

# **AML & Sanction Atlas™ - Country Risk Ratings**

**Technology purpose built by compliance professionals to manage compliance risk.**

**Providing AML country risk ratings to financial institutions worldwide since 2005.**

***[www.amlatlas.com](http://www.amlatlas.com)***

# AML & Sanctions Atlas™ – Product Overview

AML & Sanctions Atlas™ is a geographic risk assessment database that rates countries according to their risk of money laundering and terrorist financing. Each country is assigned a risk score, a rank, and a rating of high, medium, or low, based on the cumulative weight of factors indicative of money laundering and terrorist financing.



AML & Sanctions Atlas™ is used by over 30 financial institutions worldwide.

AML & Sanctions Atlas™ replaces existing internally developed high risk country lists for use in:

- Transaction monitoring systems;
- Know your customer programs; and
- Enterprise-wide risk assessments.

# AML & Sanctions Atlas™ – Key Features

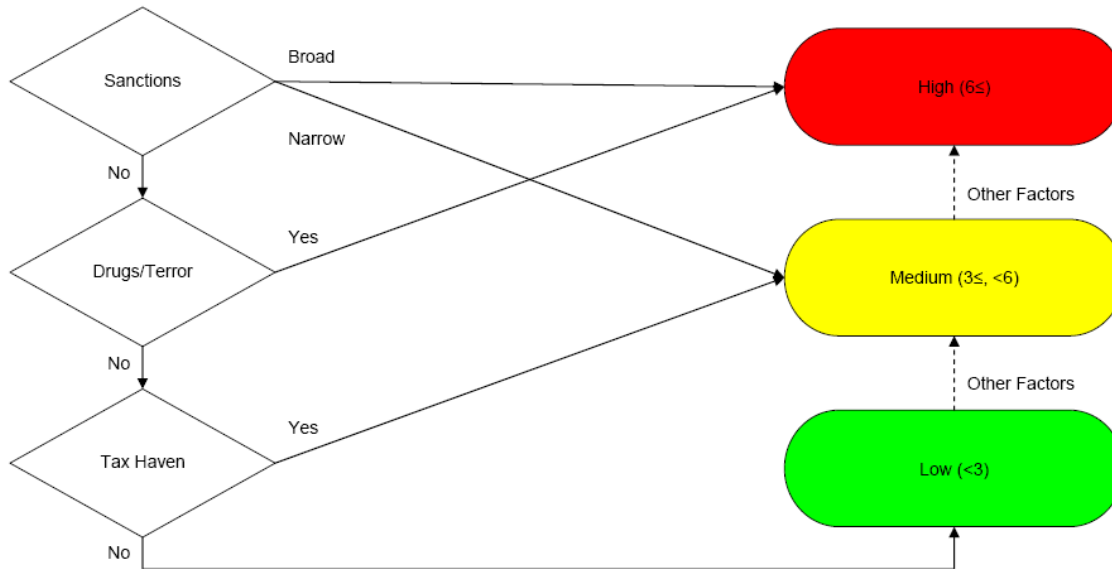
- **Comprehensive Coverage**
  - Provides geographic risk scores and data for 280 geographies.
- **Tested Methodology**
  - Analyzes 42 data points to risk-rate each country.
- **Authoritative Sources**
  - Based on data compiled from 20 data sources.
  - Based upon guidance and feedback from regulators and leading financial institutions.
- **User Group Feedback**
  - Benefit from the feedback and experience of over 30 subscribers.
- **Dynamic Data**
  - Periodically updated with the latest geographic risk data.
- **Customizable Ratings**
  - Change the weighting of risk factors to match your institution's risk tolerance.
- **International Perspective**
  - Ability to apply either a U.S. or non-U.S. scoring models.

# AML & Sanctions Atlas™ – Key Benefits

- **Less expensive than internally produced foreign country risk ratings**
  - Be sure to include the time to do the work AND the time of all the people involved in reviewing the results.
- **Comprehensive coverage**
- **Easier (less expensive) to keep up to date**
- **Shortens potentially endless discussions with internal stakeholders**
  - Internal Audit; and
  - Country Managers.
- **Saving time and money on country risk ratings allows you to allocate additional time and money to mitigating the risks you face**
  - Spend less time and money on risk assessments and more time and money on risk mitigation.

# AML & Sanctions Atlas™ – Tested Methodology

Map of Factors to Geographic Risk Classes



Our well-documented methodology is based on regulatory guidance and feedback from leading financial institutions.

# AML & Sanctions Atlas™ – Authoritative Sources

AML & Sanctions Atlas™ uses indicators derived from authoritative sources which are updated regularly, broadly applied and specific to money laundering.



HM TREASURY



TRANSPARENCY INTERNATIONAL  
the global coalition against corruption



THE WORLD BANK  
Working for a World Free of Poverty



# AML & Sanctions Atlas™ – 20 Authoritative Sources

Source	Relevance	Description
OFAC	Sanctions	Jurisdictions subject to sanctions programs administered by the Office of Foreign Assets Control (OFAC) of the U.S. Department of the Treasury
EU	Sanctions	Jurisdictions subject to sanctions programs decreed by the European Union
UN	Sanctions	Jurisdictions subject to sanctions programs decreed by the United Nations
FinCEN	Advisories	Jurisdictions identified by the Financial Crimes Enforcement Network (FinCEN) as representing a money laundering threat
FinCEN	Sec. 311	Jurisdictions identified as being of Primary Money Laundering Concerns by the U.S. Department of the Treasury under Sec. 311 of the USA PATRIOT Act
U.S. State Department	Terrorism	State Sponsors of Terrorism identified by the U.S. Department of State (State)
U.S. State Department	Drugs	Major Drug Transit or Producing Countries as identified by the President of the United States through State

# AML & Sanctions Atlas™ – 20 Authoritative Sources

Source	Relevance	Description
U.S. State Department	INCSR	Major Money Laundering Countries (Primary Concerns, Concerns, or Monitored) as identified by State in the International Narcotics Control Strategy Report (INCSR)
U.S. State Department	INCSR	Jurisdictions with weak AML legislation/regulation in respect to twenty one factors cited by State in the INCSR
FATF	NCCT	Jurisdictions identified as Non-Cooperative Countries and Territories (NCCT) identified by the Financial Action Task Force (FATF) and jurisdictions formerly on the list
FATF	Advisories	Jurisdictions identified in the FATF Public Statement as being a threat to the global financial system
FATF	Advisories	Jurisdictions monitored for deficiencies in their AML regimes by FATF
IMF	OFCs	Offshore Financial Centers identified by the International Monetary Fund (IMF)
OECD	Tax Havens	Un-cooperative Tax Havens identified by the Organisation for Economic Cooperation and Development (OECD)



# AML & Sanctions Atlas™ – 20 Authoritative Sources

Source	Relevance	Description
OECD	Tax Havens	Implementation of the Internationally Agreed Tax Standard identified by the OECD
Transparency International	Corruption	Corruption Perception Index published by Transparency International
World Bank	Corruption	Worldwide Governance Indicator on Control of Corruption as determined by the World Bank
World Bank	Governance	Worldwide Governance Indicators on Regulatory Quality as determined by the World Bank
World Bank	Governance	Worldwide Governance Indicators on Rule of Law as determined by the World Bank
PCS	Experiential Judgment	Expert judgment with input provided by Promontory consultants, regulators and officials in law enforcement agencies and AML & Sanctions Atlas™ Subscribers

# AML & Sanctions Atlas™ – Authoritative sources *plus* expert judgment

Promontory supplements the 19 public data sources with AML risk information that we receive from our informal channels around the world:

- Promontory consultants;
- Regulators and officials in law enforcement agencies; and
- AML & Sanctions Atlas™ subscribers.



# AML & Sanctions Atlas™ – Promontory Field Work

We supplement our database with our AML field work – Promontory Financial Group has conducted engagements in each of the highlighted countries.



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■ Promontory Client Countries

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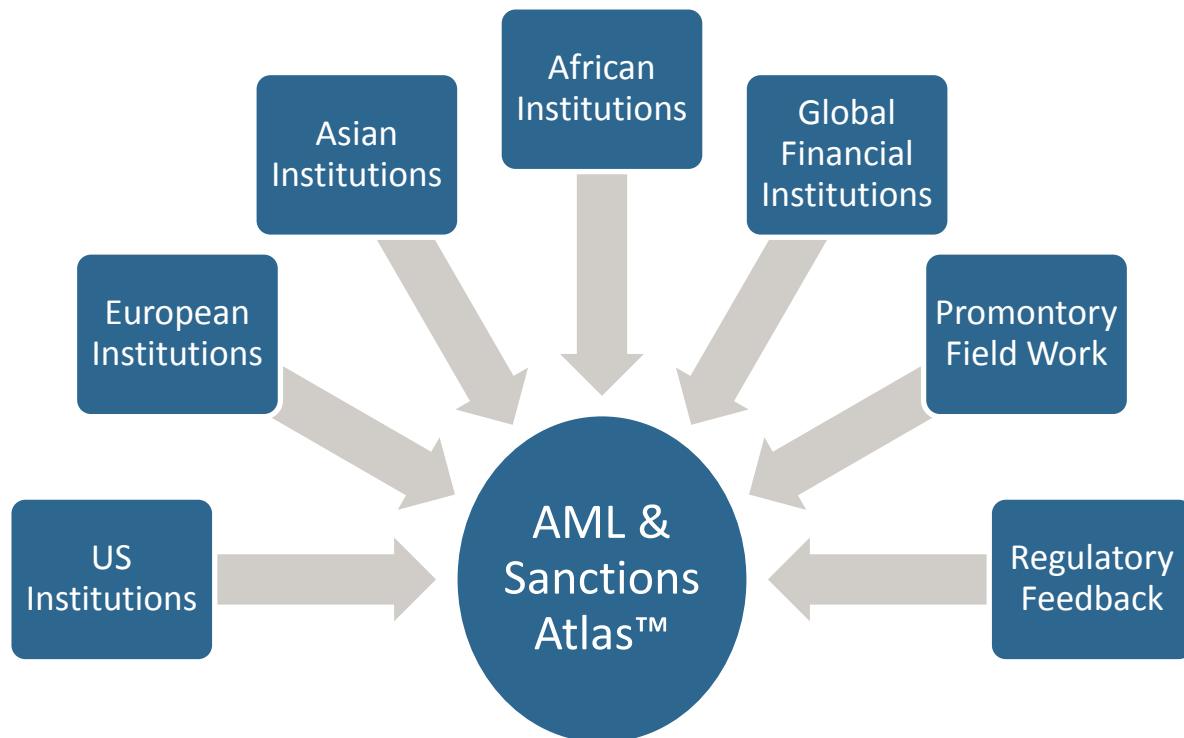
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# AML & Sanctions Atlas™ – Subscriber Network

Subscribers to AML & Sanctions Atlas™ include US, European, Asian and African financial institutions, and range from some of the biggest financial institutions in the world to community banking organizations. Subscribers include global financial institutions, community banks and broker-dealers. Subscribers not only use the database, but provide information and feedback that enriches it in the future.



# AML & Sanctions Atlas™ – Dynamic Data

Promontory checks for updates to AML & Sanctions Atlas™ data on a daily basis.

With a paid subscription, you will receive periodic updates to reflect current data. Scheduled updates occur twice a year in May and November.

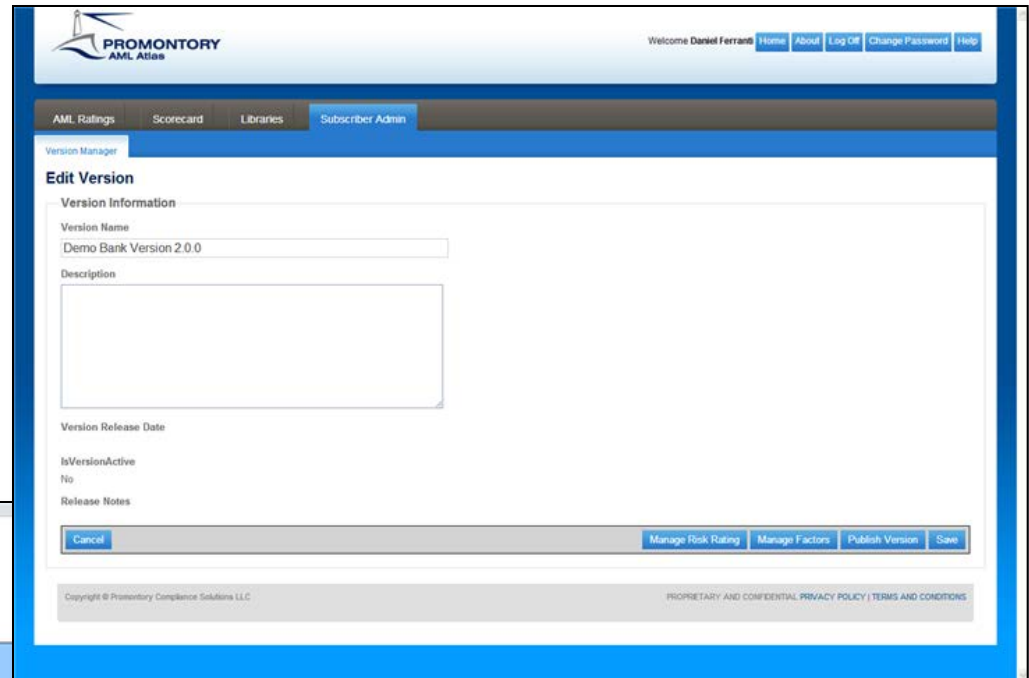
Interim updates may occur if there are significant developments in the underlying ratings.

Update Date	Country	Indicator	Old Data	New Data	Score Changes	Comments	Old Rating	New Rating
05/07/2007	Latvia	Adjustment	0	6	6	Promontory added 6 experiential judgment points based on regulator's concern about correspondent relationships with Latvian banks where there are third party funds transfers involving shell companies emanating from Latvian banks.	Low	High
06/12/2007	Burma (Myanmar)	USA PATRIOT Act Section 311 - Special Measures		Country	0	On November 18, 2003 Burma was designated a jurisdiction of primary money laundering concern and the Secretary of the Treasury proposed a special measure pursuant to 31 U.S.C. 5318A, as added by section 311, that generally prohibits certain U.S. financial institutions from establishing, maintaining, administering, or managing correspondent or payable-through accounts in the United States for, or on behalf of, Burmese banking institutions.	High	High
06/12/2007	Iran	European Union Sanctions		Narrow Sanctions	0	The EU passed Council Regulation 423/2007 on April 19, 2007. Promontory considers these regulations to be narrow in scope.	High	High
06/12/2007	Nauru	USA PATRIOT Act Section 311 - Special Measures		Country	0	On December 20, 2002 Nauru was designated a jurisdiction of primary money laundering concern and therefore subject to "special measures" under Section 311 of the Patriot Act.	High	High
11/30/2007	Antigua and Barbuda	IMF: Offshore Financial Centers	N	Y	0	Added Designation as Offshore Financial Center	Low	Medium
11/30/2007	Bahrain	IMF: Offshore Financial Centers	N	Y	0	Added Designation as Offshore Financial Center	Low	Medium
11/30/2007	Barbados	IMF: Offshore Financial Centers	N	Y	0	Added Designation as Offshore Financial Center	Low	Medium
11/30/2007	Costa Rica	IMF: Offshore Financial Centers	N	Y	0	Added Designation as Offshore Financial Center	Low	Medium
11/30/2007	Dominica	IMF: Offshore Financial Centers	N	Y	0	Added Designation as Offshore Financial Center	Medium	Medium
11/30/2007	Grenada	IMF: Offshore Financial Centers	N	Y	0	Added Designation as Offshore Financial Center	Medium	High
11/30/2007	Hong Kong	IMF: Offshore Financial Centers	N	Y	0	Added Designation as Offshore Financial Center	Low	Medium
11/30/2007	Ireland	IMF: Offshore Financial Centers	N	Y	0	Added Designation as Offshore Financial Center	Low	Medium
11/30/2007	Lebanon	IMF: Offshore Financial Centers	N	Y	0	Added Designation as Offshore Financial Center	High	High

The Update History serves as an audit trail of every data and scoring change and the Sources page provides hyperlinks to every primary source.

# AML & Sanctions Atlas™ – Customizable Ratings

Use Promontory's default rating methodology or use built in tools to apply your own scoring model.



Country Name	Office of Foreign Assets Control Sanctions	Risk Score	European Union Sanctions	Risk Score	United Nations Sanctions	Risk Score	FATF Non-Cooperative Countries and Territories	Risk Score
Afghanistan	Not Sanctioned	0	Narrow Sanctions	3	Narrow Sanctions	3		0
Akrotiri	Not Sanctioned	0	Not Sanctioned	0	Not Sanctioned	0		0
Albania	Not Sanctioned	0	Not Sanctioned	0	Not Sanctioned	0		0
Algeria	Not Sanctioned	0	Not Sanctioned	0	Not Sanctioned	0		0
American Samoa	Not Sanctioned	0	Not Sanctioned	0	Not Sanctioned	0		0
Andorra	Not Sanctioned	0	Not Sanctioned	0	Not Sanctioned	0		0
Angola	Not Sanctioned	0	Not Sanctioned	0	Not Sanctioned	0		0
Anguilla	Not Sanctioned	0	Not Sanctioned	0	Not Sanctioned	0		0
Antarctica	Not Sanctioned	0	Not Sanctioned	0	Not Sanctioned	0		0
Antigua and Barbuda	Not Sanctioned	0	Not Sanctioned	0	Not Sanctioned	0		0
Argentina	Not Sanctioned	0	Not Sanctioned	0	Not Sanctioned	0		0
Armenia	Not Sanctioned	0	Not Sanctioned	0	Not Sanctioned	0		0
Aruba	Not Sanctioned	0	Not Sanctioned	0	Not Sanctioned	0		0
Ashmore and Cartier Islands	Not Sanctioned	0	Not Sanctioned	0	Not Sanctioned	0		0
Australia	Not Sanctioned	0	Not Sanctioned	0	Not Sanctioned	0		0
Austria	Not Sanctioned	0	Not Sanctioned	0	Not Sanctioned	0		0
Azerbaijan	Not Sanctioned	0	Not Sanctioned	0	Not Sanctioned	0		0
Bahamas, The	Not Sanctioned	0	Not Sanctioned	0	Not Sanctioned	0	1	1

Data and weighting easily exports to spreadsheet format to be loaded into internal systems if needed.

# AML & Sanctions Atlas™ – International Perspective

AML & Sanctions Atlas™ uses international data where it is available.

AML & Sanctions Atlas™ provides two scoring models to account for different international perspectives on AML risk. Users choose between these two models.




- U.S. Perspective – the first model assigns heavy weights to risk factors derived from U.S. government sanctions programs (e.g., OFAC and Sec. 311) to reflect the importance that U.S. regulators place on compliance with these programs.
- Non-U.S. Perspective – the second model assigns slightly lower weights to U.S. sanctions programs relative to their international counterparts (e.g., EU and UN).

# AML & Sanctions Atlas™ – Country Snapshots

View and print the underlying source data for each country, displayed on an easy-to-read single-page scorecard.

Each country scorecard displays the raw data for each risk factor in addition to the weighted scores assigned by Promontory.

			<b>Scorecard</b>		
Country Name: <b>Afghanistan</b>		ISO Code: <b>AF</b>	Risk Score: <b>19.85</b>		<b>High</b>
Sovereign Parent: <b>Afghanistan</b>			Rank: <b>10</b>		
Indicator	Value	Score	Indicator	Value	Score
<b>Sanctions and Special Measures</b>			<b>World Bank Worldwide Governance Indicators</b>		
Office of Foreign Assets Control Sanctions	Not Sanctioned	0	World Bank: Rule of Law	-1.94	1
European Union Sanctions	Narrow Sanctions	3	World Bank: Regulatory Quality	-1.54	1
United Nations Sanctions	Narrow Sanctions	3	<b>Corruption Indicators</b>		
FATF Non-Cooperative Countries and Territories	0	0	Transparency International Corruption Perception Index	8	1
USA PATRIOT Act Section 311 - Special Measures	N	0	World Bank: Control of Corruption	-1.55	
<b>Terrorism and Drugs</b>			<b>INCSR: Major Money Laundering Countries</b>		
U.S. Department of State: State Sponsors of Terrorism	N	0	<b>INCSR: Detailed Criteria</b>		
Major Drug Transit and Drug Producing Countries	Y	6	Criminalized Drug Money Laundering	Y	0
<b>Offshore/Tax Haven</b>			Criminalized Beyond Drugs	Y	0
IMF: Offshore Financial Centers	N	0	KnowYourCustomer Provisions	Y	0
OECD: Uncooperative Tax Havens and Implementation of the Internationally Agreed Tax Standard	N	0	Report Large Transactions	Y	0
<b>FinCEN/FATF</b>			Report Suspicious Transactions (YPN)	Yes	0
FinCEN Advisories	N	0	Maintain Records Over Time	Y	0
FATF Public Statement: Apply Countermeasures	No	0	Disclosure Protection "Safe Harbor"	Y	0
FATF Public Statement: Prev. Committed to Action Plan	No	0	Criminalize "Tipping Off"	Y	0
FATF: Improving Global AML/CFT Compliance - Targeted Deficiency of Core Rec	2	1.5	Cross-Border Transportation of Currency	Y	0
FATF: Improving Global AML/CFT Compliance - Targeted Deficiency of Key Rec	4	2	Financial Intelligence Unit	Y	0
FATF: Improving Global AML/CFT Compliance - Targeted Deficiency of Core Rec	1	0.25	Intl Law Enforcement Cooperation	Y	0
			System for Identifying/Forfeiting Assets	Y	0
			Arrangements for Asset Sharing	N	0.0476
			Criminalized Financing of Terrorism	Y	0



# AML & Sanctions Atlas™ – Contact Information

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