



# 18<sup>th</sup> Annual Report

2022



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MENAFATF is of a voluntary and cooperative nature, independent of any other international body or organization, established by virtue of an agreement between the governments of its members, not by virtue of an international treaty. It determines its works, rules, regulations and procedures and cooperates with other international bodies and institutions, especially FATF to achieve its objectives.

For more information about MENAFATF, please visit the website: <http://www.menafatf.org/>

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## MENAFATF President Foreword



**In the Name of Allah, the Most Compassionate, Most Merciful,**

**Greetings,**

In the beginning of the 18<sup>th</sup> Annual Report of the MENAFATF 2022, I would like to welcome you all, and I ask Allah the Almighty to keep us all in good health and protect our well-being. I would also like to extend my thanks to the member countries of MENAFATF for their confidence in the Kingdom of Morocco to take leadership of MENAFATF for the year 2022, in which the Kingdom of Morocco continued the path of developing MENAFATF. The continuous cumulative work should respond to a clear strategic vision to achieve effectiveness and conserve resources. The Kingdom of Morocco followed the approach of the previous presidents of MENAFATF, especially during the past two years in which the Arab Republic of Egypt took the helm of the Presidency in light of the serious challenges facing the MENAFATF. The Kingdom had the honor of accompanying it in the position of Vice-President.

To solidify the foundations of MENAFATF on the path of continuous development, the Kingdom of Morocco has placed at the top of its priorities in the Presidency of the MENAFATF during 2022, stabilizing and strengthening the foundations of governance in the MENAFATF, and maintaining the outcomes of the action plan implemented by the MENAFATF with the FATF. The Kingdom worked to implement this axis through a number of measures, such as ensuring the existence of a structure specialized in governance within the structure of the MENAFATF secretariat, supporting human resources in the Secretariat, and setting up a professional path for employees that provides them with continuous training. On the other hand, the formation of MENAFATF's Advisory Committee was reviewed by including the outgoing President to its membership to ensure the smooth flow of strategic plans and work plans as well as other measures. Efforts have been made in this regard to follow up on countries' contributions to the group's budget, as the mechanism approved by the 34<sup>th</sup> meeting chaired by the Kingdom of Morocco has been activated, represented in taking gradual measures against the countries that are lagging behind in fulfilling their financial obligations in the group's budget.

The Kingdom has also focused on relationships with international and regional partners and FSRBs by developing a communication policy that effectively supports the goals of MENAFATF's strategic plan. In this context, the Kingdom has also worked to strengthen MENAFATF's role in various international activities and forums, giving these participations utmost importance, especially focusing on some entities such as the FATF, the Egmont Group and other international partners. In this regard, the Kingdom will seek to implement the recommendations of Rabat 2018, which were adopted by the MENAFATF on the sidelines of the Typologies workshop hosted by the Kingdom in 2018, which urges extending channels of communication and coordination with FSRBs, strengthening partnership with observers, and encouraging member countries to participate effectively in projects of relevant interest.

In a related context, and pursuant to the principles of the memorandum of understanding in the preamble paragraph, which stipulated that the countries of the Middle East and North Africa region should work jointly to adhere to international standards related to combating money laundering and terrorist financing with the aim of establishing an effective system that countries must implement. Objectives of the group "Joint work to identify issues related to money laundering and terrorist financing of a regional nature, exchange experiences in this regard and develop solutions to deal with them. Participation in planning and cooperation In this context, a workshop dedicated to the topic of evaluation was organized to participate in joint projects between the Kingdom of Morocco and the Commercial Office, on the sidelines of the 35<sup>th</sup> plenary meeting of the group, which was hosted by the Kingdom of Morocco on November 24 and 25, 2022.

The launch of this structuring project comes to strengthen the role of the group within the efforts of the international community to identify the risks of money laundering, financing of terrorism, and financing of proliferation, and thus the group will be one of the few groups that initiated the regional risk assessment to contribute to the strategic vision of the global network, which stipulates: "The regional counterpart groups are working on understand regional risks, challenges, and operational needs and proactively contribute these perspectives to the FATF's operations.."

In line with the group's and its respective working group's work plans, the Presidency of the Kingdom of Morocco set thematic priorities within the framework of keeping abreast of regional and international developments. Thus, some issues gained special importance, such as studying the issue of virtual assets and applying the requirements of Recommendation 15 of the FATF recommendations. The plenary meeting also approved the proposal of the Technical Assistance and Applications Team to download the priority of the presidency to update the endowment study that the group made in 2015, and to enhance cooperation between the financial information units of the group and the authorities charged with combating corruption, in addition to many other issues.

On the other hand, the international community is facing great challenges in combating the growth of money laundering and terrorist financing crimes, at a time when these crimes are taking new forms through which they are trying to overcome and circumvent the methods and means used in combating organized crime patterns, which has become imperative for the group to work continuously. To urge and assist member states in raising the level of their commitment to international standards for combating money laundering and terrorist financing, updating their legislative and legal system, and increasing regional and international coordination and cooperation. For the sake of these requirements, the Presidency has placed among its priorities the issue of improving the mutual evaluation and its subsequent follow-up processes and increasing the quality of the reports issued by them. In this regard, it should be noted that the plenary meeting of the Financial Action Group for the month of October 2022 approved the first follow-up report on the plan to increase the effectiveness of the MENAFATF group, and this showed the report made positive progress. Thus, the general meeting of the Financial Action Task Force called on the MENAFATF to enhance countries' readiness for the mutual evaluation process and support the secretariat's experience and awareness of combating money laundering and terrorist financing. The report and the recommendations of the Financial Action Task Force were reviewed at the thirty-fifth general meeting held in Rabat, Kingdom of Morocco, in November 2022.

Thus, the year 2022 was marked by the mobilization of the Group's resources for the success of the mutual evaluation processes that were initiated, on an exceptional basis, with regard to a number of countries (Lebanon, Palestine, Algeria, Qatar, Sudan, Iraq) in addition to continuing the follow-up process of nine previously evaluated countries, two of which are in First round frame.

Despite these challenges, the group did not hesitate to continue its efforts and take the necessary measures for the success of the evaluation and follow-up processes, while respecting the set timetable, as well as providing two training courses during the year 2022 on international standards and two training courses for residents. In addition to improving the quality and consistency of reports and their translation, which necessitated resorting to the services of experts, external translators, and a translation office to carry out the revision. Also, the Presidency was keen to hold high-level meetings with countries coming to the evaluation process to keep pace with their readiness and facilitate the evaluation process.

Several measures have also been implemented in this regard, such as strengthening the group's role in supporting the countries subject to assessment and accompanying them in the process of exiting the follow-up process and developing a policy for providing assessors experts and proposing a pool of assessment experts. In the same field, the year 2022 saw the opening of workshops to review and update the group's procedures for mutual evaluation and follow-up, which required the mutual evaluation team to hold a special meeting to discuss this issue. The project for updating the procedures was presented and discussed at the 35<sup>th</sup> plenary meeting of the group, which was held in Rabat, Kingdom of Morocco, in November 2022.

Thus, the group is committed to its role in affirming the commitment of member states to international standards in the matter of combating money laundering, financing terrorism and proliferation, and carrying out mutual evaluation processes for the second round in which the group has completed important stages, and the group is proceeding with determination and determination to complete this round successfully and benefit from the lessons that can be drawn. this process in preparation for the next round.

In conclusion, the Kingdom of Morocco, as was the case with the Presidency of the Republic of Egypt that preceded it, has put its mark on the work of the group and contributed to the course of improving the performance and effectiveness of the group. We are certain that the Mauritanian Republic and the subsequent presidents of the group will continue the same endeavors with success.

**With all due respect**

**Dr. Jawhar Al-Nafisi,**

**President of the MENAFATF,**

**President of the Moroccan National Financial Intelligence Authority-ANRF.**



## Executive Secretary Foreword



**In the Name of Allah, the Most Grateful, Most Merciful,**

**Ladies and Gentlemen!**

I am pleased to see you at the beginning of the MENAFATF eighteenth annual report. I also would like to thank, in particular, the MENAFATF Presidency represented by His Excellency Dr. Jawhar Al-Nafisi, President of the MENAFATF, President of the Moroccan National Financial Intelligence Authority-ANRF for the continuous support.

The year 2022 witnessed an extensive work in terms of MENAFATF works field, especially in terms of exchanging experiences and cooperation with countries, international bodies and FSRBs concerned with AML/CFT/CPF, through participation in various meetings and forum. Within the framework of the relationship with FATF, MENAFATF participated in a number of joint activities therewith, including attending plenaries and working groups meetings during 2022.

In the areas of ME, MENAFATF has started a number of mutual evaluations for member countries of MENAFATF, which include the Republic of Sudan, the State of Palestine, the State of Qatar, the Lebanese Republic, and the People's Democratic Republic of Algeria, and the Republic of Iraq. MENAFATF also held a number of training courses in the field of preparing the assessed countries, to introduce the concerned authorities to the ME process for the assessed countries.

In the field of Technical Assistance and Typologies, the MENAFATF Secretariat has endeavored to provide a variety of facilitations in this field, including the execution of a number of training programs within the MENAFATF's training plan for 2022, in coordination with donors and related organizations, as it dealt with a number of important topics such as "Asset recovery channels", "Countering the financing of proliferation of weapons of mass destruction", "Strategic analysis", "Risk-based approach" and other topics that can be explored in detail in Section III of this report.

In another context, the MENAFATF secretariat sought to identify and provide the needs of member countries for technical assistance during 2022, through the matrix adopted in this regard after being updated by 11 member countries. Many donors and technical support program providers have expressed the support and assistance of the MENAFATF's secretariat in meeting the needs of member countries for technical assistance and training in the field of AML/CFT/CPF. Other entities continue to consult with the MENAFATF secretariat to meet other requirements that will be coordinated and implemented upon reaching an agreement with countries wishing to obtain technical assistance programs.

In the field of research and typologies, MENAFATF adopted in 2022 the typologies report on "Abuse of NPOs in TF activities". MENAFATF also adopted the implementation of a new typologies project on "AML through legal persons and legal arrangements in the MENA region." As well as updating the endowment study previously issued by the MENAFATF.

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On the other hand, MENAFATF organized the 34<sup>th</sup> Plenary in May 2022, and the 35<sup>th</sup> Plenary in November 2022. These meetings were also accompanied by a number of working groups meetings, as well as many events and presentations.

In conclusion, I hope that we have succeeded in reflecting some of the efforts and achievements made by MENAFATF during 2022, and that the content of this report will meet your satisfactions. I also would like to extend my thanks to all my colleagues working in the Secretariat for their efforts and to all member countries and observers for their support and continuous cooperation, Wishing everyone all the best and success.

**Peace be upon you, Allah's Mercy and His Blessings.**

**Suliman Al-Jabrin**

**MENAFATF Executive Secretary**

## Section One: Overview of MENAFATF

### Overview of MENAFATF and its objectives

Given the severe negative effects of ML/TF crimes on the stability of the financial and economic system of any country or region in the world, in 2003, the idea of establishing a regional group for the Middle East and North Africa region was proposed to combat money laundering and terrorist financing, similar to the Financial Action Task Force (FATF). On November 30, 2004, in the city of Manama, capital of the Kingdom of Bahrain, the governments of 14 Arab countries decided in a ministerial meeting to establish that (group) MENAFATF, and it was called the "Middle East and North Africa Financial Action Task Force" (MENAFATF), with the aim of continuously seeking to implement and disseminate relevant international policies and standards, and enhance its effective compliance, especially the recommendations issued by the FATF and relevant UN Security Council resolutions. Five more countries have subsequently joined the MENAFATF. All member countries signed a Memorandum of Understanding, which represented a historic achievement for the Arab Countries, given that it shows their seriousness in facing all the risks that result from ML/TF operations.

The Kingdom of Bahrain hosts the headquarters of the MENAFATF Secretariat since it became operational, and provided it with all necessary resources in this regard. To confirm the importance of MENAFATF role, the headquarters agreement was signed between the Kingdom of Bahrain and MENAFATF and approved by the Consultative Council and the Parliament; His Majesty the King of Bahrain, Hamad Bin Isa Al Khalifa, promulgated Law No. (5) of 2009 to ratify the agreement on 26 March 2009; and it was published in the official Gazette on 2 April 2009.

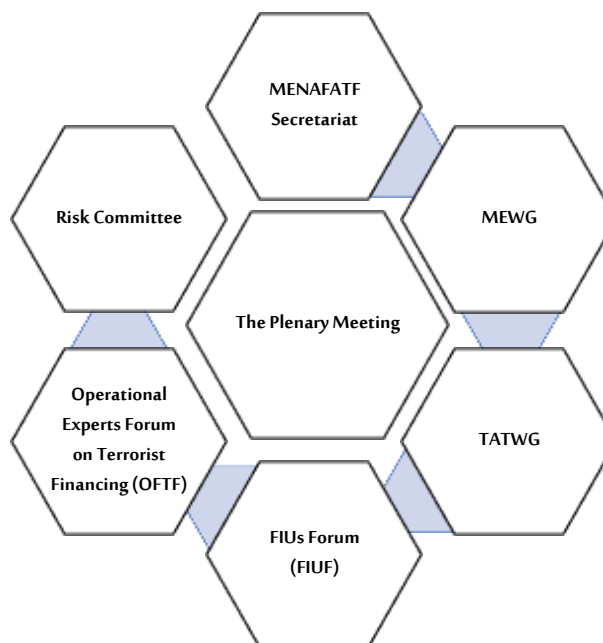
### MENAFATF Objectives

- **To adopt and implement the FATF 40 Recommendations on combating money laundering and financing of terrorism and proliferation.**
- **To implement the relevant UN treaties and agreements and United Nations Security Council Resolutions**
- **To cooperate with each other to raise compliance with these standards within the MENA Region and to cooperate with other international and regional organizations, institutions, and agencies to improve compliance worldwide.**
- **To work jointly to identify issues of regional nature related to money laundering and terrorist financing, and to share relevant experiences and to develop solutions for dealing with them.**
- **To take measures throughout the region to effectively combat money laundering and terrorist financing in a way that does not contradict with the cultural values, constitutional frameworks, and legal systems in the member countries.**

## MENAFATF Structure

The **Plenary Meeting** is the body in charge of taking decisions within MENAFATF. It is composed of representatives from member countries, who are experienced in the AML/CFT fields.

The **MENAFATF Secretariat** is responsible for executing the technical and administrative functions in order to carry out the activities of the MENAFATF, such as coordinating the mutual evaluation processes and cooperating with international and counterpart authorities, especially the FATF, in addition to other tasks as decided by the Plenary Meeting.



The **Mutual Evaluation Working Group (“MEWG”)** is formed with the aim of preparing and organizing the mutual evaluation program for member countries, developing the procedures, working on qualifying and training assessors and following up the international developments in this regard.

The **Technical Assistance and Typologies Working Group (TATWG)** is formed and is mandated to execute the typologies programs and projects, identify the needs of member countries in terms of technical assistance, training and coordination for the provision of such assistance, and follow up the latest global developments with a view to benefiting from them in improving the AML/CFT regimes in the region.

The **FIUs Forum (FIUF)** is the communication channel and mechanism between FIUs of member countries. It aims at promoting regional cooperation and exchange of expertise among them. The Forum is convened on the margin of the MENAFATF plenary meetings and when necessary; the MENAFATF Secretariat acts as the coordinator of the Forum.

In addition, the **Operational Experts Forum on Terrorist Financing (“OFTF”)** is formed to discuss operational matters, monitor the developments, and consider the pertinent subjects on an ongoing basis, while making recommendations in their regard to the plenary meeting. The forum is held on the margin of the MENAFATF Plenaries and when necessary; the MENAFATF Secretariat acts as the coordinator of the Forum.

The **Risk Committee (“RC”)** is also formed and works under the Technical Assistance and Typologies Working Group. It is charged with discussing the subject of national risk assessment and exchanging expertise and best practices in this regard. The membership of the committee is open to the experts in the field of ML/TF/PF risk assessment from all member countries, observers, and regional financial action task forces, who fulfill the educational qualifications and have the work experience









in the national risk assessment field. The Committee holds its meetings on the margin of the MENAFATF plenary meetings and whenever it deems it necessary; the MENAFATF Secretariat acts as the coordinator of the RC.

### Member Countries and Observers of MENAFATF












The MENAFATF's membership currently includes 21 Arab countries, in addition to 18 countries and international organizations that occupy observer seats in the MENAFATF, and this reflects the extent of interest in the MENAFATF's activities and work. The MENAFATF has been an Associate Member of the FATF since 2007 and holds the observer status on a reciprocal basis with: The Egmont Group of Financial Intelligence Units (EGMONT), the Asia/Pacific Group on Money Laundering (APG), and the Eurasian Group (EAG).

The table below shows the member countries and observers at the MENAFATF:

#### Member countries

			
Hashemite Kingdom of Jordan	United Arab Emirates	Kingdom of Bahrain	Republic of Tunisia
			
People's Democratic Republic of Algeria	Republic of Djibouti	Kingdom of Saudi Arabia	Republic of Sudan
			
Syrian Arab Republic	Federal Republic of Somalia	Republic of Iraq	Sultanate of Oman
			
State of Palestine	State of Qatar	State of Kuwait	The Lebanese Republic
			
State of Libya	Arab Republic of Egypt	Kingdom of Morocco	The Islamic Republic of Mauritania
			
Republic of Yemen			

Observers

			
Republic of France	United Kingdom of Great Britain and Northern Ireland	United States of America	Kingdom of Spain
			 <b>THE WORLD BANK</b> World Bank
Australia	Federal Republic of Germany	International Monetary Fund	
			
Co-operation Council for the Arab States of Gulf	Financial Action Task Force	Egmont Group of Financial Intelligence Units	Asia/Pacific Group on Money Laundering
			
World Customs Organization	Arab Monetary Fund	Eurasian Group on combating money laundering and financing of terrorism	United Nations
			
European Commission	Russian Federation		

- FOR MORE INFORMATION PLEASE VISIT THE OFFICIAL WEBSITE OF THE MENAFATF: [www.menafatf.org](http://www.menafatf.org).

## Section Two: Regional and International Coordination and Cooperation

Regional and international cooperation plays an important role in AML/CFT/CPF, as the MENAFATF works to achieve its goals through its coordinative role within the framework of cooperation between member countries to enhance compliance with the international standards issued by FATF in AML/CFT/CPF in the Middle East and North Africa, and cooperating with other regional and international organizations, institutions and bodies to promote compliance with these standards internationally, as well as through joint work to identify issues related to ML/TF/PF of a regional nature, and exchange experiences in this regard and developing solutions to deal therewith, and reviewing the latest developments in AML/CFT/CPF, which helps transfer expertise and knowledge and exchange experiences, which would strengthen the legislative and procedural tools of countries and improve AML/CFT/CPF systems and strengthen the countries' legislative and procedural tools.

Meetings, joint meetings and other forms of regional and international coordination and cooperation between the parties related to the MENAFATF system and its areas of work, are a real opportunity to achieve communication at the regional and international levels. In this regard, the MENAFATF held, during 2022, many periodic meetings and joint meetings, the following are the most important outputs and what transpired therein:

### First: MENAFATF Plenary Meetings and Working Groups Meetings during 2022:

#### 34<sup>th</sup> Plenary Meeting

MENAFATF 34<sup>th</sup> Plenary was held over two days 24-25 May 2022 in Manama, Kingdom of Bahrain, chaired by His Excellency Dr. Jawhar Al-Nafisi, MENAFATF President and President of the Moroccan National Financial Intelligence Authority-ANRF, and His Excellency Dr. Mohamed El Amine El Dahabi, MENAFATF Vice President, Governor of the Central Bank of Mauritania, member countries, in addition to experts from observer countries and international bodies concerned with AML/CFT/CPF, led by the Financial Action Task Force ("FATF"), the United Nations ("UN"), the International Monetary Fund ("IMF") and Egmont Group.

In the Plenary, many AML/CFT experts from member countries and observers had attended as it was a real opportunity to strengthen and unify regional and international efforts led by the MENAFATF concerning anti-money laundering, combating terrorist financing and proliferation financing and to protect the economic, social and political systems in the region from the risks of such crimes. Where a number of issues related to the MENAFATF work were discussed, such as financial and administrative affairs, and issues related to managing the MENAFATF's affairs in terms of issues related to its work and its relations with counterparts and similar entities, especially the FATF.

Over the course of two days, the plenary discussed a number of topics related to evaluation and follow-up processes, as Jordan's 2<sup>nd</sup> EFUR was discussed and approved with a request to re-rate some TC rating, as well as Bahrain's and Morocco's 3<sup>rd</sup> EFUR with a TC re-rating request, in addition to UAE's 2<sup>nd</sup> EFUR and Egypt's 1<sup>st</sup> EFUR without TC re-rating requests. The report of each country clarified the efforts taken to address the shortcomings by implementing the

recommended actions contained in MERs. The timetable for the follow-up process for the first round and the timetable for the follow-up process for the second round were also approved, in addition to discussing other working papers related to the work group's work.

The Plenary also discussed areas of technical assistance and training, including workshops and training programs on topics related to the MENAFATF's fields of work, the plan for training programs and webinars of 2022. The Plenary adopted the workplan for training programs and webinars for the MENAFATF, and urged countries to host the events included therein, and urged observers to participate in their implementation. The Plenary also listened an update regarding the matrix of technical assistance and training and urged donors to meet these needs and for countries to continue updating the matrix. The existing joint work was also discussed for some issues related to ML/TF operations of a regional nature, such as the typologies project that is currently being implemented regarding the abuse of NPOs in TF activities, the exchange of experiences in this regard, the development of solutions to deal therewith, and the dissemination of awareness of TF risks, and the plenary also listened to report on the progress of work in the project and urge countries to actively participate in the project by responding to the information request questionnaire and providing more information and case studies.

The plenary also dealt with the reports of a number of MENAFATF's work groups, including the Risk Committee and the Financial Information Unit Forum, and reviewed their most important work through the co-chairs reports that were presented to the meeting by the co-chairs of these groups.

### 39<sup>th</sup> Mutual Evaluation Working Group Meeting

The Mutual Evaluation Working Group (MWE) held its 39<sup>th</sup> meeting on the margins of the 34<sup>th</sup> Plenary during 15-16 May 2022, where the MWEG discussed a number of important issues, including the third EFUR for the Kingdom of Morocco, the second EFUR for the Hashemite Kingdom of Jordan and the third EFUR for the Kingdom of Bahrain (which included a TC re-rating request). The timeline of the mutual evaluation process in the framework of the second round, and the timeline of the follow-up process in the framework of the first and second rounds had also been adopted. The latest developments in international standards, the TC methodology with the recommendations of the FATF and the effectiveness of AML/CFT systems were also presented, and the update of the MENAFATF's procedures for ME and FU processes was discussed, and the provision of experts of assessors and reviewers for ME and FU processes. An update was also presented on the existing ME processes for the People's Democratic Republic of Algeria, the Lebanese Republic, the State of Palestine, the State of Qatar, the Republic of Sudan and the Republic of Iraq, and the joint mutual evaluation processes with the FATF for the State of Kuwait and the Sultanate of Oman.

### 33<sup>rd</sup> Technical Assistant and Typologies Working Group

The 33<sup>rd</sup> Technical Assistant and Typologies Working Group (TATWG) meeting was held on Thursday, 19 May 2022, on the sidelines of the MENAFATF 34<sup>th</sup> plenary, and discussed a number of important topics, including the typologies project on Abuse of NPOs in TF activities. In the field of technical assistance, the meeting discussed the plan for training



programs and webinars for 2022, the progress of work towards their completion and implementation in coordination with donor countries and agencies. The group also reviewed the progress of work on the MENAFATF's e-learning platform project, the steps taken and issued a number of decisions in this regard. The matrix of technical assistance and training in the field of AML/CFT/CPF was presented after the MENAFATF's secretariat monitored the needs of member countries and coordinated with donors and observers in this regard.

At the end of the meeting, the group deliberated on activating the priorities of the Presidency in terms of completing a regional assessment of the risks of money laundering and terrorist financing due to its importance in achieving benefit and enriching the experience of other countries, in addition to updating the endowment study that the MENAFATF carried out in 2015 in line with Recommendation 25 and the amendments that have occurred thereto in addition to other matters, in order to draw a clear strategic priority in order to achieve the effectiveness of the MENAFATF's countries.

#### **The 14<sup>th</sup> meeting of the Risk Committee**

The Risk Committee held its 14<sup>th</sup> meeting on Tuesday, 17 May 2022, virtually, on the margins of the MENAFATF 34<sup>th</sup> plenary, where the meeting discussed number of important topics related to the understanding, identification and assessing risks. The meeting reviewed the report on the challenges facing member countries in ML/TF/PF risks and put forward recommendations that would address and confront these challenges. Discussion of technical assistance, training and awareness-raising programs presented in areas of risks during the current year, in cooperation and coordination with the MENAFATF's TATWG. The meeting also included the establishment of a panel on the evaluation of R.1 and IO.1 and invited regional and international experts to speak and discuss related issues, in addition to making presentations in the various areas of risk by the member countries of the MENAFATF, donors and relevant organizations.

#### **The 22<sup>nd</sup> meeting for the FIU's Forum**

The FIU Forum held its 22<sup>nd</sup> meeting on Wednesday, 18 May 2022. During its sessions, it discussed a number of important topics, including following up on the accession and cooperation of FIUs to the Egmont Group, recommending studying the obstacles that cause delays in the joining process, and the best ways to overcome them and exchange experiences from the best case studies and mechanisms for building and enhancing the capabilities of FIUs. The Forum also discussed the progress of FIUs to complete membership procedures in the Egmont Group. The Forum also discussed modern financial technologies and their importance in the work of FIUs, and reviewed experiences and lessons learned from them. The proposal on developing the FIU's Forum was also discussed.

#### **35<sup>th</sup> Plenary Meeting**

The MENAFATF 35<sup>th</sup> plenary was held on 24 and 25 November 2022 in Rabat, Kingdom of Morocco, where it was opened with a foreword by Her Excellency Ms. Nadia Fattah, Minister of Economy and Finance in the Kingdom of

Morocco, and His Excellency Dr. Jawhar Al-Nafisi, President of MENAFATF, and President of the Moroccan National Financial Intelligence Authority-ANRF, and His Excellency Mr. Suliman Aljabrin, MENAFATF Executive Secretary.

His Excellency Dr. Jawhar Al-Nafisi, President of MENAFATF, and President of the Moroccan National Financial Intelligence Authority-ANRF presided over the Plenary, which was attended by heads of delegations, AML/CFT/CPF experts from member countries, in addition to experts from countries and international observers of the MENAFATF, namely the FATF, the UN, the IMF and the Egmont Group.

A number of working papers were discussed, including the amended ME and FU procedures paper, the MENAFATF action plan for 2023, the plan for training programs and webinars for 2023, and the typologies project on the abuse of NPOs in TF activities, and the start of a new typologies project on ML/TF through legal persons and legal arrangements. The priorities of the presidency of the Islamic Republic of Mauritania for the MENAFATF for 2023 were also approved, and the Republic of Yemen assumed the position of vice president of the MENAFATF for 2023.

It also reviewed a number of working papers related to ME, including the revised procedures for ME and FU processes, in addition to discussing and approving a statistical paper on the provision of experts for ME and FU processes. It also adopted the timeline of the 1<sup>st</sup> and 2<sup>nd</sup> round follow-up processes.

The most important achievements of the MENAFATF in the field of technical assistance and typologies from workshops and training programs on various topics, training programs and webinars mentioned in the training plan for 2023 and other future projects were also reviewed. And in the fields of typologies, approving the typologies project report on the abuse of NPOs in TF activities, and execution of a new typologies project on ML/TF through legal persons and legal arrangements in the MENA region.

The Plenary also dealt with the reports of a number of the MENAFATF's work groups, including the RC and the FIU Forum, and reviewed their most important work through the co-chairs reports that were presented to the meeting by the co-chairs of these groups.

#### 40<sup>th</sup> MEWG Meeting

The MEWG's 40<sup>th</sup> meeting was held on the margins of the MENAFATF 35th plenary on 17 November 2022. It discussed a number of important issues, including reviewing the procedures paper for the second round of the mutual evaluation process and the follow-up process. As well as updating the statistic paper on providing experts assessors and reviewers for the second round of ME and follow-up processes As well as the timeline for the ME process within the framework of the second round, whereby an update was also presented on the existing ME processes for the People's Democratic Republic of Algeria, the Lebanese Republic, the State of Palestine, the State of Qatar, the Republic of Sudan and the Republic of Iraq, and the joint mutual evaluation processes with the FATF for the State of Kuwait and the Sultanate of Oman.

### THE 34<sup>th</sup> TATWG Meeting

TATWG 34<sup>th</sup> meeting was held on the sidelines of the 35<sup>th</sup> Plenary of the MENAFATF on 16 November 2022. The TATWG reviewed the latest final draft of the typologies project report on "abuse of NPOs in TF activities", and the new typologies project on "ML/TF through legal persons and legal arrangements", and the start of the 5th edition of the MENAFATF periodic typologies report and the importance of case studies to contribute to the good output of the project. The plan for the training programs, the webinars for 2022, and the status of the implementation of the programs included therein were also reviewed. The MENAFATF e-learning platform project was also reviewed.

### The 15<sup>th</sup> meeting of the Risk Committee

The 15<sup>th</sup> meeting of the Risk Committee was held on 13 November 2022, during which discussion on technical assistance and training program in the field of risks was held, and a panel with a number of experts in the region on the application of the risk-based approach with relation to new technologies. There were also participations of a number of presentations from member countries and international organizations that aim to share knowledge among the MENAFATF countries and review the FATF guidance on the risk-based approach to real estate sector. It also urged member countries to apply the requirements of the risk-based approach as per the requirements of Recommendation 15, and to follow up on emerging risks.

### The 23<sup>rd</sup> meeting for the FIU's Forum

The FIUs Forum held its 23<sup>rd</sup> meeting on 11 November 2022, in the presence of the Executive Secretary of the Egmont Group, who emphasized his support for the FIUs from the MENAFATF countries that are not members of the Egmont Group and the most important steps taken to join, overcome difficulties and facilitate their joining the Group. Experiences of a number of member countries also were reviewed in the forum and the exchange of experiences and best practices on "enhancing cooperation between FIUs and the national bodies entrusted with fighting corruption". The first version of which was launched on the sidelines of the forum.

### 8<sup>th</sup> OTF meeting

OTF Forum held its 8<sup>th</sup> meeting on 15 November 2022, where the meeting dealt with the forum's work plan for 2023 and was presented by the UNODC on topics of concern to risks, methods, trends, challenges, and best practices in detecting and preventing terrorist financing operations, as well as experiences were exchanged during this meeting in the fields of parallel financial investigation with regard to terrorist financing crimes.

### Second: Coordination and cooperation with the FATF and FSRBs during 2022:

The Group is making great efforts at the regional and international levels in order to improve working relations in AML/CFT/CPF through participation and contribution in activities and events, and coordination and communication with the FATF, FSRBs, and other regional and international bodies, where these relations have witnessed a development notable at the regional and international levels during 2022, in particular with some of them such as the FATF, Egmont

Group and its Leadership Center, the United Nations with its specialized departments and other bodies, as well as communication with countries and donors to provide technical assistance and training to member countries of the MENAFATF. Below we review the most important features and activities undertaken by the MENAFATF as mentioned above in this part of the report:

### Coordination and Cooperation with FATF

During 2022, the MENAFATF participated in many joint events with the FATF, which included plenary meetings and work groups meetings, workshops and training programs, and onsite visits for mutual evaluations. The MENAFATF's participation was as follows:

1. The FATF Plenary and working groups meetings, which were held three times during 2022.
2. The virtual meeting of the AGSR, during the period from 25-26 January 2022.
3. The MENAFATF Secretariat, in coordination with the FATF, organized a workshop on international standards issued by the FATF, which was held twice, from 8-12 May 2022, and the other from 26 September to 6 October 2022.
4. The MENAFATF secretariat organized, in coordination with the FATF, the joint workshop for training and qualifying assessors, which was held twice, from 23 May to 2 June 2022, and the other in cooperation with the IMF, which was held on 25-29 September 2022.
5. The MENAFATF secretariat hosted the joint workshop between the FATF and FSRBs during the period 26-30 June 2022.
6. The Round Table of the FATF and the Interpol during the period 12-13 September 2022.

### Coordination And Cooperation with The International Organizations

1. The Plenary Meeting and meetings of the working groups of the Egmont Group during the period from 10 -15 July 2022.
2. Webinar on "Managing Sanctions Risks" in cooperation with the International Compliance Association, on 27 June 2022.
3. Panel on the risks of abusing new technologies in ML crimes (VAs, NFTs, Stablecoin and others) - in cooperation with Egmont Group during 6-7 September 2022.
4. A webinar on enhancing transparency about the BOs, in cooperation with the GIZ, during the period 30-31 October 2022.
5. The OFTF meeting on launching the regional assessment project for money laundering and terrorist financing risks, in cooperation with the United Nations Center for Combating Terrorism, which was held on 23 November 2022.
6. The workshop on international cooperation and the mechanism for preparing MLA requests, freezing, confiscation and asset recovery in cooperation with the United Nations Office on Drugs and Crime and GIZ during 3-5 December 2022.

7. The regional conference organized by the UNODC during the period 4-6 September 2022.
8. A workshop on the risk-based approach to financial institutions and DNFBPs, in cooperation with the United Nations Office on Drugs and Crime and IMF, during 13-15 December 2022.

#### Other Regional and International Participations for MENAFATF During 2022

1. The 22<sup>nd</sup> meeting of the regional working group to enhance financial inclusion in the Arab countries of the AMF, during the period 26-27 January 2022.
2. The 13<sup>th</sup> regional conference on compliance and AML organized by the Saudi Central Bank in Riyadh, Kingdom of Saudi Arabia, on 30 January 2022.
3. A workshop on “Targeted Financial Sanctions related to the Financing of Terrorism, the Financing of Proliferation and the use of Virtual Assets” at the invitation of the Secretariat General of the Gulf Cooperation Council, which was held in Dubai, United Arab Emirates, from 16-17 February 2022.
4. The AML in the 21<sup>st</sup> century workshop at the invitation of the United States of America’s government, which was held in Manama, Kingdom of Bahrain, during the period 13-15 March 2022.
5. The workshop on Strengthening judicial cooperation in the Middle East and North Africa: Judges and prosecutors are at the forefront of AML/CFT, which was organized by the Siracusa International Institute, during the period 22-24 March 2022.
6. Coordination meeting between FSRBs and GIZ during the period 17-20 June 2022.
7. The Regional Conference on Combating Money Laundering and the Financing of Terrorism organized by the European Council during the period from 22 - 23 June 2022.
8. The 46<sup>th</sup> session of the Council of Governors of Arab Central Banks and Monetary Institutions on 18 September 2022.
9. The 14<sup>th</sup> MENA Risk Summit for the Middle East and North Africa region organized by the Executive Office of Anti Money Laundering and Counter Terrorism Financing in the United Arab Emirates on 25 October 2022.
10. A workshop to rebuild confidence in the Yemeni banking sector organized by the European Commission during the period 26-28 October 2022.

## Section Three: Building and Enhancing AML/CFT/CPF Frameworks

### in the Middle East and North Africa Region

The MENAFATF is striving to build robust and effective frameworks for anti-money laundering, terrorist financing and financing of proliferation in the region, according to the objectives set forth in the Memorandum of Understanding. The MENAFATF is, therefore, pursuing several important steps in this endeavor, the most important of which is following up on the commitment of countries to the implementation of the international standards through mutual evaluations and all types of follow-up processes which follow the mutual evaluation.

The MENAFATF also identifies topics of a regional nature related to money laundering, terrorist financing and proliferation financing through typologies projects, finding the best solutions to combat them, and spreading awareness about the methods and trends of money laundering, terrorist financing and proliferation financing and related typologies. In this context, seeking to activate joint cooperation and exchange experiences with FSRBs and international organizations.

In addition to studying the typologies topics, there is a special importance for technical assistance and training in supporting and assisting the MENAFATF countries at the regional or national level in raising the level of their compliance with international requirements and in order to build and strengthen the capacities of the relevant authorities and institutions. The most important technical assistance tools may include reviewing and drafting legislation, holding workshops to raise awareness, train and guide relevant employees, build the capacities of the concerned authorities, and issue publications and specialized guidance.

The technical assistance also covers basic topics in AML/CFT/CPF with the aim of strengthening the combating operations, for example: assessing risks, developing national AML/CFT/CPF strategies, strengthening legislation and the work of existing institutions in AML/CFT/CPF, and raising the capacity and efficiency of FIUs, supervisory bodies, and actors of criminal justice.

Based on the foregoing, we review below the most important events and developments at the MENAFATF level in this regard during 2022, in mutual evaluation, technical assistance and typologies:

#### First: On Mutual Evaluation:

##### Assessment and Follow-Up of the MENAFATF Member Countries

Based on the MENAFATF Procedures and by virtue of the 2012 FATF international standards and the 2013 Methodology, the MENAFATF conducts the mutual evaluation process to assess the anti-money laundering and countering the financing of terrorism and proliferation regime of member countries, in respect of their technical compliance with the Forty Recommendations and effectiveness of their systems. 2020 witnessed the adoption of the UAE's report, the continuation of evaluating Egypt and the commencement of Palestine's evaluation as indicated above.

With regards to the (regular and enhanced) follow-up process, the MENAFATF monitors the progress made by member countries to verify that their AML/CFT systems are being developed continuously, to encourage and urge them to address the deficiencies set out in the MER, and to take the necessary actions within reasonable periods of time in order to execute the priority actions and recommendations set out in the said report.

During 2022, the plenary adopted seven reports under the enhanced follow-up process, namely: Three EFURs (with a TC re-rating request) in the second round, namely: The second EFUR for the Hashemite Kingdom of Jordan, the third EFUR for the Kingdom of Morocco, and the third EFUR for the Kingdom of Bahrain. In addition to four EFURs (without a TC re-rating requests), namely: The second EFUR for the United Arab Emirates, the first EFUR for the Arab Republic of Egypt, the fourth EFUR for the Islamic Republic of Mauritania, and the fourth EFUR for the Republic of Tunisia. These reports clarified the progress made by these countries in improving the AMLCFT systems in light of the observations/comments in their evaluation and follow-up reports.

In general, it can be said that member countries have made great efforts and experienced significant developments, given that this period witnessed the issuance of several AML/CFT laws and regulations, whether to enhance the criminalization of money laundering and terrorist financing or to impose new requirements on FIs and DNFBPs, such as the customer due diligence requirements, the implementation of UNSCRs, the activation of the recommended actions in respect of effectiveness, in addition to the improvement of the efficiency and effectiveness of various authorities, including supervisors and law enforcement authorities, by providing training to their staff through programs delivered by the MENAFATF or through other specialized programs. This year has also witnessed the issuance of several guidance and instructions to entities required to report suspicious transactions, and a number of requirements to enhance the countries' internal regulations related to risk management, detection, verification of information and data submitted by customers and follow-up and monitoring of unusual transactions as well as suspicious ones.

#### Timeline Of 2<sup>nd</sup> Round Of Mutual Evaluations

The MENAFATF started implementing the member countries' assessment program within the second round in order to verify the level of effectiveness of the systems applied and their extent of consistency with the international standards on AML/CFT/PF, based on the new assessment methodology issued by the FATF (February 2013) and their respective subsequent amendments. 22<sup>nd</sup> Plenary Meeting adopted the timeline of the second round of mutual evaluations, where two to three countries will be assessed every year, and all the laws and controls related to combating money laundering, the financing of terrorism and proliferation which are in effect in member countries will be examined and the effectiveness of their implementation reviewed. The MENAFATF will continuously monitor the progress made by member countries in improving their AML/CFT systems. Following their evaluation, countries submit follow-up reports within periods specified in the evaluation process procedures which are adopted by the MENAFATF Plenary Meeting

During this round, the MENAFATF, up to the end of 2022, adopted the timeline of the member countries as follows:

Country	Discussions of Plenary Meeting
Republic of Tunisia:	April 2016

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Country	Discussions of Plenary Meeting
Islamic Republic of Mauritania	April/May 2018
State of Libya*	November
Kingdom of Bahrain	June 2018
Kingdom of Saudi Arabia	June 2018
Syrian Arab Republic*	TBD
Kingdom of Morocco	April 2019
Republic of Yemen*	TBD
Hashemite Kingdom of Jordan	November 2019
United Arab Emirates:	February 2020
Arab Republic of Egypt	May 2021
State of Qatar	February 2022
Lebanese Republic:	May 2023
the People's Democratic Republic of Algeria	May 2023
State of Palestine:	November 2023
Republic of Sudan	November 2023
Republic of Iraq	April/May 2024
State of Kuwait	June 2024
Sultanate of Oman	October 2024
Republic of Djibouti	November 2024
Federal Republic of Somalia	April/May 2025

(1) It was agreed to postpone the Mutual Evaluation process for Libya, Yemen, and Syria, until political and security conditions improve.

(2) The date of the onsite visit and discussion of the report was set according to the dates listed above, in agreement with the FATF.

(3) The date for the onsite visit and discussion of the report was set after the discussions of the MEWG's 40th meeting on 17 November 2022.

### Latest Updates With Regards To The AML/CFT/PF International Standard, FATF's Methodology On Technical Compliance Assessment And The Effectiveness Of AML/CFT Systems

In the MEWG's 40<sup>th</sup> meeting held on 17 November 2022, the MENAFATF Secretariat made a presentation dealing with the latest developments in the international AML/CFT standards, as the amendments include: First: With regard to the review of Recommendation 25 and its INR., relating to transparency and beneficial ownership of legal arrangements: The FATF plenary in October 2022 agreed to publish the proposed amendments to the public through its website, provided that comments will be received until 6 December of this year, and it is expected that the proposed amendments and observations will be discussed and approved at the next meeting in February 2023. In general, the new amendments include strengthening the criteria for identifying the beneficial owner of legal arrangements to mitigate the risks of misuse of legal arrangements and to ensure timely access to beneficial ownership information. These amendments will be discussed in detail after their final



approval. With regard to the Arabic version of the evaluation methodology of the FATF, the Secretariat has worked on a comprehensive review of the Arabic version thereof.

### Second: On Typologies, Technical Assistance and Training:

#### ❖ Typologies:

During 2022, the MENAFATF adopted the typologies report on "abuse of NPOs in TF activities", which the MENAFATF began implementing in October 2021, with the aim of understanding how NPOs are abused in carrying out activities related to TF at the regional and international levels. The mechanisms and best practices used to mitigate the risks of abusing NPOs in TF activities, and preparing a list of indicators that will help financial institutions, DNFbps, LEAs and other stakeholders in identifying suspicious activities related to terrorist financing activities. The importance of implementing this project at this critical time stems from the fact that the MENAFATF has not conducted any study on the subject since its last report on best practices related to NPOs in 2005. Therefore, there is an urgent need to identify the risks associated with this important sector and ensure that it is not misused in terrorist financing operations and take into account the relevant FATF recommendations (Recommendation 8 and IO10), ensuring that the risk-based approach is applied in particular along with other standards, and stressing that this does not affect the work of these organizations.

In addition, the MENAFATF adopted the implementation of a new typologies project on "AML through legal persons and legal arrangements in the MENA region", as well as updating the endowment study issued by the MENAFATF more than a decade ago.

#### ❖ Technical Assistance, Typologies and Training

##### **Update on the status of Implementing the Training Programs and Webinars Plan for 2022**

The MENAFATF's training philosophy is based on foundations that follow the expected benefit from the training programs offered by the MENAFATF, and this stems from the importance of these programs in meeting the needs of the MENAFATF's member countries in terms of training, capacity building, and raising the level of awareness sufficient to understand ML/TF/PF cases, and contribution in preparing these countries for the second round of mutual evaluation processes that are currently underway, and in order to keep pace with emerging requirements on the regional and international arena in the areas of combating money laundering, financing terrorism and proliferation financing. The training programs also represent a higher goal for the MENAFATF to implement its strategic objectives and implement its policies on the ground, such as the action plan that was implemented in agreement with the FATF, in which training priorities were re-arranged to comply with the requirements of this plan and some programs were placed at the top of the priority list, such as the international AML/CFT/CPF standards program, the qualification and training program for assessors, in addition to the outputs and analysis of the priorities of member countries based on the TC matrix and AML/CFT/CPF training.

On the other hand, a concept has been prepared based on the implementation of the training plan by achieving some flexibility in its implementation, taking into account the possibility of implementing the training programs mentioned in the plan as the case permits, whether it is actually implemented, i.e., in an in-person capacity, or virtually. The following is an overview of the programs that were implemented according to the MENAFATF's training plan for 2022, and the programs that were carried over to the next plan 2023:

**1. The programs implemented during 2022<sup>1</sup>:**

Training session on the exchange of information between FIUs, supervisors and LEAs.	Executed 3 February 2022
Joint workshop to train and qualify assessors	Executed 8-12 May 2022
A session on FATF international standards	Executed 23 May - 2 June 2022
Webinar on Sanctions management, what the supervisors are looking for with regards to sanctions compliance	Executed 27 June 2022
Panel on the risks of abusing new technologies in ML crimes (VAs, NFTs, Stablecoin and others)	Executed 6-7 September 2022
Joint workshop to train and qualify assessors	Executed 25-29 September 2022
A session on FATF international standards	Executed 26 September to - 6 October 2022
Webinar on enhancing transparency on UBOs	Executed 30-31 October 2022
Webinar on the effective implementation of UNSCRs	Will be submitted through the UNODC during the RC meeting
OFTF meeting on the launch of the Regional Terrorist Financing Risk Assessment Project in the Middle East and North Africa	23 November 2022
Workshop on International cooperation and the mechanism to prepare MLA requests, freezing, confiscation, and asset recovery.	3 to 5 December 2022
Workshop on RBA to supervision over DNFBPs	13 to 15 December 2022

**2. Training Programs and Webinars postponed to Training Programs of 2023:**

workshop on CPF and its risks assessment	Place and time will be determined later
Workshop on strategic analysis	Place and time will be determined later
Cross-Border movement	Place and time will be determined later

**Matrix of Technical Assistance and Training in AML CFT/CPF**

The matrix of Technical Assistance and Training in AML/CFT/CPF reviews the needs of the MENAFATF member countries for technical assistance in combating money laundering and financing terrorism and financing proliferation, which is constantly updated based on requests received from member countries, or in response to these requests by donors.

Accordingly, communication and coordination with relevant international organizations were conducted and countries' needs for technical assistance were offered. UNODC, UNOCT, GIZ and RUSI provided their approval and cooperation to provide technical assistance programs for a number of the MENAFATF countries in combating money laundering and financing terrorism and financing proliferation.

<sup>1</sup> <https://menafatf.org/ar/information-center>

## Section Four: Policies Development and Quality Assurance

### 1<sup>st</sup> FUR on The Plan for Increasing Effectiveness of The MENAFATF

With reference to the FATF's meeting in October 2021, which approved the MENAFATF's completion of the plan on increasing effectiveness and urged it to continue communication with the FATF by providing an update in October 2022 to the Global Network Coordination Group ("GNCG"). The first report on the update on the progress made by the MENAFATF since October 2021, which included the schedule of MEs and FUs processes, the MENAFATF's ability to conduct high-quality processes until the completion of the ME round, and its implementation of the recommendations made in the final report of the Contact Group. The FATF plenary in October 2022 approved the submitted update report, which showed positive developments in the course of the MENAFATF's work, and reviewed the measures taken to implement the recommendations presented in the final report. The FATF called on the MENAFATF to enhance countries' readiness for the ME process, and the secretariat's experience and awareness of combating money laundering and terrorist financing in the region, and for the MENAFATF to provide another update in October 2023. The report and recommendations of the FATF were reviewed at the 35<sup>th</sup> plenary in November 2022. Work is underway to meet the FATF recommendations mentioned in the first follow-up report on the plan to increase the MENAFATF's effectiveness.

### Project On Increasing Consistency Between The MOU And The Bylaws

This project aims to improve the MENAFATF's work mechanisms by increasing consistency between the MoU and the Bylaws approved at the 32<sup>nd</sup> plenary in June 2021. From this standpoint, the views of member countries were sought in amending the MoU and proposing the necessary amendments thereto, in order to collect their comments and views thereon at the MENAFATF plenary and to clarify issues related to amending the MoU and the items contained in the Bylaws.

### Translation of Various Guidelines Issued by FATF

Translating a number of guidance during 2022 issued by the FATF into Arabic with the aim of raising awareness in the MENA region and keeping abreast of developments related to AML/CFT/CPF, which were shared with member countries and published on the MENAFATF's website, and the latest developments of PDQA reports are also published.



## Section Five: Financial Statement and Closing Accounts of the Fiscal Year

Ending on 31 December 2022

### Statement of financial position as of 31 December 2022

(Amounts in US \$)

	<u>Notes</u>	<u>31-Dec 2022</u>	<u>31-Dec 2021</u>
		USD	USD
<b>Assets</b>			
<b>Non-current assets</b>			
Plant and equipment	3	2046.568	979.856
Intangible assets	4	5664.064	6578.12
Right-of-use assets	5	6629.632	2173.28
		14340.26	9731.256
<b>Current assets</b>			
Members' contribution receivables	6	20161.5	88532.58
Prepayments and other receivables	7	2138.688	3433.632
Bank balance	8	608801.2	521089.8
		631101.3	613056
<b>Total assets</b>		<b>645441.6</b>	<b>622787.2</b>
<b>Accumulated funds and liabilities</b>			

<b>Accumulated funds</b>			
Strategic reserve	15	42412.8	42412.8
Accumulated funds		257818.7	269088.5
		300231.5	311501.3
<b>Liabilities</b>			
<b>Non-current liabilities</b>			
Deferred grants	12	31377.2	31274.55
Employees' terminal benefits	14	54714.02	38896.82
		86091.22	70171.38
<b>Current liabilities</b>			
Accruals and other payables	10	10656.59	36237
Deferred income - members	11	241734.5	202578.6
Current portion of lease liability	13	6727.77	2298.86
		259118.9	241114.5
<b>Total liabilities</b>		345210.1	311285.9
<b>Total accumulated funds and liabilities</b>			
		645441.6	622787.2

**Statement of comprehensive income for the year ending on 31 December 2022**  
(Amounts in US \$)

	Notes	Year ended 31-Dec 2022 USD	Year ended 31-Dec 2021 USD
<b>Income</b>			
Contributions from members	16	317197.4	346494.9
Other income	17	10692.69 327890	32585.29 379080.2
<b>Expenses</b>			
Direct costs	18	(265249)	(235011)
General and administrative expenses	19	(3985.60)	(3885.96)
Depreciation	3	(390.66)	(617.02)
Amortization of intangible assets	4	(2256.38)	(1260.73)
Depreciation on right-of-use assets	5	(6592.78)	(7289.51)
Allowance for doubtful members' contribution receivables	6	(60346.10)	0
Finance costs	20	(339.15) (339160)	(364.34) (248428)

**(Deficit)/  
surplus for the  
year**

(11269.8) 130652.1



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