

# Joint Guidelines Compliance Table

JC/GL/2017/37

26 June 2017;

Joint Guidelines under Article 17 and 18(4) of Directive (EU) 2015/849 on simplified and enhanced customer due diligence and the factors credit and financial institutions should consider when assessing the money laundering and terrorist financing risk associated with individual business relationships and occasional transactions.

The following competent authorities\* comply or intend to comply with the ESAs' Joint Guidelines on simplified and enhanced customer due diligence:

	Competent authority	Relevant ESA/ESAs	Complies or intends to comply	Comments	
<b>Member States</b>					
BE	Belgium	National Bank of Belgium	EBA	Yes	As at 22.02.2018, notification date.
BG	Bulgaria	Българска народна банка (Bulgarian National Bank)	EIOPA, ESMA	Intends to comply**	By 26.06.2018.
			EBA	Yes	As at 05.02.2019, notification date. <b>Relevant national laws and regulations:</b> <ul style="list-style-type: none"> <li>Art.74a Law on credit institutions (LCI); Art. 79a (1) p.2 LCI; <a href="http://bnb.bg/bnbweb/groups/public/documents/bnb_law/laws_creditinstitutions_en.pdf">http://bnb.bg/bnbweb/groups/public/documents/bnb_law/laws_creditinstitutions_en.pdf</a></li> <li>Art. 24 (5) Law on the measures against money laundering (LMML); Art. 25(3) p.7 LMML;</li> </ul>



		Competent authority	Relevant ESA/ESAs	Complies or intends to comply	Comments
					Art. 31 LMML; Art. 46 (3) LMML; Art. SO LMML; Art. 51 (2) p.1; Art. 54 (7) Art. 22 Regulation on the implementation of the Law on the measures against money Laundering <a href="https://www.dans.bg/">https://www.dans.bg/</a>
CZ	Czech Republic	Czech National Bank	EBA	Yes	As at 19.02.2018, notification date. The obligation to follow the risk-based approach in respect of the anti-money laundering/counter-terrorism financing preventive measures is already incorporated in the Act no. 253/2008 Coll., on the prevention of money laundering and terrorism financing ( <a href="http://www.financnianal.ytickyurad.cz/pravni-predpisy.html">http://www.financnianal.ytickyurad.cz/pravni-predpisy.html</a> ). The Czech National Bank follows the joint guidelines in its supervisory practices and published the joint guidelines on the following links in the Czech and English languages: <a href="https://www.cnb.cz/cs/dohled-financni-trh/legislativni-zakladna/legalizace-vynosu-z-trestne-cinnosti/metodicke-a-vykladove-materialy/#">https://www.cnb.cz/cs/dohled-financni-trh/legislativni-zakladna/legalizace-vynosu-z-trestne-cinnosti/metodicke-a-vykladove-materialy/#</a> <a href="https://www.cnb.cz/en/supervision-financial-market/legislation/money-laundering/methodological-and-interpretative-documents/">https://www.cnb.cz/en/supervision-financial-market/legislation/money-laundering/methodological-and-interpretative-documents/</a>
		Financial Analytical Office (FIU)	EBA, EIOPA, ESMA	Intends to comply**	By 01.01.2019.
DK	Denmark	Danish FSA	EBA	Yes	As at 04.02.2019, notification date.



	Competent authority	Relevant ESA/ESAs	Complies or intends to comply	Comments	
DE	Germany	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)	ESMA, EIOPA	Intends to comply**	By 26.06.2018.
			EBA	Yes	As at 04.02.2019, notification date.
EE	Estonia	Finantsinspektsioon	EBA	Intends to comply**	By 27.11.2018. According to Money Laundering and Terrorist Financing Prevention Act § 101 (1), the obliged entity must bring its activity into compliance with the requirements of this Act within one year as of the entry into force of this Act. In Estonia, this Act entered into force on 27 Nov 2017, therefore, Finantsinspektsioon Intends to comply with these Guidelines by 27 Nov 2018.
IE	Ireland	Central Bank of Ireland	EBA	Yes	As at 05.03.2018, notification date. The Central Bank of Ireland has implemented the guidelines contained in the Risk Factor Guidelines ("Guidelines") into its supervisory processes without the requirement for legal amendment. The Central Bank has the appropriate powers to comply with the Guidelines within existing domestic legislation, as provided for in the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, as amended, and the Central Bank Acts. On November 2nd 2017, the Central Bank of Ireland issued an Anti-Money Laundering bulletin. The main purpose of the bulletin was to provide guidance in



		Competent authority	Relevant ESA/ESAs	Complies or intends to comply	Comments
					<p>relation to suspicious transaction reporting. However, this edition of the bulletin gave an opportunity to provide an update on some of the latest developments. Included in this was an overview of the Risk Factor Guidelines. The bulletin was published on the Central Bank of Ireland website.</p> <p><a href="https://www.centralbank.ie/docs/default-source/Regulation/how-we-regulate/anti-money-laundering-and-countering-the-financing-of-terrorism/legislation/anti-money-laundering-bulletin-on-suspicious-transaction-reporting---november-2017.pdf?sfvrsn=3">https://www.centralbank.ie/docs/default-source/Regulation/how-we-regulate/anti-money-laundering-and-countering-the-financing-of-terrorism/legislation/anti-money-laundering-bulletin-on-suspicious-transaction-reporting---november-2017.pdf?sfvrsn=3</a></p> <p>The Central Bank of Ireland has published the Risk Factor Guidelines on its website.</p> <p><a href="https://www.centralbank.ie/regulation/anti-money-laundering-and-countering-the-financing-of-terrorism/guidance-on-risk">https://www.centralbank.ie/regulation/anti-money-laundering-and-countering-the-financing-of-terrorism/guidance-on-risk</a></p> <p>The Central Bank of Ireland has also spoken at a number of outreach events with industry where it highlighted the publication of the Risk Factor Guidelines and the requirement to comply with these guidelines. As an example, please find attached presentation to Financial Services Ireland in November 2017.</p>



		<b>Competent authority</b>	<b>Relevant ESA/ESAs</b>	<b>Complies or intends to comply</b>	<b>Comments</b>
EL	Greece	Bank of Greece	EBA	<b>Intends to comply**</b>	By 31.05.2019. Directive (EU) 2015/849 was transposed into the Greek legal framework on the 30th of July of 2018 by Law 4557. There are two specific provisions in art. 15, par. 3 and art. 16, par. 5 of the Law, authorizing competent authorities of the financial sector to issue detailed guidelines on the factors of higher and lower risk and the appropriate due diligence measures to be applied respectively, based explicitly on the Risk Factors Guidelines issued by ESAs. The Bank of Greece will issue the new Regulatory Act specifying the provisions of Law 4557/30.7.2018, which will include the incorporation of the Risk Factors Guidelines by 31/5/2019.
HR	Croatia	National Bank of Croatia	EBA	<b>Yes</b>	As at 01.02.2019, notification date. In June 2018 Croatian National Bank has adopted Decision on the assessment procedure of the money laundering and terrorist financing risk and on simplified and enhanced customer due diligence measures in which it has implemented provisions of the Joint Guidelines under Articles 17 and 18(4) of Directive (EU) 2015/849 on simplified and enhanced customer due diligence and the factors credit and financial institutions should consider when assessing the money laundering and terrorist



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					financing risk associated with individual business relationships and occasional transactions (JC/2017/37). The above Decision represents bylaw and is published in Official Gazette (57/2018.). Link to the Decision is given here ( <a href="https://narodne-novine.nn.hr/clanci/sluzbeni/full/2018_06_57_1178.html">https://narodne-novine.nn.hr/clanci/sluzbeni/full/2018_06_57_1178.html</a> )
		Finance Inspectorate - Ministry of Finance	EBA, EIOPA, ESMA	<b>Intends to comply**</b>	<p>By 30.06.2019. Agents of payment service providers from other member states from non banking sector supervising by Financial Inspectorate apply the Decision on risk assessment procedure for money laundering and terrorist financing and the manner of implementing measures of simplified and enhanced due diligence, published in the official Gazette no. 57/2018.</p> <p>Link: <a href="https://narodne-novine.nn.hr/clanci/sluzbeni/full/2018_06_57_1178.html">https://narodne-novine.nn.hr/clanci/sluzbeni/full/2018_06_57_1178.html</a></p> <p>There is ongoing alignment of AMLCFT Law with the 5th AML Directive and consideration is being given to the adoption of one sub-legal act encompassing all providers of the same financial services regardless of who supervises them. If the above mentioned proposal is not adopted, upon completion of the legislative procedure the Financial Inspectorate will adopt a by-law, which will</p>



		<b>Competent authority</b>	<b>Relevant ESA/ESAs</b>	<b>Complies or intends to comply</b>	<b>Comments</b>
					cover the scope of reporting entities within its competence (authorized exchange offices and consumer credit providers) - planned until 30 June 2019.
ES	Spain	Sepblac	<b>EBA</b>	<b>Yes</b>	As at 05.03.2018, notification date.
FR	France	Autorite de controle prudentiel et de resolution (ACPR)	<b>EBA, EIOPA, ESMA</b>	<b>Intends to comply**</b>	By such time as the necessary legislative or regulatory proceedings have been completed. The ACPR is about to comply with the joint guidelines. As mentioned in the previous compliance confirmation, several texts were necessary to bring them into force. At present, the decree implementing the 4th AML/CFT directive has been published and soft law instruments have been drafted or revised in the framework of the implementation of said directive (publication of Guidelines on politically exposed persons in March 2018, Guidelines on correspondent banking in June 2018 and Guidelines on customer identification, verification of identity and up-to-date knowledge in December 2018). The adoption of the National Risk Assessment by the "Conseil d'orientation de la Jute contre le blanchiment", which is an independent public body, is about to take place.



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					In addition, as regards the reservations mentioned during the adoption of these guidelines by the BoS, the ACPR is compliant, as the mere exchange of messaging capabilities such as SWIFT RMA are excluded from the scope of correspondent banking services, according to the 5th AML/CFT directive. Please note concerning the 5th AML/CFT directive, that ACPR is waiting for the Commission's view on whether principal -to-principal relationships fall under the definition of
IT	Italy	Banca d'Italia			
		Bank of Italy	<b>EBA</b>	<b>Intends to comply**</b>	By 26.06.2018.
CY	Cyprus	Central Bank of Cyprus	<b>EBA</b>	<b>Intends to comply**</b>	By 30.06.2018.
LV	Latvia	Financial and Capital Market Commission	<b>EBA, EIOPA, ESMA</b>	<b>Yes</b>	As at 01.01.2019, notification date. Most of the risk factors are covered under the following regulatory framework: 1) FCMC Regulations No 2 of 9 January 2018 Regulations for Enhanced Customer Due Diligence ( <a href="http://www.fctk.lv/en/law/general/fcmc-regulations/7150-fcmc-regulations-no-2-regulations-for-enhanced-">http://www.fctk.lv/en/law/general/fcmc-regulations/7150-fcmc-regulations-no-2-regulations-for-enhanced-</a>





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					<p><a href="#">customer-due-diligence.html</a> )</p> <p>2) FCMC Regulations No 3 of 9 January 2018 Regulatory Provisions for Credit Institutions and Licensed Payment and Electronic Money Institutions on Enhanced Customer Due Diligence <a href="http://www.fktk.lv/en/law/general/fcmc-regulations/7149-fcmc-regulations-no-3-regulatory-provisions-for-credit-institutions-and-licensed-payment-and-electronic-money-institutions-on-enhanced-customer-due-diligence.html">http://www.fktk.lv/en/law/general/fcmc-regulations/7149-fcmc-regulations-no-3-regulatory-provisions-for-credit-institutions-and-licensed-payment-and-electronic-money-institutions-on-enhanced-customer-due-diligence.html</a>)</p> <p>3) FCMC Recommendation No. 152 of 25 September 2017 Recommendations to Credit Institutions for Identifying the "Red Flags" of Suspicious Transactions (<a href="http://www.fktk.lv/en/law/credit-institutions/fcmc-regulations/6583-recommendations-to-credit-institutions-for-identifying-the-red-flags-of-suspicioustransactions.html">http://www.fktk.lv/en/law/credit-institutions/fcmc-regulations/6583-recommendations-to-credit-institutions-for-identifying-the-red-flags-of-suspicioustransactions.html</a>)</p> <p>4) Article 11.1 (Customer Due Diligence Measures and Risk Factors) and Article 22 (Enhanced Customer Due Diligence) of the Law on the Prevention of Money Laundering and Terrorism Financing (<a href="http://www.fktk.lv/en/law/general/laws/4260-2010-04-01-law-on-the-prevention-of.html">http://www.fktk.lv/en/law/general/laws/4260-2010-04-01-law-on-the-prevention-of.html</a>)</p>

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					However, the FCMC has drafted new Regulations covering all the provisions set in the above mentioned legal acts and supplementing with the EBA risk factors that were not covered by any of national measures yet. The draft Regulations have been sent to the industry for evaluation. It is planned to adopt the Regulations in the FCMC Board by the end of February, 2019.
LT	Lithuania	Bank of Lithuania	EBA	Yes	As at 22.01.2019, notification date. Compliance with GL approved by 23 July 2018 Supervisory Service Decision No 241-174.
LU	Luxembourg	Commission de Surveillance du Secteur Financier (CSSF)	EBA	Yes	As at 05.02.2019, notification date.
HU	Hungary	Magyar Nemzeti Bank (Central Bank of Hungary)	EIOPA, ESMA	Intends to comply**	By 26.06.2018.
			EBA	Intends to comply**	By 31 March 2019.
MT	Malta	Malta Financial Services Authority (MFSA)	EBA	Intends to comply**	By 26.06.2018. <b>Annex A</b> FIAU and MFSA Joint Notification of Compliance Compliance with the Joint Guidelines under Articles 17 and 18(4) of Directive (EU) 2015/849 on simplified and enhanced customer due diligence and the factors credit and financial institutions should consider when assessing the money laundering and terrorist financing risk associated with individual business relationships and



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					<p>occasional transactions (The Risk Factors Guidelines). Introduction The Financial Intelligence Analysis Unit (FIAU) is the authority in Malta responsible for monitoring compliance with AML/CFT requirements and is so authorised in terms of the Prevention of Money Laundering Act (Chapter 373 of the laws of Malta). AML/CFT requirements emanate from the aforementioned Act, The Prevention of Money Laundering and Funding of Terrorism Regulations (Subsidiary Legislation 373.01) as well as the Implementing Procedures (general and sectorial), which are guidance notes issued by the FIAU. In carrying out supervision for AML/CFT purposes the FIAU cooperates with other supervisory authorities, and in the case of the credit and financial institutions, with the Malta Financial Services Authority (MFSA). In order to ensure efficient and effective AML/CFT supervision a decision was taken late in 2016 to put in place a joint AML/CFT supervisory mechanism between the FIAU and MFSA, applicable to credit and financial services licence holders. As of 2017 a coordinated AML/CFT supervisory approach has been adopted and AML/CFT supervision is being conducted in a joint and integrated manner by</p>



		Competent authority	Relevant ESA/ESAs	Complies or intends to comply	Comments
					<p>the FIAU and MFSA. The MFSA has also established a dedicated AML Unit in 2015 which started gradually assuming the responsibility of assisting the FIAU in AML/CFT supervision.</p> <p>For this purpose, joint supervisory procedures have been adopted and a common AML/CFT Supervisory Handbook is currently being produced. This handbook will incorporate the MOU between the FIAU and the MFSA, a high level AML/CFT Supervisory Framework, the Risk Assessment and Monitoring Procedures, Joint Supervisory Procedures and common supervisory tools.</p> <p>Intention to fully comply with the Risk Factors Guidelines</p> <p>The FIAU and MFSA intend to fully comply with the Risk Factors Guidelines by 26th June 2018.</p> <p>As has been already notified, work is currently underway to fully comply with the Risk Based Supervision Guidelines, and the FIAU and MFSA should be fully compliant with such by November 2017.</p> <p>The Risk Factors Guidelines are another aspect of the Risk Based Approach and have already been taken into consideration in the development of data collection tools for the supervisory authorities' risk assessment processes.</p>



		Competent authority	Relevant ESA/ESAs	Complies or intends to comply	Comments
					<p>It is the FIAU's and MFSA's intention to fully comply with the Risk Factors Guidance through amendments to the legal framework and more specifically through amendments to the FIAU's Implementing Procedures which will provide detailed guidance to obliged entities to assist them in carrying out risk assessments and adopting a risk-based approach to fulfil their AML/CFT obligations. Concurrently the FIAU and the MFSA will also ensure that the supervision methodology for assessing the adequacy of firms' risk assessments and AML/CFT policies and procedures takes into account the elements of the Risk Factors Guidance. Compliance through amendments to the legal framework</p> <p>The Maltese AML/CFT legal framework consists of three pillars, being the Prevention of Money Laundering Act - PMLA (Chapter 373 of the Laws of Malta), the Prevention of Money Laundering and Funding of Terrorism Regulations - PMLFTR (Subsidiary Legislation 373.01) and the FIAU's Implementing Procedures. The FIAU's Implementing Procedures are issued in terms of Regulation 17(1) of the PMLFTR, hence such Implementing Procedures are legally binding on all subject persons and any failure to comply may lead to the imposition of</p>



		Competent authority	Relevant ESA/ESAs	Complies or intends to comply	Comments
					<p>administrative sanctions by the FIAU.</p> <p>The FIAU Implementing Procedures are split into two parts; Part I and Part II. Part I is the general guidance document applicable to all obliged entities. Part II on the other is composed of various sector specific guidance documents applicable to specific categories of obliged entities or covering specific activities.</p> <p>It is therefore the intention of the FIAU to incorporate Risk Factors guidance of a general nature in the Implementing Procedures Part I (being the general guidance document applicable to all obliged entities) and Risk Factors guidance which is specifically intended for credit institutions and other financial institutions will be incorporated in the respective sector-specific procedures.</p> <p>Compliance through the updating of the FIAU and MFSA joint supervisory processes</p> <p>The FIAU and MFSA carry out the joint AML/CFT supervision by conducting onsite and offsite compliance examinations. Given that firms will now be able to adjust the extent of their customer due diligence (CDD) and other AML/CFT measures according to the ML/FT risk they have identified, the risk based approach and the application of it,</p>



		Competent authority	Relevant ESA/ESAs	Complies or intends to comply	Comments
					<p>will become the focus of compliance examinations carried out by the Authorities.</p> <p>The AML/CFT Supervisory Handbook will therefore specifically cater for these Risk factors Guidelines and the supervisory process will ensure that credit and financial institutions and other obliged entities comply in applying CDD, SDD and EDD. Finally, both the FIAU and MFSA will provide for appropriate training and tools to assist their officers in this regard.</p> <p>Conclusion</p> <p>The FIAU and MFSA intend to comply with The Risk Factors Guidelines by 26th June 2018.</p>
		FIAU			
NL	Netherlands	De Nederlandsche Bank	EBA	<b>Yes</b>	As at 04.03.2019, notification date.
AT	Austria	Financial Market Authority	EBA	<b>Yes</b>	<p>As at 27.02.2018, notification date.</p> <p>Art. 25 para 3 of the Financial Markets Anti-Money Laundering Act {Finanzmarkt-</p>



		Competent authority	Relevant ESA/ESAs	Complies or intends to comply	Comments
					<p>Geldwäschegesetz - FM-6wG, BGBl I Nr. 118/2016) stipulate as follows:</p> <p>(3) The FMA shall, in the enforcement of the provisions of this federal act, including the issuing of Regulations on the basis of this federal act and their enforcement, as well as on the basis of Regulation (EU) 2015/847 take into account European convergence in respect of supervisory tools and supervisory procedures. To this end, the FMA shall participate in the activities of the European Supervisory Authorities, and shall apply Guidelines, Recommendations and other measures decided upon by the European Supervisory Authorities. The FMA may deviate from the guidelines and recommendations of the European Supervisory Authorities when justified grounds exist to do so, in particular in the event of a conflict with provisions set out under national law."</p> <p>The FMA, in its AML/CFT guidance to financial institutions will take into consideration and also directly refer to the "Risk Factors Guidelines" where relevant.</p>
PL	Poland	Komisja Nadzoru Finansowego	EBA	<b>No</b>	<p>In respect to the document JC 2017 37 "Joint Guidelines under Articles 17 and 18(4) of Directive (EU) 2015/849 on simplified and enhanced customer due diligence and the factors credit and financial</p>





		Competent authority	Relevant ESA/ESAs	Complies or intends to comply	Comments
					<p>institutions should consider when assessing the money laundering and terrorist financing risk associated with individual business relationships and occasional transactions" KNF declares that it will make every effort to comply with the said guidelines, with the following exceptions. KNF will not apply, nor will we expect the financial institutions operating in Poland to apply:</p> <ul style="list-style-type: none"> <li>- Section 19, fifth bullet point in fine,</li> <li>- Section 50 (i),</li> <li>- Section 51 and 52,</li> </ul> <p>to extent in which those section require financial institutions to apply measures set out in art. 20 of the Directive, to customers who's beneficial owner is a PEP. In our opinion art. 20 of the Directive, when saying: "( ... ) apply the following measures in cases of business relationships with politically exposed persons ( ... )" sets out actions which should be taken by financial institution, but only in cases where business relationship is directly established with a PEP. In cases where a customer's beneficial owner is a PEP, as identified in accordance with art. 20 (a) of the Directive, financial institutions take this finding into consideration when assessing the risk associated with the</p>



		Competent authority	Relevant ESA/ESAs	Complies or intends to comply	Comments
					<p>business relationship, and may decide to apply enhanced CDD measures. However we do not interpret art. 20 as in the Guidelines, requiring application of ECDD in every case where customer's beneficial owner is a PEP. This KNF's interpretation stems directly from FATF Recommendation 12, which distinguishes relations with foreign PEP's, and domestic and international PEP's, considering that business relations with the latter do not always have to constitute high risk situations. Therefore if a direct business relationship with a domestic or international PEP does not necessarily have to be high risk, so the business relationship with a customer whose beneficial owner is a domestic PEP also doesn't have to be high risk. Automatic application of art. 20 in such cases is not prudent, and financial institutions based on their risk assessments and internal procedures should have to possibility to asses risk of such business relations. KNF will however expect all business relations with customers whose beneficial owner is a foreign PEP to be treated by financial institutions operating in Poland as high risk in accordance with art. 20 of the Directive.</p>



		Competent authority	Relevant ESA/ESAs	Complies or intends to comply	Comments
PT	Portugal	Banco de Portugal	EBA	Yes	As at 05.02.2019, notification date. Full compliance has been achieved as the necessary regulatory procedures have been adopted and additional elements to strengthen the risk-based approach already foreseen in domestic legislation have been implemented. With the entry into force of Law no. 83/2017 of 18 August 2017 and Notice of Banco de Portugal no. 2/2018 of 26 September 2018, Banco de Portugal has ensured complete compliance with the Guidelines herein referred. The aforementioned diplomas can be consulted at <a href="https://www.bportugal.pt/legislacao/lei-no-832017-de-18-de-agosto">https://www.bportugal.pt/legislacao/lei-no-832017-de-18-de-agosto</a> and <a href="https://www.bportugal.pt/aviso/22018">https://www.bportugal.pt/aviso/22018</a>
RO	Romania	National Bank of Romania	EBA, EIOPA, ESMA	Intends to comply**	As of <del>26.06.2018</del> or in case Directive 2015/849 is not transposed until this date, As of the date of entering into force of the law transposing the Directive (EU) 2015/849.
SI	Slovenia	Bank of Slovenia	EIOPA	Intends to comply**	By 31.05.2018.
			EBA	Complies	As at 01.06.2018, notification date. <a href="https://www.uradni-list.si/glasilo-uradni-list-rs/vsebina/2018-01-0594?so=2018-01-0594">https://www.uradni-list.si/glasilo-uradni-list-rs/vsebina/2018-01-0594?so=2018-01-0594</a>



		<b>Competent authority</b>	<b>Relevant ESA/ESAs</b>	<b>Complies or intends to comply</b>	<b>Comments</b>
SK	Slovakia	Národná Banka Slovenska	EBA	<b>Intends to comply**</b>	By 25.06.2018.
FI	Finland	Finanssivalvonta (FIN-FSA)	EBA, EIOPA, ESMA	<b>Intends to comply**</b>	By 30.09.2019. The amendments to the AML/CFT Act permitting compliance with Guidelines are in the parliamentary proceedings at the moment (Government's Proposal 16712018) and FIN-FSA's own regulations and guidelines concerning risk factors will be updated by the end of September 2019.
		Regional State Administrative Agency for Southern Finland			
SE	Sweden	Finansinspektionen	EBA	<b>Yes</b>	As at 02.03.2018, notification date. Finansinspektionen has published the Guidelines on our external website on the 25th of January 2018, <a href="http://www.fi.se/en/bank/money-laundering/process-work-method/risk-assessment/">http://www.fi.se/en/bank/money-laundering/process-work-method/risk-assessment/</a>
UK	United Kingdom	PRA	EBA	<b>Not applicable</b>	The scope of the Guidelines are outside of the scope of PRA competence, and are therefore not applicable to the UK PRA. The relevant UK authority is responding.

		<b>Competent authority</b>	<b>Relevant ESA/ESAs</b>	<b>Complies or intends to comply</b>	<b>Comments</b>
		Financial Conduct Authority	<b>EBA</b>	<b>Yes</b>	As at 20.03.2018, notification date.
<b>EEA – EFTA States</b>					
IS	Iceland	Financial Supervisory Authority , Iceland	<b>EBA</b>	<b>Intends to comply**</b>	By such time as the necessary legislative or regulatory proceedings have been completed.
LI	Liechtenstein	Liechtenstein Financial Market Authority	<b>EBA, EIOPA, ESMA</b>	<b>Yes</b>	As at 24.02.2019, notification date. The FMA complies with the JC/GL/2017/37 as of 26 June 2018.
NO	Norway	The Financial Supervisory Authority of Norway (Finanstilsynet)	<b>EIOPA, ESMA</b>	<b>Intends to comply**</b>	By such time as the necessary legislative or regulatory proceedings have been completed. Law proposal is currently being prepared for submission to the Norwegian Parliament.
			<b>EBA</b>	<b>Yes</b>	As at 28.01.2019, notification date.
<b>European Territories under Article 355(3) TFEU</b>					
UK	United Kingdom	Gibraltar Financial Services Commission	<b>EBA</b>	<b>Yes</b>	As at 04.02.2019, notification date.

\*The EEA States other than the Member States of the European Union are not currently required to notify their compliance with the ESAs’ Joint Guidelines. This table is based on information provided from those EEA States on a voluntary basis.

\*\* Please note that, in the interest of transparency, if a competent authority continues to intend to comply after the application date, it will be considered “non-compliant” unless (A) the Joint Guidelines relate to a type of institution or instruments which do not currently exist in the jurisdiction concerned; or (B) legislative or regulatory proceedings have been initiated to bring any national measures necessary to comply with the Joint Guidelines in force in the jurisdiction concerned.



## Notes

Article 16(3) of the ESAs' Regulations requires national competent authorities to inform us whether they comply or intend to comply with each Guideline or recommendation we issue. If a competent authority does not comply or does not intend to comply it must inform us of the reasons. We decide on a case by case basis whether to publish reasons.

The ESAs endeavour to ensure the accuracy of this document, however, the information is provided by the competent authorities and, as such, the ESAs cannot accept responsibility for its contents or any reliance placed on it.

For further information on the current position of any competent authority, please contact that competent authority. Contact details can be obtained from the ESAs' website ([www.eba.europa.eu](http://www.eba.europa.eu); [www.eiopa.europa.eu](http://www.eiopa.europa.eu); [www.esma.europa.eu](http://www.esma.europa.eu))