

June 04th 2020

NBFIRA 3/3/5-I (36)

To: AML/CFT Compliance Officers / Principal Officers - Non-Bank Financial Institutions
("NBFIs")

Dear Sir/Madam,

**RE: UNITED NATIONS SECURITY COUNCIL RESOLUTIONS- 2368(2017);
1718 (2006); 2127 (2013); 2127 (2013); 2368 (2017); 2368 (2017)**

1. The above matter refers.
2. Botswana has an obligation to support international efforts to prevent, suppress and disrupt money laundering, proliferation of weapons of mass destruction and the financing of terrorism.
3. In furtherance of the above, regulated entities (**referred to as specified parties under the Financial Intelligence Act 2019**) are required to search their databases for any existence, assets, dealings or relationship with the listed entities/individuals from the United Nations Security Council ("UNSC") sanctions lists and report any **positive matches, near matches or no matches** to the **Financial Intelligence Agency (FIA) without delay**.

3.1. Regulated entities are also required to complete and submit the acknowledgment document to the Non-Bank Financial Institutions Regulatory Authority (NBFIRA).

4. The resolutions on listings can be accessed in the below given links of the UNSC website;

- I. Security Council ISIL (Da'esh) and Al-Qaida Sanctions Committee Adds One Entry to Its Sanctions List subject to resolution 2368 (2017) as of May 21 2020,

<https://www.un.org/press/en/2020/sc14195.doc.htm>

- II. Security Council 1718 Sanctions Committee Amends One Entry on Its Sanctions List subject to resolution 1718 (2006) as of May 11 2020,

<https://www.un.org/press/en/2020/sc14182.doc.htm>

- III. Security Council Committee concerning Central African Republic Amends Entry of One Individual on Its Sanctions List subject to resolution 2127 (2013) as of May 5 2020,

<https://www.un.org/press/en/2020/sc14179.doc.htm>

- IV. Security Council Committee concerning Central African Republic Adds One Individual to Its Sanctions List subject to resolution 2127 (2013) as of April 21 2020,

<https://www.un.org/press/en/2020/sc14165.doc.htm>

- V. Security Council ISIL (Da'esh) and Al-Qaida Sanctions Committee Removes One Entry from Its Sanctions List subject to resolution 2368 (2017) as of March 24 2020,

<https://www.un.org/press/en/2020/sc14146.doc.htm>

- VI. Security Council ISIL (Da'esh) and Al-Qaida Sanctions Committee Adds Three Entries to Its Sanctions List subject to resolution 2368 (2017) as of March 4 2020.

<https://www.un.org/press/en/2020/sc14136.doc.htm>

5. Note that all regulated entities are therefore required to immediately search their databases upon receipt of this circular and report accordingly to the Financial Intelligence Agency. **To make these reporting arrangements, entities are kindly advised to contact FIA at: 3998402.**
6. Kindly note that these lists and any that have been disseminated before this one are in full force and effect until the UNSC advises otherwise. Regulated entities are therefore expected to monitor and be on high alert for any future dealings or relationships with the listed entities and/or individuals of all circulars that have been disseminated to date and are responsible to continuously and timeously familiarize themselves with updates made by the UNSC and the Financial Action Task Force ("FATF") in their respective websites.
7. In addition, kindly view the FATF website at <http://www.fatf-gafi.org/countries/#high-risk> for updates on high risk and non-co-operative jurisdictions. Regulated entities are required to apply enhanced due diligence to business relationships and transactions with individuals from high risk and non-co-operative jurisdictions.
8. Regulated entities that provide products or services to the listed individuals, entities and other groups as a result of failing to implement adequate screening measures **not only commit an offence in accordance with section 12 of the Financial Intelligence Act, 2019 but also expose themselves to an extremely high risk of terrorist financing and/or advancing weapons proliferation objectives.**

9. Please find attached an acknowledgement form which must further be filled in by all regulated entities and returned back to NBFIRA immediately upon receipt. For any clarity on the above, kindly contact us at 310 2595 or 368 6100.

Yours faithfully



Mosisi Mongati

Head of Department- AML/CFT

Contact persons; dmoteu@nbfira.org.bw or amlcft@nbfira.org.bw

