



**GUIDANCE NOTES ON PROLIFERATION
AND PROLIFERATION FINANCING**

Table of Contents

1. DEFINITION OF KEY TERMS	3
2. INTRODUCTION.....	6
3. SCOPE OF THE GUIDELINES.....	8
4. APPLICABILITY	9
5. PROLIFERATION AND PROLIFERATION FINANCING	10
7. INDICATORS OF POSSIBLE PROLIFERATION FINANCING	15
8. HOW PROLIFERATION FINANCING DIFFERS FROM MONEY LAUNDERING.....	16
9. COMPARISON OF PROLIFERATION FINANCING TO MONEY LAUNDERING AND TERRORIST FINANCING	17
10. RISKS ASSOCIATED WITH PROLIFERATION FINANCING	18
11. MITIGATING PROLIFERATION FINANCING RISKS.....	20
12. THE FATF WORKING GROUP ON TERRORIST FINANCING AND MONEY LAUNDERING (WGTM)	23
13. CONCLUSION.....	24

1. DEFINITION OF KEY TERMS

Applicable resolutions: means the current United Nations Security Council Resolutions and future successor Resolutions related to combating and preventing terrorism, terrorist financing or the proliferation of weapons of mass destruction issued under Chapter VII of the United Nations Charter, including but not limited to the following Resolutions —

- a) Resolution 1267 of 1999;
- b) Resolution 1373 of 2001;
- c) Resolution 2253 of 2015;
- d) Resolution 1718 of 2006;
- e) Resolution 1874 of 2009;
- f) Resolution 2087 of 2013;
- g) Resolution 2094 of 2013;
- h) Resolution 2231 of 2015;
- i) Resolution 2270 of 2016;
- j) Resolution 2321 of 2016; and
- k) Resolution 2356 of 2017;

Business relationship: means any arrangement made between a Customer and a Specified Party or accountable institution where the purpose or effect of the arrangement is to facilitate an occasional, frequent, habitual or regular course of dealing between the person or legal arrangement and the Specified Party or accountable institution where payment to be made is not known or capable of being ascertained at the time of the conclusion of the arrangement.

Casino: means premises on which gambling is conducted and in respect of which a licence has been granted.

Committee: means the National Counter-Terrorism Committee established under section 12A of the Act

Designated person: means any person, entity or group that has been designated by a competent United Nations body as a person, entity or group against whom member states must take action for the prevention and combating of any activity specified in the applicable resolution.

Financial Action Task Force (FATF): means an independent inter-governmental body that develops and promotes policies to protect the global financial system against Money Laundering, terrorist financing and the financing of proliferation of weapons of mass destruction. The FATF Recommendations are recognised as the global Anti-Money Laundering (AML) and Counter- Terrorist Financing (CFT) standard.

Money Laundering: a person who engages in a transaction that involves property which is , or in part directly or indirectly represents the proceeds of any crime; or receives, is in possession of, conceals, disguises, transfers, converts, disposes of, removes from or brings into Botswana any property which, in whole or part directly or indirectly represents, the proceeds of any crime, where he or she knows, suspects or has reasonable grounds for knowing, or suspecting that the property is derived or realised, in whole or in part, directly or indirectly from any confiscation offence or serious crime related activity, shall be guilty of the offence of money laundering.

Proliferation: means the manufacture, acquisition, possession, development, export, transshipment, brokering, transport, transfer, stockpiling or use of any arms of war or NBC weapons in contravention of the Arms and Ammunition Act, Nuclear Weapons (Prohibition) Act, Biological and Toxin Weapons (Prohibition) Act, or Chemical Weapons (Prohibition) Act.

Proliferation Financing: Shall bear the same meaning as defined in the;

- a) Chemical Weapons Prohibition Act 2018, which means the act of providing funds or financial services which are used, in whole or in part, for the manufacture, acquisition, possession, development, export, transshipment, brokering, transport, transfer, stockpiling or use of chemical toxins, and their means of delivery and related materials, including both technologies and goods used for non-legitimate purposes;
- b) Biological and Toxin Weapon Prohibition Act 2018, which means the act of providing funds or financial services which are used, in whole or in part, for the manufacture, acquisition, possession, development, export, transshipment, brokering, transport, transfer, stockpiling or use of any biological or toxin weapon and its means of delivery and related materials, including both technologies and goods used for non-legitimate purposes
- c) Nuclear Weapons Prohibition Act 2018, which means the act of providing funds or financial services which are used, in whole or in part, for the manufacture, acquisition,

possession, development, export, transshipment, brokering, transport, transfer, stockpiling or use of any nuclear weapon and its means of delivery and related materials, including both technologies and goods used for non-legitimate purposes

Senior Management: with respect to a legal person or legal arrangement means a director, controlling officer, partner or any person who is concerned with the management of its affairs.

Suspicious transaction: means a transaction which-

- (a) gives rise to a reasonable suspicion that it may involve financial offence,
- (b) gives rise to a reasonable suspicion that it may involve property connected to, or to be used to finance terrorism, whether the property represents the proceeds of an offence,
- (c) is made in circumstances of unusual or unjustified complexity,
- (d) appears to have no economic justification or lawful objective,
- (e) is made by or on behalf of a person whose identity has not been established to the satisfaction of the person with whom the transaction is made, or (f) gives rise to suspicion for any other reason.

Terrorist Financing: Terrorist Financing offences extend to any person who wilfully provides or collects funds by any means, directly or indirectly, with the unlawful intention that they should be used or in the knowledge that they are to be used in full or in part to carry out a terrorist act by a terrorist organisation or an individual terrorist.

Transaction: includes the purchases made to bet, buying of gaming chips, buying of lottery tickets and any purchase made at a gambling establishment.

2. INTRODUCTION

- 2.1. It is the responsibility of the Gambling Authority (“the Authority”) as a Supervisory Authority in consultation with the Financial Intelligence Agency (the Agency) to issue Guidelines to Casinos to ensure that they comply accordingly with the provisions of the Financial Intelligence Act 2019 (“FI Act”).
- 2.2. The United Nations Security Council (UNSC) has adopted various resolutions to protect the international community from the proliferation of weapons of mass destruction. There is a need for all countries to understand and apply the international sanctions regime and to take necessary steps to prevent sanctions violations as part of their obligations under the relevant United Nations Security Council Resolutions.
- 2.3. Recommendation 7 of the Financial Task Force (FATF) requires countries to implement targeted financial sanctions to comply with United Nations Security Council resolutions relating to the prevention, suppression, and disruption of the proliferation of weapons of mass destruction and its financing.
- 2.4. Targeted financial sanctions relating to proliferation financing are applicable to persons and/or entities designated by the UN Security Council or the relevant committees set up by the Security Council.
- 2.5. Countries are required to freeze immediately the funds, other financial assets, and economic resources which are on their territories or under their jurisdiction at the date of adoption of the resolution or at any time thereafter, that are owned or controlled, directly or indirectly by the designated persons/entities. Moreover, countries should ensure that no funds or other assets and economic resources are made available to such persons and entities, except in specific situations, and under conditions specified in the UNSC resolutions.

- 2.6. The purpose of these Guidelines is to raise awareness of the risks and vulnerabilities associated with proliferation and proliferation financing and assist Casinos to comply with the FI Act as per section 44 (1) as well as compliance to the UNSC Resolutions relating to proliferation and proliferation financing.

3. SCOPE OF THE GUIDELINES

3.1. This document intends to cover the following:

- a) The definition of proliferation and proliferation financing;
- b) International and legal requirements imposed on reporting entities to implement targeted financial sanctions against proliferation financing by Casinos;
- c) Implementing a risk-based approach to implement targeted financial sanctions against countering proliferation and proliferation financing;
- d) Laws applicable to implement targeted financial sanctions against countering proliferation and proliferation financing; and
- e) Examples of activities related to countering proliferation and proliferation financing.

3.2. The Guidance Note should be read in conjunction with the FI Act and the FI Regulations, The Counter-Terrorism (Implementation of United Nations Security Council Resolutions) Regulations, international standards, and other guidelines provided by competent authorities.

4. APPLICABILITY

- 4.1. These guidance notes are applicable to all persons and entities regulated and supervised (Casinos) by the Gambling Authority.
- 4.2. After reading these guidance notes and considering the specified parties' business practices and possible exposure to the risks, Casinos may wish to consider measures such as-
 - Improved staff training;
 - Implementation of new policies and procedures or adaptation of existing ones;
 - Undertaking risk assessments;
 - Risk assessment of customers, suppliers, and third parties involved areas of their businesses; and
 - Employing enhanced due diligence procedures to any higher risk transactions or entities.

5. PROLIFERATION AND PROLIFERATION FINANCING

5.1. As the Financial Action Task Force (FATF) noted in its 2010 status report¹, there is at present no internationally agreed definition for “proliferation financing”. However, the FATF project team who worked on the 2010 status report verged on the following provisional definition:

"Proliferation financing" refers to:

the act of providing funds or financial services which are used, in whole or in part, for the manufacture, acquisition, possession, development, export, transshipment, brokering, transport, transfer, stockpiling or use of nuclear, chemical or biological weapons and their means of delivery and related materials (including both technologies and dual use goods used for nonlegitimate purposes), in contravention of national laws or, where applicable, international obligations.

5.2. According to the FI Act Section 2, Proliferation means the manufacture, acquisition, possession, development, export, transshipment, brokering, transport, transfer, stockpiling or use of any arms of war or NBC weapons in contravention of the Arms and Ammunition Act, Nuclear Weapons (Prohibition) Act, Biological and Toxin Weapons (Prohibition) Act or Chemical Weapons (Prohibition) Act.

5.3. Proliferation of Chemical weapons is provided for under the Chemical Weapons (Prohibition) Act, 2018, Section 14(f) which prohibits the engagement in proliferation financing of chemical weapons.

¹ The report can be accessed at <https://www.fatf-gafi.org/media/fatf/documents/reports/Status-report-proliferation-financing.pdf>

- 5.4. Proliferation of nuclear weapons is provided for under the Nuclear Weapons (Prohibition) Act, 2018, Section 5 (1)(d) which prohibits the engagement in proliferation financing of any nuclear weapons.
- 5.5. Proliferation of Biological and Toxin Weapons is provided for under the Biological and Toxins Weapons (Prohibition) Act, 2018, Section 5 (1)(d) which prohibits the engagement in proliferation financing of any biological or toxin weapon.
- 5.6. Proliferation can, therefore, take many forms, but ultimately it commonly involves the transfer or export of technology, goods, software, services, or expertise that can be used in programs involving nuclear, biological, or chemical weapons, and their delivery systems - which may involve sophisticated technology, such as in long-range missiles; or it may involve a relatively simple, or even crude, device.
- 5.7. Proliferation poses a significant threat to national and global security. If appropriate safeguards are not established, maintained, and enforced for sensitive materials, technology, services, and expertise, they can:
- a) Become accessible to unauthorised or undesirable individuals and entities seeking to profit from acquiring and selling them on;
 - b) Be used in weapon of mass destruction (WMD) programmes; or
 - c) Find their way into the hands of terrorists.

6. TARGETED FINANCIAL SANCTIONS

6.1. The Counter-Terrorism (Implementation of United Nations Security Council Resolutions) Regulations, 2020 under regulation 10 states that;

A specified party, accountable institution or any other person shall without delay, and in no later than 8 hours, and without prior notice, identify and freeze all —

(a) property or economic resources that are wholly or jointly owned, held or controlled, directly or indirectly by a designated person, including property or economic resources that cannot be tied to a particular act of terrorism plot or threat;

(b) property or economic resources that are wholly or jointly owned, held or controlled, directly or indirectly by an entity acting on behalf of or at the direction of a designated person; or

(c) property or economic resources derived from or generated by such property or economic resources.

(2) For the purposes of sub regulation (1), in determining whether property or economic resources are controlled by a designated person, the fact that such property or economic resources are held in the name of an associate or relation is immaterial.

(3) Property or economic resources frozen under this Regulation shall be recorded by persons referred to in sub regulation (1) against the names of the owners and beneficial owners for proper management.

(4) Subject to the provisions of these Regulations or the applicable Resolution, a specified party, accountable institution, or any other person shall not make frozen property, economic resources or financial or other related services available directly or indirectly for the benefit of —

(a) a designated person;

(b) any entity or group wholly or jointly owned or controlled directly or indirectly by a designated person; or

(c) persons, entities, or groups acting on behalf of, or at the direction of a designated person.

(5) A specified party, accountable institution or any other person shall without delay, inform the Committee of the full particulars of any property or economic resources identified and frozen (including transactions and attempted transactions relating to the funds, property or economic resources) and where no such property or

economic resources are identified, the specified party, accountable institution or person shall make a nil report to the Committee.

(6) The particulars required under subregulation (5) shall include —

(a) in relation to a specified party that is a financial institution —

(i) the account number,

(ii) the name of the account holder,

(iii) the time of the freezing of the account,

(iv) the balance of the account at the time of freezing of the property or economic resources,

(v) the related accounts, if any, including the balance of property or economic resources in the accounts at the time of freezing; and

(vi) an explanation as to the grounds for the identification of the related accounts;

(b) in relation to any other specified party, accountable institution or a person —

(i) the nature and description of the property or economic resources,

(ii) the name of the owner or holder of the property or economic resources,

(iii) the mode and date of acquisition of the property or economic resources,

(iv) the location of the property or economic resources, and

(v) the transactions relating to the property or economic resources.

(7) A person who knowingly contravenes sub regulation (4) commits an offence of financing of terrorism and is liable to a penalty specified in the Act.

(8) Any action taken under this regulation shall be communicated by the Minister through the ministry responsible for foreign affairs to the relevant Sanctions Committee.

(9) The Chairperson of the Committee shall, after the United Nations List has taken effect, as soon as practicable inform in writing, the designated person or entity of the —

(a) inclusion in the United Nations List;

(b) implications of the United Nations listing;

(c) procedure for review and information on de-listing process including the availability of the office of the Ombudsperson; and

(d) the possibility of utilising part of the frozen property or economic resources in accordance with these Regulations.

6.1.1. Casinos are therefore required to implement targeted financial sanctions related to proliferation by freezing without delay, the funds, or other assets of designated persons and entities, record property or economic resources frozen against the names of the owners and beneficial owners for proper management and shall without delay, inform the Committee of the full particulars of any property or economic resources identified and frozen (including transactions and attempted transactions relating to the funds, property or economic resources) and where no such property or economic resources are identified, the Casino shall make a nil report to the Committee.

7. INDICATORS OF POSSIBLE PROLIFERATION FINANCING

7.1. The following are indicators of possible proliferation financing as per the FATF guidance on Counter proliferation financing 2018². It should be noted that the information below is not uniquely determinative of proliferation financing, proliferation financing activities may share similar traits with money laundering (especially trade-based money laundering) and terrorist financing activities.

- a) Transaction involves a person or entity in a foreign country of proliferation financing.
- b) The customer or counter-party or its address is similar to one of the parties found on publicly available lists of ‘denied persons’ or has a history of export control contraventions.
- c) Customer activity does not match business profile, or end-user information does not match end-user’s business profile.
- d) Order for goods is placed by firms or persons from foreign countries other than the country of the stated end-user.
- e) Transaction involves the shipment of goods incompatible with the technical level of the country of which it is being shipped, (e.g. semiconductor manufacturing equipment being shipped to a country that has no electronics industry).
- f) Transaction involves possible shell companies (e.g. companies do not have a high level of capitalisation or displays other shell company indicators).
- g) Transaction demonstrates links between representatives of companies exchanging goods i.e. same owners or management.
- h) Pattern of wire transfer activity that shows unusual patterns or has no apparent purpose.
- i) Customer vague/incomplete on information it provides, resistant to providing additional information when queried.
- j) Transaction involves financial institutions with known deficiencies in AML/CFT controls and/or domiciled in countries with weak export control laws or weak enforcement of export control laws.

² The guidance notes can be accessed at <http://www.fatf-gafi.org/media/fatf/documents/reports/Guidance-Countering-Proliferation-Financing.pdf>

8. HOW PROLIFERATION FINANCING DIFFERS FROM MONEY LAUNDERING

8.1. Proliferators operate globally, try to mask their activities as legitimate trade, and exploit global commerce by trading in countries with weak export controls or free trade zones.

8.2. The stages of proliferation financing differ from the **placement-layering-integration** cycle associated with money laundering. Rather, the pattern used by proliferators is a **linear Raise – Obscure – Procure & Ship**.

- i) **Raise stage** - Funds are raised from overseas criminal activities, state budgets, and overseas commercial enterprises.
- ii) **Obscure stage** - Proliferators rely on extensive networks of businesses (including front companies) and middlemen to obscure any connection on paper to sanctioned countries. Countries use unclear ownership structures for evading sanctions lists.
- iii) **The Procure & Ship stage** - involves expenses associated with brokers, shippers, freight forwarders, insurance coverage, for goods and technology that is intended to be delivered to conduit countries for final entry into a sanctioned country. It is important to note that proliferation involves not only the purchase of weapons but also of individual goods and component parts that can be used to develop weapons or missiles. This makes proliferation activities more difficult to detect.

8.3. Unlike money laundering, which is concerned about funds raised by illegitimate means, the source of funds used to finance proliferation can be both legal and illegal. The destination or use of those funds is for advancing the ambitions of sanctioned states. In many cases the financing source is from a state or a person acting as an indirect agent of the state.

9. COMPARISON OF PROLIFERATION FINANCING TO MONEY LAUNDERING AND TERRORIST FINANCING

	MONEY LAUNDERING	TERRORIST FINANCING	PROLIFERATION FINANCING
Flow of Funds	Circular – money eventually ends up with the person that generated it	Linear – money generated is to finance terrorist groups and activities	Linear – money is used to purchase goods and parts, technology from brokers and manufacturers. Shipping and insurance also part of money trail
Channels	Favours formal financial system	Favours cash couriers or informal systems such as hawala and currency exchange firms	Favours formal financial system
Detection Focus	Suspicious transactions deposits uncharacteristic of customer's or the expected activity	Suspicious relationships, such as wire transfers to seemingly unrelated parties	Goods and materials, activities, countries, individuals

10. RISKS ASSOCIATED WITH PROLIFERATION FINANCING

- 10.1. An understanding of financing risks will positively contribute to the country's ability to prevent persons and entities involved in weapons of mass destruction, proliferation from raising, moving and using funds, and thus the implementation of targeted financial sanctions will in turn contribute to a robust counter proliferation financing regime.
- 10.2. Introducing proliferation financing within current risk assessment practice should be proportionate, given the overall proliferation risk associated with the activities undertaken by the Casino. An illustration, an institution operating internationally or with an international client base will generally assess a wider range of risks, including proliferation risks, compared to a smaller domestically focused institution.

a) Geographic Risks

Casinos must assess whether or not their customer is from a country that is subject to relevant UN sanctions (i.e. the Democratic Republic of Korea or Iran) or is listed on any reputable international listing of high risk entities more especially where Botswana has international relations of mutual benefit (i.e. UK/EU Specially targeted list or Office of Foreign Assets Control (OFAC) listing).

Factors to be considered:

- i) Countries with weak financial safeguards and which are actively engaged with a sanctioned country.
- ii) The presence of an industry that produces dual use goods, the proliferation sensitive items or military goods.
- iii) Countries that are known to have weak import/export control laws or poor enforcement; and
- iv) Countries that do not have the required level of technical competence regarding certain prohibited goods.

b) Customer Risk

At the inception of a business relationship (i.e. onboarding) and ongoing due diligence process, a Casino must determine the type of business the customer is engaged in to assess whether it poses potential proliferation risks.

Some of the red flags to considered are as follows.

- i) A customer is involved in the sale, supply, delivery or purchase of dual use, proliferation sensitive or military goods, particularly to high risk jurisdiction.
- ii) The customer or counter party, or its address, is the same or similar to that of the individual, or entity found on publicly available sanction lists.
- iii) The customer is a military or research body connected with a high-risk jurisdiction of proliferation concern.
- iv) The customer's activities do not match the business profile.
- v) The customer is vague about the end – users and provides incomplete information or resistant when requested to provide additional information; and
- vi) A customer uses complicated structures to conceal involvement, for example, uses layer front companies, intermediaries, and brokers.
- vii) Customer vague/incomplete on information it provides, resistant to providing additional information when queried.

c) Product/Service Risk

Casinos must determine if the products and services they offer have the potential to contribute to proliferation and proliferation financing. Moreover, when carrying out the assessment's other variables specific to the customer or the transaction, such as the duration of the business relationship, purpose, corporate structure and the volume of the transaction must be considered.

11.MITIGATING PROLIFERATION FINANCING RISKS

11.1. Casinos have an obligation to conduct risk assessments of the risk of commission of financial offenses and to take appropriate measures to manage and mitigate the identified risks as per section 11 of the F.I Act 2019. It is based on their risk assessments that Casinos can manage their potential proliferation financing risks by implementing a Risk Based Approach that incorporates controls to mitigate the risk of proliferation financing within their current AML/CFT structures.

This could be achieved through:

- a) Applying an objective criterion to assess the potential proliferation financing risk by using a Casino's expertise and obtaining information from government entities.
- b) Building on the Casino's existing AML/CFT framework by incorporating proliferation risk factors for consideration along with the wider determination of risk factors;
- c) Using the Casino's established AML/CFT mechanism to conduct risk assessments and identify suspicious activity that applies to proliferation considerations;
- d) Implementing risk based anti-proliferation and proliferation financing policies to identify suspicious activity and a system for reporting suspicious transactions; and
- e) Developing and implementing in-house policies and procedures relative to countering proliferation and proliferation financing and compliance with these proliferation financing guidelines.

11.2. Introducing proliferation financing into an institution's current risk assessment practice should be proportionate to the overall proliferation risk of the activities currently undertaken by the institution. Casinos must adopt policies preventing client relationships that expose the Casinos to countries, customers, and products that are higher risk for proliferation financing.

11.3. The following risks may be relevant to formulating a proliferation focused risk assessment.

a) Geographical Risks

The most immediate indicator will be links to a country that is subject to sanctions imposing restrictions on the movement of military goods. In addition, sanctions measures requiring specific action against proliferation have been applied in respect of Iran and North Korea.

Other high-risk indicators may be that a country:

- i) Presents an ongoing and substantial money laundering and terrorist financing risks or have strategic deficiencies in the fight against money laundering and the financing of terrorism, e.g. those identified by the FATF;
- ii) Is listed by the UN Sanction list;
- iii) Has strong links (such as funding or other support) with terrorist activities; and
- iv) Has diplomatic or economic relationships with a UN sanctioned country. For example, Bangladesh, China, Hong Kong, Singapore, and Vietnam have either diplomatic or economic (or both) relationships with the Democratic People's Republic of Korea.

b) Customer Risks

Specific categories of a customer whose activities may indicate a higher risk are:

- i) Those on national lists concerning high risk entities;
- ii) Where a military or research body is connected with a higher-risk jurisdiction of proliferation concern; and
- iii) Where a customer is involved in the supply, purchase, or sale of dual-use, proliferation-sensitive or military goods.

c) Products and Service Risks

The following may suggest higher risks:

- i) Delivery of services subject to sanctions. e.g. correspondent banking services;
- ii) Project financing of sensitive industries in higher risk jurisdictions; and
- iii) Trade finance services, transactions, and insurance products involving higher risk jurisdictions; or delivery of high volumes of dual-use, proliferation-sensitive or military goods, particularly if to a higher risk country.

d) High Risk Transaction and Entities

- (i) Lists compiled by international authorities may assist an institution, by providing information on entities and individuals who may pose a proliferation concern.

12.THE FATF WORKING GROUP ON TERRORIST FINANCING AND MONEY LAUNDERING (WGTM)

12.1. The FATF's WGTM Project Team on Proliferation Financing suggests several measures which can be implemented by Casino's to mitigate the risk posed by high risk customers. All Casinos should possess adequate policies and processes including strict customer due diligence (CDD) rules to promote high ethical and professional standards in the financial sector and prevent the Casino's from being used, intentionally or unintentionally, for criminal activities.

12.2. Casino's must have a robust ML/FT/PF Risk Management program in place that incorporates the following:

- a) Customer and transaction screening, which includes, enhanced due diligence, increased monitoring, enhanced frequency relationship reviews, and Senior Management approval;
- b) Account monitoring, with the use of automatic systems such as post-event monitoring of account activity; and
- c) Reporting of Suspicious Transactions.

13. CONCLUSION

- 13.1. Casinos are advised to exercise extreme caution when dealing with countries on the UN or EU sanctions lists, or residents of those countries, or transactions associated with those countries, or transactions associated with those countries (see EU Sanctions Risk List Countries). Casino's are expected to enhance their risk management programs to ensure that they are not engaging people or entities that are appreciably exposed to proliferation risks, rather than attempting to manage those risks.
- 13.2. Casinos operating internationally or who do business with international customers from high risk countries will need to know in real time, which countries are on the EU or UN Sanctions lists, as per the UK/EU Specially Targeted List or as per the OFAC listing, and carefully monitor any connections to those countries, including reporting, suspicions transactions to the FIA.