





Third party enhanced due diligence.

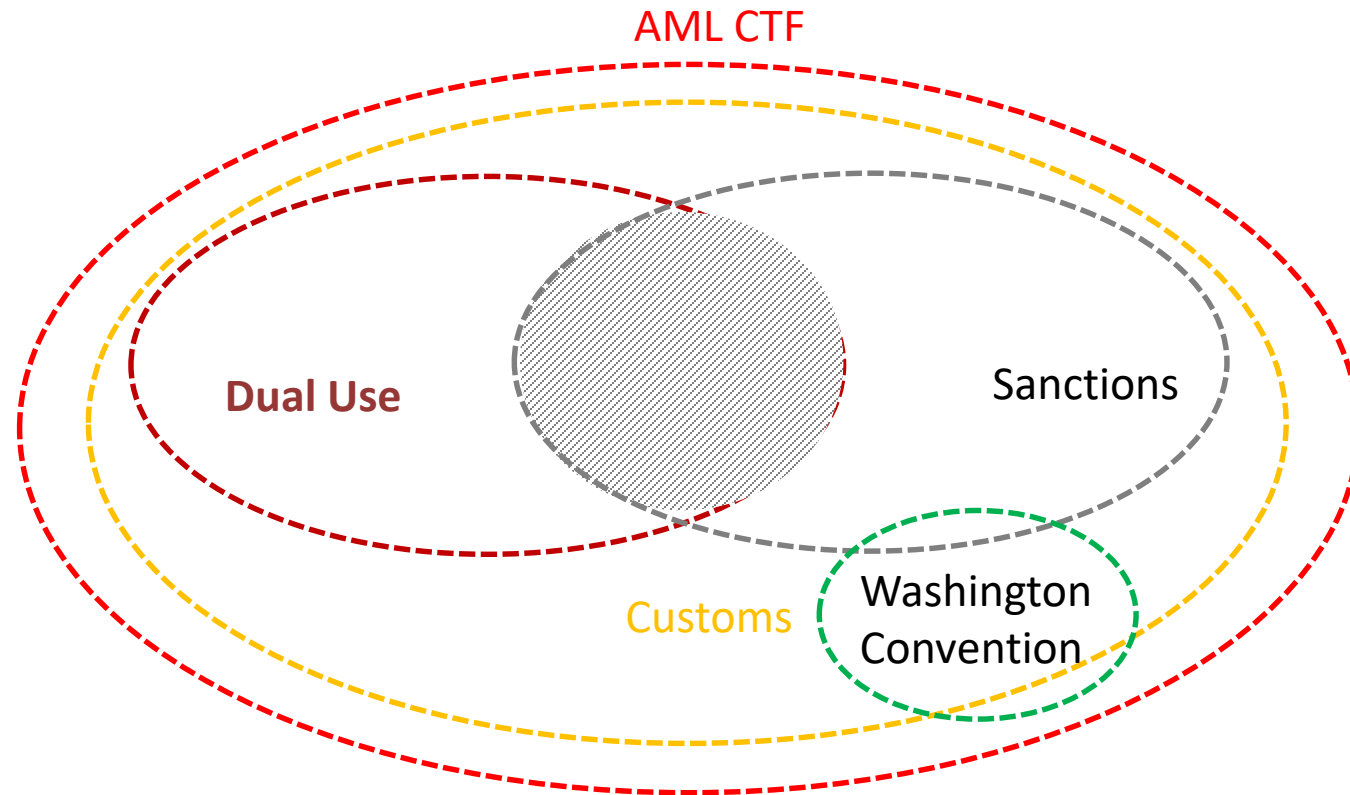
Controparti iraniane e russe

Enhance Due Diligence

**Charles Giacoma – EIFEC**

Milano 23 novembre 2017

# Export Control



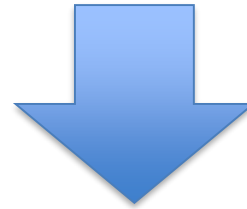


# **Legal framework of sanctions on Iran further to the Joint Comprehensive Plan of Action (JCPOA)**



# **Joint Comprehensive Plan of Action (JCPOA)**

14 luglio 2015



**FAFT GAFI**

**Money Laundering and Terrorist Financing controls**



## FATF/ICRG(2016)27- June 2016, Action Plan

FATF/FSRB Membership: Iran is currently an observer of EAG (June 2016).  
Reasons for initial referral to ICRG: Non-participation in an FSRB (October 2007).  
Date of Mutual Evaluation: The IMF has agreed to conduct Iran's first AML/CFT assessment in the fourth quarter of 2018.

## FATF/ICRG(2017) - 23 June 2017, Extension Action Plan

## FATF/ICRG(2017) – 3<sup>rd</sup> november 2017, Extension Action Plan



# **Enhanced Due Diligence for Higher Risk Countries: Iran**

## **Linee Guida MEF 8 marzo 2017**



***In relazione al risk di riciclaggio e al finanziamento del terrorismo, Iran è ancora considerato a high ML/FT risk country, (Public Statement of FATF-GAFI 5 of 23rd June 2017)***





**Tutte le relazioni commerciali e le transazioni rilevanti con le persone fisiche e giuridiche iraniane devono essere sottoposte a una procedura EDD / KYC.**

**Gli operatori economici e finanziari dell'UE devono operare nel rispetto delle norme stabilite dalle norme nazionali ed EU (4AMLD (EU)2015/849) sull'Antiriciclaggio**



# European Export Compliant Organization

## Enhanced Due Diligence EDD Certification program for Iranian Entities

EU-C/EDD/IRAN  
Post JCPOA &  
AML EU regulation

Release: 2017/CDR028

EIFEC

Russia..



**Sono in discussione con il Governo  
Federale Russo linee guida di  
compliance.**

**Fine 2017**



