out financial transactions for customers due to failure by the customers to provide information and documents required for identification.
151. In the reviewed period, the following number of reports on transactions that are subject to special monitoring was filed: in 2019 – 71,769 reports; in 2020 - 60,562 reports; in 2021 – 66,060 reports; and in (the first half of) 2022 - 29,945 reports. The share of special reporting forms with indicators of suspicious transactions of total number of filed reports accounted for: 53.7% in 2019; 54.1% in 2020; 59.1% in 2021; and 64.1% in (the first half) of 2022. In 2017-2019, this share accounted for 4.9 % and 17.2 %, respectfully.

152. The statistics on cooperation with the Financial Monitoring Department in terms of number of submitted special reporting forms broken down by structural divisions of local state registration institution is collected, processed and reported on a regular (monthly) basis. Since the second quarter of 2022, the practice has been introduced according to which the local state registration institutions are provided with quarterly analytical information on cooperation with the Financial Monitoring Department in terms of number of special reporting forms filed with the FMD broken down by local state registration institutions.
153. Local state registration institutions conduct internal audits aimed at ensuring compliance with the procedure of documenting financial transactions that are subject to special monitoring. Such internal audits are conducted both in respect of registrars and based on certain criteria. Types of internal audits are determined independently by the state registration institutions and cover all specialists involved in financial transactions in all structural divisions. The following number of breaches was identified in the course of internal audits: in 2019 – 1,087 breaches; in 2020 – 513 breaches; in 2021 – 479 breaches; and in 2022 – 65 breaches.
154. The resources allocated for conducting internal audits are consistent with the nature of activities and ML/TF risks of local state registration institutions. Statistics on number of officers responsible for conducting inspections/ audits of state registration institutions: in 2019 – 50 officers; in 2020 – 51 officers; in 2021 – 65 officers; and in 2022 - 62 officers.
155. The statistics on sanctions imposed by local state registration institutions also demonstrates adequate application of response measures upon identification of breaches by executive officers of procedures set out in the legislation and internal control rules. Number of sanctions imposed by local state registration institutions based on the inspection/audit findings: 170 sanctions imposed in 2019; 440 sanctions imposed in 2020; 291 sanctions imposed in 2021; and 73 sanctions imposed in 2022.
156. The response measures include primarily reduction (deprivation) of bonuses payable to staff members, and, to a lesser extent, admonition/ reprimand. The decreasing number of committed breaches demonstrates that the imposed sanctions are proportionate and dissuasive. Besides that, training is conducted for improving quality of reports on financial transactions that are subject to special monitoring. Frequency of such training events is determined by the internal regulations of local state registration institutions (but shall be provided at least one in three years).
157. The Ministry of Justice implements the Action Plan (approved by the Minister of Justice's Order dated February 27, 2019) aimed at using the results of national ML/TF risk assessment, mitigating risks and improving the effectiveness of the national AML/CFT system within its realm.
158. The Ministry of Justice, Justice Departments of the Regional Executive Committees, the Belarusian Notarial Chamber and local chambers of notaries hold meetings, roundtables and AML/CFT training events for notaries covering such topics as: beneficial ownership; compliance with the statutory requirements related to identification of parties to financial transactions and beneficial owners of customers; completion of special forms for reporting financial transactions that are subject to special monitoring; imposition of targeted financial sanctions; implementation of internal controls; prevention of risks in professional notarial activities, etc.
159. On December 18, 2020, the online (remote) training web portal for non-credit financial institutions was launched in Belarus. The National Bank analyzes the incoming reports of a quarterly basis and uses the findings of such analysis to conduct outreach and provide guidelines and instructions to non-credit financial institutions.

Immediate Outcome 5 (low level of effectiveness)

160. According to the Action Plan Aimed at Eliminating Deficiencies of the National AML/CFT System in 2022-2023 approved by Minutes 2 of the Interagency Commission Meeting dated April 28, 2022 (hereinafter the Action Plan), the Methodology of the ML/TF National Risk Assessment will be updated to include a new section related to legal entities and NPO sector. Besides that, the TF Risk Mitigation

Action Plan for 2022-2023 (approved by the same Minutes) provides for a range of measures aimed at assessing risks of abuse of non-profit organizations for terrorist financing purposes. It is planned that a comprehensive assessment of ML/TF vulnerabilities of legal entities will be conducted in the course of the next round of NRA.

161. On August 9 – 11, 2022, the International Workshop on Assessment of Risks on NPO Sector was held in Minsk city with the support of the International Training and Methodology Centre for Financial Monitoring. Taking part in the workshop were the representatives of the NPO sector and interested government authorities, including the Ministry of Justice.

162. The Ministry of Justice has drafted the RB Law on State Registration and Liquidation (Termination of Activities) of Business Entities, which includes, *inter alia*, the provisions requiring that the Single State Register of Legal Entities and Individual Entrepreneurs (hereinafter the SSR) shall necessarily contain current information on founders (shareholders/ members) of legal entities (the development of this draft law is provided for in paragraph 4 of the Action Plan). In particular, the draft Law provides for:

- Reduction of a time period for making modifications in a charter and their submission for state registration in the event of change of ownership of the property or changes in the list of the company's shareholders/ members (except for joint stock companies, condominiums, consumer cooperatives, horticultural partnerships, associations (unions), state associations and chambers of commerce and industry). The time period is reduced from two months to fifteen business days from the date of such modifications;
- Reduction of a time period for notification about change of location and appointment (replacement) of director of a company. The time period is reduced from ten to five business days;
- Introduction of intermediation by notaries in the event of changes in the list of members of limited liability companies or additional liability companies as a result of secession of a member from the company. A secession application will be submitted not to a company, but to a notary who will notify the registration authority thereof, and the registration authority, in turn, will make entry about changes in the list of the company's members in the Single State Register.

163. At present, the draft Law is submitted to the RB Government for review. Besides that, another mechanism for obtaining information on beneficial owners of legal entities has been implemented in Belarus.

Immediate Outcome 6 (substantial level of effectiveness)

Table 1: Information on the Work Conducted by the Financial Monitoring Department since 2020 through the first half of 2022

No.	Performance Indicators	2020	2021	2022 (first half)
1.	Number of received reports on transactions that are subject to special monitoring (special reporting forms):	151,780	159,489	94,010
2.	Number of disseminated reports, including:	1,803	1,684	642
	– at request	1,035	1,021	383
	– spontaneously	768	663	259
2.1	To the Financial Investigation Department, including:	450	468	191
	– at request	234	227	88
2.2	To the Prosecution Authorities, including:			


	– at request			
2.3	To the Investigative Committee, including:	56	89	26
	– at request	56	89	26
2.4	To the State Security Committee, including:	140	197	90
	– at request	70	65	17
2.5	To the Ministry of Internal Affairs, including:	527	532	202
	– at request	450	484	176
2.6	To foreign FIUs, including:	448	246	72
	– at request	173	104	41
2.7	To the Ministry of Taxes and Duties, including:	5		0
	– at request	3		0
2.8	To the State Customs Committee departments and units, including:	120	104	38
	– at request	25	25	12
2.9	To other interested government authorities, including:	57	48	23
	– at request	24	27	23
3.	Amount of administrative sanctions imposed by law enforcement and oversight authorities and additionally charged taxes based on FMD disseminations (USD), including:	55,310,277	78,863,057	41,385,143
	- based on FMD spontaneous disseminations	1,222,259	15,047,766	12,955,445
4.	Amount of funds recovered, prevented from misappropriation and forfeited to the State budget by law enforcement and oversight authorities based on FMD disseminations (USD), including:	57,610,058	60,368,052	26,364,858
	- based on FMD spontaneous disseminations	8,591,520	17,321,167	1,325,426
5.	Number of criminal offences detected by law enforcement authorities based on FMD disseminations, including:	327	208	183
	- based on FMD spontaneous disseminations	21	54	19

Table 2: Information on Criminal Offences Detected by Law Enforcement Agencies Based of FMD Disseminations (2020 – 1st half of 2022)

Art. No ³	Criminal Offence	2020	2021	2022
130	Incitement to hatred or discord			1
166	Rape		1	
167	Sexual assault		1	
171	Exploitation and (or) facilitation of prostitution	1	1	
205	Theft	1	1	
209	Fraud	25	15	69
210	Embezzlement through abuse of office	29	14	10
211	Misappropriation or embezzlement			2

3

 Medium level of risk according to the 2018 NRA findings

 High level of risk according to the 2018 NRA findings

212	Embezzlement through misuse of computer equipment	1	2	
216	Infliction of material losses by way other than embezzlement	1	3	4
225	Non-return of foreign exchange from abroad	8		
228	Smuggling		1	1
231	Evasion of payment of customs duties	1	2	1
234	Fake business activities (operation of shell companies)	1		
235	Legalization (laundering) of funds obtained through crime	5	13	5
237	Fraudulent receipt (luring) of loan or subsidy	8		
240	Intentional insolvency (bankruptcy)		5	
241	Prevention of compensation of losses to creditor(s)		1	
242	Evasion of loan repayment		2	1
243	Tax evasion	71	71	29
285	Establishment of a criminal organization or membership in such organization			2
306	Breach of labor safety regulations	1		
328	Illicit trafficking of narcotic drugs, psychotropic substances, their precursors and similar substances	4		8
342	Arrangement and preparation of or active participation in actions that grossly violate public order			1
343	Production and distribution of pornography			1
343-1	Production and distribution of child pornography			1
361	Calls for actions that harm national security of Belarus		3	2
363	Resistance to a police officer or other officer responsible for maintaining public order			1
371	Illegal crossing of the state border of Belarus			1
380	Illegal acquisition or sale of official documents	1		1
424	Abuse of power or office	15	11	8
425	Inaction by executive officer	1		
426	Ultra Vires Act	15	4	2
427	Official forgery	5	1	2
428	Neglect of duty	3		
430	Bribe taking	88	29	7
431	Bribe giving	13	9	7
432	Intermediation in bribery			1
433	Acceptance (receipt) of illegal remuneration	6	4	1
	Other	23	14	14
	TOTAL	327	208	183

Immediate Outcome 7 (moderate level of effectiveness)

164. In order to improve the efforts of the government authorities aimed at identifying proceeds obtained through crime or bribery and determining amount of such proceeds, detecting instances of legalization (laundering) of criminal proceeds, analyzing transactions carried out by legal entities and natural persons and locating criminal proceeds and assets, the Methodological Guidelines for Identification and Location of Proceeds Obtained through Crime or Bribery were adopted by Interagency Resolution No.ts16013/2/64/10/159/27/26/2/a7 of the General Prosecutor's Office, the Investigative Committee, the State Control Committee, the State Border Committee, the State Customs Committee, the State

Security Committee, the Ministry of Internal Affairs, the Ministry of Defense, the Ministry of Taxes and Duties, the Operations and Analysis Center under the RB President and the RB Presidential Security Service dated June 30, 2022.

165. These Guidelines set out in detail the procedure of verification of financial status of persons both in the course of pretrial investigations and without initiating criminal proceedings and the mechanisms of cooperation and coordination among operational agencies, inquiry agencies, preliminary investigation agencies, prosecution authorities and tax authorities for establishing facts of receipt of criminal proceeds, assessing amount of such proceeds, determining circumstances indicating legalization (laundering) of criminal proceeds, analyzing potentially suspicious financial transactions, identifying assets that are subject to seizure and instrumentalities of crime, identifying natural persons who assist in disposal or legalization (laundering) of criminal proceeds and identifying legal entities used for money laundering purposes.
166. According to the Interior Ministry statistics, 54 criminal proceedings were initiated under Article 235 (money laundering) of the Criminal Code and 23 persons were convicted by courts under this Article in the period from 2019 through the first half of 2022.

Case Study 2. The Ukrainian citizen Mrs. Yu and the Russian citizen Mr. G joined the organized criminal group operated in the territory of Russia, Ukraine, Kazakhstan, Armenia, Moldova, Azerbaijan, Uzbekistan, Latvia and Belarus since 2014 through February 23, 2018..

Using the forged Russian passports, Mrs. Yu and Mr. M took part in establishing several legal entities in Belarus. The members of the organized criminal group used POS terminals and bank payment cards (including forged ones) and uploaded knowingly false information in the computer system to steal funds of unidentified persons, as a result of which the issuing banks suffered exceptionally large losses. The stolen funds were transferred to bank accounts of the legal entities established by the organized criminal group and subsequently laundered by way of transferring them under false pretenses to accounts of foreign legal entities including legal entities registered in offshore zones (British Virgin Islands) and shell companies (Kazakhstan), opened with foreign banks (Latvia, Kazakhstan). The amount of laundered funds was equal to USD 3.5 million.

The court found Mrs. Yu and Mr. G guilty of committing criminal offences covered by Art.209, Par.4 (fraud in exceptionally large scale by organized group), Art, 14. Par.1 and Art.212, Par.4 (attempted theft of assets in exceptionally large amount by modification of computer information by organized group), Art.235, Par.3 (money laundering by organized group) and Art.380, Par.2 (use of forged documents) of the Criminal Code.

Mrs. Yu and Mr. G were sentenced on multiple counts to 6 years of imprisonment (each) with deprivation of the right carry out activities involving access to secure information systems for 5 years. Mrs. Yu will serve the sentence in medium security prison, while Mr.G will serve the sentence in maximum security prison.

Case Study 3. Individual B was found by the court guilty of bribe taking in exceptionally large amount by organized group and money laundering in exceptionally large amount and sentenced for multiple crimes covered by Art.430, Par.3 and Art.235, Par.2 of the Criminal Code to imprisonment for 14 years in maximum security prison and fine in amount of 5 thousand basic units (BYR 145,000) with deprivation of the right to hold administrative and management functions for 5 years. The court established that individual B, being the executive officer, created and led the organized criminal group, composed of executive officers of company B, that repeatedly took bribes for making favorable decisions within their purview and awarding and executing contracts through abuse of their power in favor of bribe givers between company B and different Belarusian business entities from January 1, 2004 through June 11, 2020. During the period when individual B was the leader of this organized criminal group, he received, for himself and his family members, bribes in US dollars, Euros and Belarusian Rubles in total amount exceeding BYR 30 million (as per the exchange rate of the RB National Bank). In order to give the appearance of legitimate ownership, use and disposal of funds and re-integrate them into legitimate economy, individual B carried out a number of financial transactions (entered into fake loan agreements, transferred funds disguised loan repayment, acquired the real estate property in Minsk city and registered the title thereto in the name of the legal entity controlled by him). Thus, individual B laundered criminal proceeds in exceptionally large amount of BYR 1.1 million.

Immediate Outcome 8 (moderate level of effectiveness)

167. In order to maintain statistical records in line with the requirements set out in the FATF Recommendations, the internal regulations of the RB General Prosecutor require prosecution authorities to keep records of number of criminal cases where the special confiscation procedure is applied (i.e. forced forfeiture for the benefit of the State of assets obtained through crime or acquired with funds obtained through crime; proceeds derived from the use of such assets and items related to the committed crime that are not subject to return to victims or third parties; instrumentalities of crime; seized items withdrawn from circulation; and assets of equivalent value). According to the statistical report of the prosecution authorities, the special confiscation procedure was applied in 2,132 criminal proceedings in 2019; in 2,312 criminal proceedings in 2020; in 3,034 criminal proceedings in 2021; and in 1,796 criminal proceedings in the first half of 2022.
168. Since 2021, the prosecution authorities also keep records of convicted persons whose assets obtained through crime, proceeds derived from the use of such assets or assets of equivalent value are confiscated with indication of amount of funds subject to forfeiture. This type of special confiscation procedure was applied by courts in respect of assets of 276 convicted persons amounting to BYR 76.7 million in 2021, and in respect of assets of 304 convicted persons amounting to BYR 4.7 million in the first half of 2022.

Immediate Outcome 9 (substantial level of effectiveness)

Case Study 4. The criminal intelligence gathered by the State Security Committee revealed that, with a view to financing terrorist activities and providing other support to the ISIL terrorists, the Belarusian citizen Mr. S, who stayed in Minsk city and was the adherent of the ISIL ideology, publicly posted the call for providing material support to the ISIL on the personal page created by him in the Classmates social media on October 11, 2018 and also corresponded with unidentified persons (who used network nicknames) with the aim of collecting funds and other assets to be used for providing material support to the ISIL terrorists and carrying out terrorist activities.

On August 28 and November 9, 2018, with a view to financing terrorist activities and providing other support to the ISIL terrorists, individual B communicated, via Telegram App, the Belarusian mobile subscriber identification number registered in his name to the ISIL terrorist (the Kyrgyz citizen S)

required by the latter for registration of Whatsapp and Facebook accounts, along with the account activation codes, and paid in advance for telecommunication services for a period of 179 days.

On November 11, 2018, the telecommunication services needed for registration of Classmates accounts were provided (paid) by individual S for another ISIL terrorist (the Tajik citizen M).

Thus, the terrorist financing methods included:

- preparation for public collection of funds in the Internet (without concealment of TF purpose);
- provision of telecommunication services for terrorists paid up from legitimate sources (wages of the suspect).

In the course of criminal investigation, mutual assistance reports (for information and investigative and procedural actions) were sent to the competent law enforcement authorities of Russia, Kyrgyzstan and Tajikistan for establishing the circumstances to be further proved in court.

The actions committed by individual S constituted, among other things, preparation for financing of terrorist activities (CC Art.13 and Art.290-1, Par.2) and repeated financing of terrorist activities (CC Art.290-1, Par.2).

The court found individual S guilty of committing criminal offences covered by Art.130, Par.1, Art.290-4, Par.2, Art.14, Art.290-2, Par.1, Art.290-1, Par.2, Art.13 and Art.290-1, Par.2 of the Criminal Code and sentenced him on multiple counts to imprisonment for 10 years and 6 months in maximum security prison.

Immediate Outcome 10 (moderate level of effectiveness) and Immediate Outcome 11 (substantial level of effectiveness)

169. Since 2020 through August 2022, thirty six (36) workshops/ meetings/ events on AML/CFT issues, including on application of TFS, were held in cooperation with the relevant associations for:

- Banking sector (27 events);
- Leasing sector (5 events);
- Forex sector (1 event);
- High-Tech Park residents (2 events);
- Gambling sector (1 event).

170. Training materials on the aforementioned topics are regulatory posted on the online (remote) training portal created on the NB Training Center website for non-credit financial institutions (microfinance organizations, leasing companies, forex companies), and training of managers and personnel of non-credit financial institutions is subject to continuous monitoring.

ANNEX I

#	Titles of Laws and Regulations	Scope
1.	Law No.14-Z dated May 13, 2020 on Amendments to Law on Measures Aimed at Prevention of Legalization of Criminal Proceeds, Financing of Terrorist Activities and Financing of Proliferation of Weapons of Mass Destruction (Law 165-Z)	R.1, R.8, R.10, R.15, R.16, R.18 IO.3, IO.4
2.	Decree of the President dated May 25, 2021 № 196 "On online borrowing services and leasing activities" (together with the "Regulations on the operation of an online borrowing service operator and contracts concluded through this service")	R.26
3.	Decree of the President dated July 6, 2021 № 260 "On persons carrying out financial transactions"	R.26
4.	Ministry of Justice (MoJ) Resolution No.153-1 dated October 30, 2020 on Information about activities of Public Associations and Foundations (Resolution 153-1)	R.8
5.	MoJ Resolution No.209 dated December 7, 2021 "On amendments to Resolution No. 153-1 of the Ministry of Justice of the Republic of Belarus of October 30, 2020".	R.8
6.	RB National Bank Board Resolution No.366 dated November 19, 2020 on Amendments to Instruction No.494 on Requirements for Anti-Money Laundering, Counter-Terrorist Financing and Counter-Proliferation Financing Internal Control Rules of Entities Engaged in Financial Transactions adopted by the RB National Bank Board Resolution dated September 19, 2016 (Instruction 494)	R.10, R.18
7.	MoJ Resolution No.159 dated November 3, 2020 on Amendments to the Instruction on Requirements for Internal Control Rules of Notaries adopted by MoJ Resolution No.184 dated October 4, 2016 (Instruction 184)	R.10, R.15, R.22
8.	MoJ Resolution No.184 dated September 30, 2021 on Amendments to the Instruction on Requirements for Internal Control Rules of Real Estate Companies, Corporate and Individual Legal Service Providers and Lawyers adopted by MoJ Resolution No.183 dated October 4, 2016 (Instruction 183)	R.10, R.15
9.	MoJ Resolution No.160 dated November 3, 2020 on Amendments to Money Laundering, Terrorist Financing and Proliferation Financing Risk Management Guidelines for Notaries adopted by MoJ Resolution No.186 dated October 10, 2016 (Guidelines 186)	R.10
10.	MoJ Resolution No.184 dated October 30, 2021 on Amendments to Money Laundering, Terrorist Financing and Proliferation Financing Risk Management Guidelines for Real Estate Companies, Corporate and Individual Legal Service Providers, Lawyers and Law Firms adopted by MoJ Resolution No.185 dated October 4, 2016 (Guidelines 185_	R.10
11.	RB National Bank Board Resolution No.367 dated November 19, 2020 on Amendments to Instruction No.818 on Requirements for Anti-Money Laundering, Counter-Terrorist Financing and Counter-Proliferation Financing Internal Control Rules Applicable to Banking Transactions adopted by the RB National Bank Board Resolution dated December 24, 2014 (Instruction 818)	R.13, R.16, R.18

12.	RB National Bank Board Resolution No.81 dated March 31, 2021 on Amendments to the Money Laundering, Terrorist Financing and Proliferation Financing Risk Management Guidelines adopted by RB National Bank Board Resolution No.783 dated December 17, 2014 (Guidelines 783)	R.17
13.	Ministry of Finance (MoF) Resolution No.96 dated November 4, 2016 (as amended on October 30, 2020) on Requirements for Internal Control Rules (Resolution 96).	R.22
14.	Ministry of Taxes and Duties (MTD) Resolution No.17 dated November 19, 2020 on Amendments to the Instruction on Requirement for Internal Control Rules of Gambling Operators adopted by MTD Resolution No.27 dated September 16, 2016 (Instruction 27)	R.22
15.	RB State Property Committee (SPC) Resolution No.24 dated November 17, 2020 on Amendments to Instruction No.36 on Requirements for Internal Control Rules of Institutions Responsible for State Registration of Real Estate Property, Titles thereto and Transactions therewith adopted by the SPC Resolution dated December 31, 2014 (Instruction 36)	R.1, R.15, R.22
16.	MoJ Order No.67 dated June 3, 2019 on Amendments to MoJ order No.25 dated February 20, 2018 on Risk Assessment Criteria for Selecting Obligated Entities that are Subject to Random Inspections (Order 25)	R.22
17.	RB General Prosecutors' Order No.6 dated February 28, 2019 on Arrangement of Prosecutor's Supervision of Compliance with the Anti-Money Laundering, Counter-Terrorist Financing and Counter-Proliferation Financing Legislation (Order 6)	R.37, R.38, R.39
18.	RB Council of Ministers' Resolution No.569 dated October 8, 2021 on Amendments to Instruction No.367 on Procedure of Completion, Submission, Registration, Accounting and Keeping of Special Reporting Forms Intended for Recording Financial Transactions that are Subject to Special Monitoring adopted by the RB Council of Ministers' Resolution dated March 16, 2006 (Instruction 367)	R.1 IO.4
19.	RB Presidential Decree No.8 dated December 21, 2017 on Development of Digital Economy as amended by RB Presidential Decree No.1 dated March 18, 2021 (Decree 8)	R.15
20.	RB Presidential Decree No.48 dated February 14, 2022 on Register of Addresses (Identifiers) of Virtual Wallets and Specificities of Cryptocurrency Turnover (Decree 48)	R.15
21.	Regulation on Requirements for Internal Control Rules of Residents of the High-Tech Park adopted by the resolution of the High-Tech Park Supervisory Board dated October 23, 2018 (as amended by the resolution of the High-Tech Park Supervisory Board dated August 18, 2022) (Regulation on HTP Internal Control Rules)	R.15
22.	RB Law No.164-Z on Payment Systems dated April 19, 2022 (Law 164-Z)	R.28
23.	RB Council of Ministers' Resolution No.569 dated October 8, 2021 on Amendments to Instruction No.367 on Procedure of Completion, Submission, Registration, Accounting and Keeping of Special Reporting Forms Intended for Recording Financial Transactions that are Subject to	R.1 IO.1, IO.4

	Special Monitoring adopted by the RB Council of Ministers' Resolution dated March 16, 2006 (Instruction 367)	
24.	Resolution No. 1249 of the Council of Ministers of the Republic of Belarus dated December 24, 2014 "On Establishing General Requirements for Internal Control Regulations" (Resolution 1249)	R.1, IO.1
25.	MoJ Resolution No.159 dated November 3, 2020 on Amendments to the Instruction on Requirements for Internal Control Rules of Notaries adopted by MoJ Resolution No.184 dated October 4, 2016 (Instruction 184)	R.13
26.	Finance Ministry Resolution No.96 dated November 4, 2016 on Requirements for Internal Control Rules, as amended on October 30, 2020 (Resolution 96)	R.22
27.	Resolution No.36 of the RB Ministry of Antimonopoly Regulations dated October 20, 2016 on Requirements for Internal Control Rules, as amended by Resolution No.67 dated October 28, 2020 (Resolution 36)	R.22
28.	RB National Bank Board Resolution No.366 dated November 19, 2020 on Amendments to Instruction No.494 on Requirements for AML/CFT/CPF Internal Control Rules of Entities Engaged in Financial Transactions adopted by the RB National Bank Board Resolution dated September 19, 2016 (Instruction 494)	R.10, R.18 IO.4
29.	RB National Bank Board Resolutions No.220 dated May 16, 2019, No.116 dated April 13, 2020 and No.222 dated August 3, 2021 on Amendments to RB National Bank Board Resolution No.82 dated February 28, 2018 On Adoption of Risk Assessment Criteria (Resolution 82)	IO.3
30.	RB National Bank Board Resolution No.296 dated October 18, 2021 on Establishing Requirements for Executive Officers and other Staff Members of Leasing Companies (Resolution 296)	R.10, IO.4
31.	RB National Bank Board Resolution No.347 dated November 19, 2021 on Establishing Requirements for Executive Officers and other Staff Members of Online Lending Service Operators and on Register of Online Lending Service Operators (Resolution 347)	R.10, IO.4
32.	RB National Bank Board Resolution No.85 dated February 24, 2022 on Amendments to the Guidelines on Methodology of Inspection and Monitoring of Forex Companies, Leasing Companies, Microfinance and Specialized Organizations by the National Bank adopted by RB National Bank Board Resolution No.166 dated April 9, 2018 (Guidelines 166)	IO.3
33.	RB National Bank Board Resolution No.5 dated January 5, 2022 on Amendments to the Guidelines on Inspections Conducted by the National Bank adopted by RB National Bank Board Resolution No.397 dated September 30, 2019 (Guidelines 397)	IO.3