



Republic of Mauritius

SECOND TERRORIST FINANCING RISK ASSESSMENT OF NON-PROFIT ORGANISATIONS IN MAURITIUS

**MINISTRY OF FINANCIAL SERVICES AND ECONOMIC PLANNING
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Acronyms

AGO	Attorney-General's Office
AML/CFT/CPF	Anti-Money Laundering/Countering the Financing of Terrorism/Countering Proliferation Financing (also used for Combatting the financing of terrorism and combatting the financing of proliferation of weapons of mass destruction)
BOM	Bank of Mauritius
BOWC	Board of Waqf Commissioners
CCID	Central Criminal Investigating Department
CTU	Counter Terrorism Unit
ESAAMLG	Eastern and Southern Africa Anti-Money Laundering Group
FATF	Financial Action Task Force
FCC	Financial Crimes Commission
FIU	Financial Intelligence Unit
FSA	Financial Services Act
FSC	Financial Services Commission
FTFs	Foreign Terrorist Fighters
INTERPOL	International Criminal Police Organisation
IO	Immediate Outcome
ISIS	Islamic State of Iraq and Syria
MER	Mutual Evaluation Report
ML	Money Laundering
MPF	Mauritius Police Force
MRA	Mauritius Revenue Authority
MFSEP	Ministry of Financial Services and Economic Planning
MVTS	Money or Value Transfer Services
NPOs	Non-Profit Organisations
NRA	National Risk Assessment
NSIF	National Social Inclusion Foundation
ODPP	Office of the Director of Public Prosecutions
OMQ	Offsite Monitoring Questionnaire
QT(s)	Qualified Trustee(s)
ROA	Registrar of Associations
ROC	Registrar of Companies
ROF	Registrar of Foundations
STRs	Suspicious Transaction Reports
TCSPs	Trust and Company Service Providers
TF	Terrorist Financing
TFIC	Terrorist Financing Investigation Committee
UN	United Nations
UNSC	United Nations Security Council
VASP(s)	Virtual Asset Service Provider(s)
VAITOS Act	Virtual Asset and Initial Token Offering Services Act 2021

Executive Summary

- 1 This report assesses the terrorist financing risks to the Non-Profit Organisation (NPO) sector in Mauritius, and the effectiveness of measures in place to address the identified risks. It is published by the Ministry of Financial Services and Economic Planning (MFSEP) in February 2026. It has been completed with the support of the European Union Global Facility on Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT), using a methodology developed by Greenacre Associates.
- 2 The report was commissioned to comply with the requirements of Financial Action Task Force (FATF) Recommendation 8 and Immediate Outcome (IO) 10, which require countries to demonstrate that they understand the Terrorist Financing (TF) risks that apply to their NPO sector, and are taking focused, proportionate and risk-based measures to address the TF risks identified.
- 3 The risk assessment uses a methodology designed to comply with FATF requirements and best practices. The methodology used in this risk assessment is designed to meet these requirements as follows:

FATF Requirements for Risk Assessments (Source: FATF Methodology)

Para.	Requirement	Relevant section
8.1(a)	<i>identify which subset of organizations fall within the FATF definition of NPO</i>	Part 2
8.1(b)	<i>conduct a risk assessment of these NPOs to identify the nature of TF risks posed to them.</i>	Part 3
8.1(c)	<i>have in place focused, proportionate and risk-based measures to address the TF risks identified, in line with the risk-based approach</i>	Part 4

- 4 The risk assessment employs a multi-sectoral approach, with engagement, contributions and review from the authorities, the NPO sector and the banking sector.
- 5 The assessment utilises a comprehensive package of qualitative and quantitative data, including both data collected specifically for this exercise and pre-existing data sources. This comprises:
 - Official data provided by the NPO regulators, the Financial Intelligence Unit (FIU), law enforcement agencies, tax authorities, other intelligence agencies and relevant supervisory bodies.
 - Questionnaires and in-person interviews with officials from the authorities listed above, the financial sector and NPOs;
 - Review of official reports, including the National Risk Assessment (2025);
 - A review of relevant legislations; and
 - NPO surveys, with 988 responses.

Section 1.2 provides comprehensive details on the methodological approach and sources used.

FATF NPOs in Mauritius

- 6 In line with the requirements of criterion 8.1(a) of the FATF Methodology, the risk assessment starts with an analysis of the FATF definition of NPO within the Mauritius context. Section 2.1 concludes that FATF NPOs can be found within the following categories of NPO in Mauritius:
- a) Associations
 - b) Waqfs
 - c) Charitable Foundations
 - d) Companies Limited by Guarantee
 - e) Charitable Trusts
- 7 Section 2.2 examines the nature of FATF NPOs in Mauritius. The data suggests that there are 10,207 estimated NPOs in Mauritius that meet the FATF definition of NPO. 92% of the FATF NPOs are Associations.

FATF NPOs by Legal Type (Source: Official data; NPO surveys)¹.

	Total number of entities	Estimated number that are FATF NPOs	Proportion of total FATF NPOs
Associations	9978	9396	92.05%
Waqfs	539	331	3.24%
Charitable Foundations	199	199	1.95%
Companies Limited by Guarantee	353	198	1.94%
Charitable Trusts	83	83	0.81%
Total		10,207	

The Terrorist Financing Risks to NPOs in Mauritius

- 8 The terrorism and TF threat in Mauritius have been assessed in the 2025 National Risk Assessment (NRA) as Medium-Low.
- 9 All competent authorities were asked to provide in writing and in person information on any TF incidents involving NPOs since the last NPO TF Risk Assessment in 2020. No convictions or prosecutions involving NPOs and TF were reported. None of the investigations carried out by the Mauritius Police Force (MPF) have uncovered any evidence of TF abuse of NPOs.
- 10 All interviewed officials stated that they assessed the risk as none, very low or low. The survey showed that 90% of NPOs stated that they faced no risk from TF, with a further 7% rating their exposure as low.
- 11 Mauritius' compliance with FATF standards supports confidence in the ability of the authorities to identify TF abuse. Comparative analysis of Mauritius with four jurisdictions with similar characteristics suggests that an assessment of the TF risk to NPOs as low would be entirely consistent with the experiences of peers.
- 12 Overall, the assessment is that the risk of the abuse of NPOs from TF is Low.

Risk of Terrorist Financing Abuse of NPOs in Mauritius: Low

¹ Data as of December 2025 (Associations); December 2025 (Charitable Foundations, Companies Limited by Guarantee); April 2025 (Charitable Trusts); November 2025 (Waqfs).

13 Four potential risk factors have been identified. Three higher-risk categories are:

1. The raising of funds by NPOs in Mauritius for humanitarian causes in high-risk jurisdictions, with the risk that these funds are used to support Foreign Terrorist Fighters (FTFs) or otherwise diverted for the benefit of terrorist groups in these jurisdictions.
2. NPO links with high-risk jurisdictions, with two potential misuses. First, the potential for NPOs to be used as vehicle for funds to be sourced from or sent to terrorist groups or sympathisers in these jurisdictions; secondly, the potential for foreign nationals sympathetic to extremist causes to control NPOs in Mauritius.
3. The possible use of online crowdfunding or virtual assets to raise or move funds by or through NPOs for TF purposes.

14 Charitable Trusts have been assessed as potentially medium risk.

15 Analysis of these categories suggests that they account for a maximum of 2% of the total NPO sector, meaning that 98% of NPOs are assessed as having little or no TF risk.

Measures to Identify, Prevent and Combat Terrorist Financing Abuse

16 An assessment has also been conducted on a range of measures to protect NPOs from TF abuse. FATF requires measures to protect NPOs from TF abuse to be focused, proportionate, risk-based, and not unduly inhibit legitimate NPO activity. The assessment of the measures in place is guided by the overall low-risk environment. A summary of the findings is provided in the table below:

Measure	Assessment and Noted Deficiencies
Sustained outreach to the sector concerning TF issues	The measures are assessed as effective.
Self-regulatory measures and internal controls	There is some evidence of internal controls in place, but insufficient comprehensive data to make a full assessment. There is no evidence of self-regulatory mechanisms.
Oversight – understanding what the risks are.	The measures are assessed as effective.
Oversight – obtaining information on all potentially risky NPOs.	The registration systems for Associations, Companies Limited by Guarantee, Charitable Foundations and Waqfs are comprehensive and effective, but are deficient in relation to Charitable Trusts (see below).
Oversight – Identifying individual NPOs that may be exposed to the identified risk factors	The framework for Associations, Companies Limited by Guarantee, Charitable Foundations and Waqfs are in place and effective. Some measures are needed to improve compliance rates, and some measures need to be reviewed to reflect the latest understanding of risk. Measures are deficient in relation to Charitable Trusts (see below).
Monitoring measures for specific types of NPOs	The risk-based inspection mechanisms for associations, Charitable Foundations, Companies Limited by Guarantee and Charitable Trusts are effective.
Monitoring measures for all legal entities	Competent authorities including the MPF, the Bank of Mauritius (BOM), the Financial Services Commission (FSC) and the Mauritius Revenue Authority (MRA) have appropriate monitoring powers for all legal entities, including NPOs. New

	measures for monitoring Virtual Assets Service Providers (VASPs) have been implemented, but measures for monitoring of online crowdfunding have yet to be proclaimed.
Sanctions	The measures are assessed as effective.
Information sharing, intelligence and investigations.	Competent authorities including the MPF and regulators have appropriate powers to investigate and share information.
Compliance with international obligations under the Charter of the United Nations and Human Rights Law	Fully compliant.
Ensuring NPO access to financial services	No widespread or systemic issues with financial access identified, although there are some isolated cases.
Charitable Trusts	As noted above, specific deficiencies are noted in the oversight and monitoring of Charitable Trusts.

17 Specific recommendations have been formulated to address the deficiencies identified above.

18 The residual risks have been assessed as follows²:

- For Associations, Charitable Foundations, Companies Limited by Guarantee and Waqfs: **Very Low.**
- For the use of virtual assets by NPOs: **Low**
- For the possible use of online crowdfunding by NPOs: **Low-Medium.**
- For raising humanitarian funds for use in high-risk jurisdictions: **Low**
- For sending or receiving funds to/from high-risk jurisdictions: **Low**
- For individuals from high-risk jurisdictions being in control of an NPO: **Low-Medium**
- For Charitable Trusts: **Low-Medium.**

² In the assessment of residual risk, the rating of very low, low and low-medium is regarded to be on the low side.

Context and Methodology

1.1 Context

- 19 The ongoing international campaign against TF identified typologies worldwide where terrorists and terrorist organizations exploit the NPO sector through: collection, consolidation/aggregation, transfer, dissemination and use of funds raised (what is also known as the funding cycle); providing logistical support; encouraging terrorist recruitment; otherwise supporting terrorist organizations and operations; creating sham charities; or engaging in fraudulent fundraising.
- 20 The FATF is the international standard setting body in the area of Anti-Money Laundering/Combating the Financing of Terrorism/Countering Proliferation Financing (AML/CFT/CPF). As part of this mandate, it considers the potential abuse of NPOs for TF. Two parts of the FATF standards refer directly to NPOs - these are Recommendation 8 and IO 10 (see Annex 1). The purpose of these measures is to protect NPOs from TF abuse.
- 21 Both FATF Recommendation 8 and FATF IO 10 require that countries identify those organisations that fall within the FATF definition of NPOs and assess their TF risks.
- 22 Mauritius is a member of the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG), a FATF-Style Regional Body (FSRB), since 1999 and has committed to subscribing to the global standards to combat money laundering (ML) and financing of terrorism and proliferation. ESAAMLG last published a Mutual Evaluation Report (MER) of Mauritius' compliance with the FATF standards in July 2018³, using the 2013 Methodology. The MER rated Recommendation 8 as Non-Compliant, and a low level of effectiveness under IO 10.
- 23 The report reached the following conclusions:

*Mauritius did not meet all the criteria under Recommendation 8. Although the Registration of Associations and Foundations Acts had licensing/registration requirements and the Registrar of Associations and Foundations had powers to ask for a wide range of information from the NPOs when necessary, all the measures regulating the activities of NPOs in Mauritius under the Acts were not for purposes of dealing with the possible exposure of the NPO sector to abuse for TF activities. Authorities had not undertaken a comprehensive review of the NPO sector to appropriately understand TF risks and had not taken steps to promote targeted risk-based supervision or monitoring of NPOs. The NPO sector had not been engaged to raise awareness about potential vulnerabilities to TF abuse and risks. In view of the foregoing deficiencies, **Mauritius was rated Non-Compliant with R 8.***
- 24 In terms of effectiveness, the MER indicated that authorities had not reviewed the NPO sector to identify members which were at risk of abuse for TF purposes. Lack of monitoring of the NPO sector for TF was aggravated by the lack of measures by authorities to understand TF risks associated with the sector.
- 25 Following the MER, Mauritius was placed in the one-year observation period because it met the International Co-operation Review Group referral criteria as follows:
 - it had 26 Non-Compliant/Partially Compliant ratings for technical compliance including Recommendation 8;
 - it was rated Non-Compliant/Partially Compliant on R. 5, 6 and 10; and
 - it had a low or moderate level of effectiveness for all the 11 effectiveness outcomes.

³ Link to MER: <https://www.esaamlg.org/reports/Second%20Round%20MER%20of%20Mauritius-July%202018.pdf>

In addition, the country met the threshold of USD 5 billion of financial sector assets.

- 26 Since the completion of its MER in 2018, Mauritius had made progress on a number of its MER Recommended Actions to improve technical compliance and effectiveness. However, the Africa/Middle East Joint Group considered that not all strategic deficiencies were fully addressed. It, accordingly, recommended that Mauritius be placed on the list of jurisdictions under increased monitoring by FATF in February 2020. Five actions to address these strategic deficiencies were identified, including one relating to NPOs as follows:

“4. Implementing a risk-based approach for supervision of its NPO sector to prevent abuse for TF purposes”

Current Status:

- 27 Five Enhanced Follow-Up Reports⁴ were published between April 2019 and September 2021. In the *Fourth Enhanced Follow-Up Report and Technical Compliance Re-Rating* published in September 2021⁵, Recommendation 8 was re-rated Largely Compliant. The Report stated:

“Mauritius has taken significant measures to address deficiencies identified in its MER under R.8 and meets nearly all the criteria. NPOs in Mauritius are broadly divided into 4 categories: Associations, Foundations, Charitable Trusts and Companies Limited by Guarantee. Associations constitute 96% of NPOs in Mauritius and most of the deficiencies set out above relate to other types of NPOs (which make up 4% of total NPOs). Therefore, the impact of the deficiencies on the overall rating of R.8 was weighted as low. In addition, Mauritius has met the core requirements of R.8: the country carried out a risk assessment and identified a sub-set of NPOs at the risk of TF abuse and the country has adopted risk-based supervision of NPOs. On this basis, the shortcomings were considered to be minor. Hence, Recommendation 8 has been re-rated Largely Compliant.”

- 28 At its October 2021 Plenary, FATF concluded that Mauritius has strengthened the effectiveness of its AML/CFT regime and addressed related technical deficiencies to meet the commitments in its action plan regarding the strategic deficiencies. Mauritius would no longer be subject to increased monitoring by the FATF.
- 29 Significant reforms to Recommendation 8 and its Interpretive Note, IO.10, the FATF Best Practices Paper and FATF Methodology have been introduced since Mauritius’ last MER. Whilst this risk assessment acknowledges the deficiencies and progress identified in the MER and 4th Follow up Report, it is primarily focused on ensuring compliance with the revised FATF standards and guidance on R8.

⁴Links to reports: https://www.esaamlg.org/index.php/Countries/readmore_members/mauritius

⁵ Links to reports: <https://www.esaamlg.org/reports/4th%20FUR%20Mauritius-%20September%202021.pdf>

1.2 General Methodological Approach

- 30 This section provides details on the general methodological approach to the risk assessment, including the structure of the assessment, definitions of terms and how they are interpreted, how it was implemented, and data and sources used. Separately, each of the three parts of the risk assessment starts with specific consideration of the aims for that part and how it meets the FATF requirements.
- 31 The purpose of this exercise is to assess the TF risks of NPOs that fall within the FATF definition of NPOs, and the effectiveness of mitigation measures in addressing the identified risk in a risk-based, proportionate and focused way.
- 32 FATF states that:
- “A TF risk assessment is a product or process based on a methodology that attempts to identify, analyse and understand TF risk and serves as a first step in addressing them.”⁶*
- 33 Paragraph 8.1 of the FATF Methodology states:
- “Since not all organisations working in the not-for-profit realm in a country are inherently high risk without prejudice to the requirements of Recommendation 1, countries should:*
- (a) identify which subset of organizations fall within the FATF definition of NPO;*
- (b) conduct a risk assessment of these NPOs to identify the nature of TF risks posed to them; and*
- (c) have in place focused, proportionate and risk-based measures to address the TF risks identified, in line with the risk-based approach.”⁷*
- 34 This risk assessment was completed using a Methodology provided by Greenacre Associates.⁸ It is based as closely as possible under FATF requirements and guidance. The methodology used in this risk assessment is designed to meet these requirements as follows:

Table 1: FATF requirements for risk assessments (Source: FATF Methodology)

Para.	Requirement	Relevant section
8.1(a)	<i>Identify which subset of organizations fall within the FATF definition of NPO</i>	Part 2
8.1(b)	<i>Conduct a risk assessment of these NPOs to identify the nature of TF risks posed to them.</i>	Part 3
8.1(c)	<i>Have in place focused, proportionate and risk-based measures to address the TF risks identified, in line with the risk-based approach</i>	Part 4

⁶ 21, *Combating the Terrorist Financing Abuse of Non-Profit Organisation* (the ‘Best Practices Paper’ ‘BPP’) [FATF, 2023]

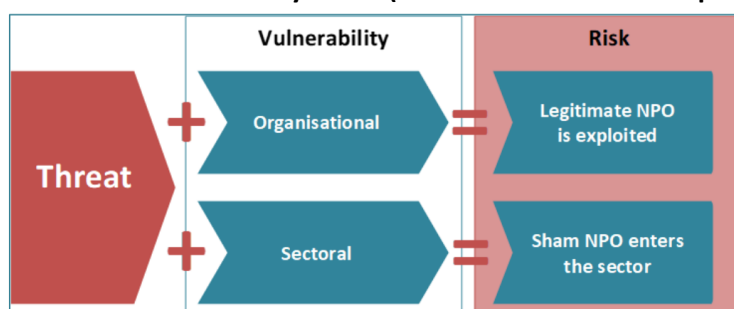
⁷ *Methodology for Assessing Technical Compliance with the FATF Recommendations and the Effectiveness of AML/CFT/CPF Systems* (FATF, 2024)

⁸ Four of the best practice examples on risk assessments in the Best Practices Paper used the Greenacre Methodology (Examples A7, A8, A10 and A11).

Terminology and Key Concepts

- 35 The *Best Practices Paper* provides the following graphic to illustrate how TF risk is assessed in the NPO sector.

Figure 1: Threat + Vulnerability = Risk (Source: Best Practices Paper (2023))



- 36 FATF defines the key concepts relating to risk in the *Best Practices Paper* (FATF 2023), the *FATF Guidance: National Money Laundering and Terrorist Financing Risk Assessment* (FATF, 2013) and *The Risk of Terrorist Abuse in Non-Profit Organisations* (FATF, 2014). These definitions are used in this risk assessment. Additional interpretations of these terms within the context of this risk assessment, and definitions of additional key terms, are provided as follows:

Table 2: Definitions (Source: FATF documents as referenced)

Term	FATF definition
Non-Profit Organisation (NPO)	'a legal person or arrangement or organisation that primarily engages in raising or disbursing of funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of "good works."' ⁹
Terrorist Financing (TF) Abuse of NPOs	'refers to the exploitation by terrorists and terrorist organisations of NPOs to raise or move funds, provide logistical support, encourage or facilitate terrorist recruitment, or otherwise support terrorists or terrorist organisations and operations' ¹⁰
Risk	'the ability of a threat to exploit a vulnerability.' ¹¹
Threat	'A person or group of people, object or activity with the potential to cause harm.' ¹² Threat is contingent on actors that possess both the capability and the intent to do harm.
Vulnerability	'things that can be exploited by the threat or that may support or facilitate its activities.' ¹³
Consequence	'the harm that a TF threat may cause if eventuated' ¹⁴

⁹ Glossary, *Interpretive Note to Recommendation 8*.

¹⁰ 8, *Best Practices Paper*.

¹¹ 22, *Best Practices Paper*.

¹² 57, *Typologies Report*.

¹³ 58, *Typologies Report*.

¹⁴ 22, *Best Practices Paper*.

Implementation

- 37 FATF recommends a multi-sectoral approach to risk assessments, with relevant government agencies, NPOs and private sector representatives engaged.
- From the authorities, this should include competent bodies on CFT and NPO policy, the FIU, law enforcement agencies, tax agencies and intelligence agencies.¹⁵
 - For civil society, it states that their engagement is ‘vital’, and recommends including a representative sample, *“considering factors such as the size of entities, organisational capacities, nature of operations, and diversity of participants, and, when relevant, representatives that have reliable knowledge of unregistered or unlicensed NPOs.”*¹⁶
 - From the private sector, it suggests consulting financial institutions, such as banks, money or value transfer services (MVTs) businesses, and their professional Associations. Other groups, such as auditors, may be engaged if appropriate.¹⁷
- 38 This methodology ensures the participation of all these stakeholders through the establishment of an Implementation Team (to implement the risk assessment) and a Working Group (to oversee and review the risk assessment).
- 39 The Working Group included the following institutions:
- Ministry of Financial Services and Economic Planning (MFSEP);
 - Registrar of Associations (ROA);
 - Registrar of Companies (ROC);
 - Registrar of Foundations (ROF);
 - Financial Services Commission (FSC);
 - Board of Waqf Commissioners (BOWC);
 - Financial Intelligence Unit (FIU);
 - Mauritius Police Force (MPF);
 - Bank of Mauritius (BOM);
 - Mauritius Revenue Authority (MRA);
 - Attorney General’s Office (AGO); and
 - Financial Crimes Commission (FCC).
- 40 The primary responsibilities of the Working Group were to:
- Ensure the cooperation of necessary agencies to the risk assessment process, including provision of data and allocation of resources;
 - Provide written and verbal comments on draft assessment and recommendations;
 - Sign-off final assessment report and recommendations; and
 - Commit relevant agencies to the outcomes of the risk assessment.

¹⁵ 31, Best Practices Paper.

¹⁶ 32, Best Practices Paper.

¹⁷ 33, Best Practices Paper.

- 41 Between 11th October 2024 and 5th November 2025, the Working Group was provided with twelve training or orientation sessions.
- 42 The Implementation Team comprised of representatives from the following organisations:
- MFSEP;
 - ROA;
 - ROC;
 - ROF;
 - FSC; and
 - FCC.
- 43 The responsibilities of the Implementation Team were to:
- Identify and secure the engagement of key stakeholders;
 - Obtain and analyse the required data;
 - Complete the initial draft of the report, assessment and recommendations; and
 - Liaise with the external consultant.
- 44 A Validation Meeting attended by members of the Working Group was held in Mauritius on 28 January 2026 to approve this report.
- 45 In addition to the information obtained through surveys (see below), representatives from NPOs and financial institutions were engaged through meetings with representatives of the Implementation Team. The NPO representatives were apprised of the key findings of the TF Risk Assessment of NPOs, following which feedback were incorporated in the draft public report.

Sources, data and data collection techniques

- 46 FATF establishes the following requirements and recommendations for sources and types of information in the risk assessment. It requires *“collecting a wide range of quantitative and qualitative information.”*¹⁸ In line with FATF guidance, it should ensure that qualitative data is given its due weight.¹⁹
- 47 The risk assessment should use *“all relevant and reliable sources of information, including through engagement with NPOs.”*²⁰ For the purpose of this risk assessment, the specific sources included:
- FIU;
 - Law Enforcement Agencies;

¹⁸ 24, Best Practices Paper.

¹⁹ *“While quantitative assessments (i.e., based mostly on statistics) may seem much more reliable and able to be replicated over time, the lack of available quantitative data in the ML/TF field makes it difficult to rely exclusively on such information. Moreover, information on all relevant factors may not be expressed or explained in numerical or quantitative form, and there is a danger that risk assessments relying heavily on available quantitative information may be biased towards risks that are easier to measure and discount those for which quantitative information is not readily available. For these reasons, it is advisable to complement an ML/TF risk assessment with relevant qualitative information such as, as appropriate, intelligence information, expert judgments, private sector input, case studies, thematic assessments, typologies studies and other (regional or supranational) risk assessments in addition to any available quantitative data.”* Paragraph 30-31, **FATF Guidance: National Money Laundering and Terrorist Financing Risk Assessment** (FATF (2013).

²⁰ 8.1 of the FATF Methodology, footnote 60.

- Tax authorities;
- Other Intelligence agencies;
- Competent ministries for CFT policy and NPO policy;
- Other relevant government agencies, such as the financial sector supervisor;
- “All relevant groups of NPOs” reaching “as many different constituencies as possible.”²¹ This should include umbrella organisations and self-regulatory organisations.
- Financial institutions.²²

48 Collection techniques for the risk assessment include:

- Focus groups, interviews, questionnaires and surveys;
- Reliable open-source information.²³

49 This risk assessment meets the FATF requirements and recommendations for sources and types of information as follows:

50 Official data and reports:

- *Mauritius Second Money Laundering and Terrorist Financing National Risk Assessment* (2025). Available at: https://financialservices.govmu.org/Documents/AnnualReport/NRA_Public_Report.pdf.
- *Terrorist financing risk assessment for the NPO sector in Mauritius* (2020) Available at: <https://www.fiumauritius.org/fiu/wp-content/uploads/2022/07/Executive-Summary-TF-Risk-Assessment-NPO-Sector-Mauritius.pdf>.
- *The National Strategy for Combatting Money Laundering and Terrorist Financing, (the ‘AML/CFT Strategy’)* 2019-2022. Available at https://www.fiumauritius.org/fiu/wp-content/uploads/2021/05/NATIONAL-STRATEGY-2019-2022_REVISED.pdf
- Official data on NPOs for the period January 2020 to December 2025, provided as follows:
 - ROA;
 - ROC;
 - ROF;
 - FSC; and
 - BOWC.

51 Data request and questionnaire. Written requests for data on terrorist financing in the NPO sector, case studies, and surveyed perceptions of the TF risk, threats and vulnerabilities were obtained from relevant agencies such as:

- ROA;
- ROC;
- ROF;
- FSC;

²¹ 32, Best Practices Paper.

²² 33, Best Practices Paper.

²³ 28, Best Practices Paper.

- BOWC;
- FIU;
- MPF;
- BOM;
- MRA; and
- AGO.

52 Data from Suspicious Transaction Reports (STRs): The FIU provided a summary of STRs received on FATF NPOs on covering the January 2020 to December 2024.

53 Interviews: Interviews were conducted with representatives of all relevant competent authorities and each category of FATF-defined NPOs in May 2025.

54 Legal review: The following laws and regulations were reviewed, including relevant amendments, implementing regulations and notices.

- The Registration of Associations Act 1978
- The Companies Act 2001
- The Foundations Act 2012
- The Waqf Act 1941
- The Anti-Money Laundering and Combatting the Financing of Terrorism and Proliferation (Miscellaneous Provisions) Act 2024
- The Trusts Act 2001
- The Financial Services Act (FSA) 2007

The review was supplemented by interviews with officials responsible for their implementation (see interviews above).

55 Survey: A survey of 836²⁴ NPO representatives was conducted to obtain information on NPOs' size, form, activities, and financing; their perceptions of TF risk; issues with access to financial services; and the penetration of government's outreach measures (see section 2 for details and results).

56 FATF NPOs have five legal types: Associations, Waqfs, Companies Limited by Guarantee, Charitable Foundations and Charitable Trusts. In all cases, some of the organisations within the legal category may not meet the legal definition.

57 Independent surveys of each of the five legal types were undertaken²⁵. For Associations, a random sample of 407 Associations were interviewed by telephone, in person, email and by post. For Associations, this means there is a 95% chance that the real value of any value is within $\pm 4.77\%$ of the surveyed value.

Table 3: The NPO surveys.

	FATF NPOs	Sample size	Responses	Sample rate	Response Rate
Associations	9396	500	407	0.04	81%
Waqfs	331	179	173	0.54	97%

²⁴ For Charitable Trusts, the survey figure includes number of QTs for Charitable Trusts which is 47.

²⁵ Questionnaires were sent by email and post to 500 associations; 407 responses were received. For waqfs, Mutawallis were interviewed by phone, email or in person. All other surveys were conducted by post and email.

Companies Limited by Guarantee	199	198	82	1.00	41%
Charitable Foundations	188	157	127	0.68	81%

58 For Charitable Trusts, all 254 Qualified Trustees (QTs) were approached and asked to identify if they managed any Charitable Trusts. 199 responses were received, a response rate of 78%. Of these, 47 QTs stated that they managed a total of 83 Charitable Trusts. The remainder did not manage any Charitable Trusts.

Table 4: The survey of Qualified Trustees.

	Total QTs	Responses	Response rate	QTs with Charitable Trusts	Number of Charitable Trusts managed
Charitable Trusts	254	199	78%	47	83

59 Mutual Evaluation and Follow-Up Reports: The following evaluations on AML/CFT in Mauritius were consulted:

- *Second Round Mutual Evaluation Report of Mauritius (MER)*.²⁶
- *1st Enhanced Follow-up Report and Technical Compliance Re-Rating for Mauritius* (April 2019).²⁷
- *4th Enhanced Follow-up Report and Technical Compliance Re-Rating for Mauritius* (September 2021).²⁸
- *5th Enhanced Follow-up Report and Technical Compliance Re-Rating for Mauritius* (September 2022).²⁹

60 FATF Guidance Documents: The following guidance documents were used primarily to inform the methodological approach, but also selectively and in context to inform assessments where primary data was not available:

- *The Interpretive Note to Recommendation 8 (see International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation (2012-2023))*.
- *Methodology for Assessing Technical Compliance with the FATF Recommendations and the Effectiveness of AML/CFT/CPF Systems* (FATF, 2024).
- *Combating the Terrorist Financing Abuse of Non-Profit Organisation (the ‘Best Practices Paper’ ‘BPP’)* [FATF, 2023].
- *The Risk of Terrorist Abuse in Non-Profit Organisations* (FATF, 2014).
- *The Terrorist Financing Risk Assessment Guidance* (FATF, 2019).
- *FATF Guidance: National Money Laundering and Terrorist Financing Risk Assessment* (FATF, 2013);
- *Feedback from the FATF Private Sector Consultative Forum (Vienna, March 2016) and other discussions with the FATF Secretariat 2016-25*.

²⁶ <https://www.esaamlg.org/reports/Second%20Round%20MER%20of%20Mauritius-July%202018.pdf>

²⁷ [1st FUR Mauritius – April 2019](#)

²⁸ [4th FUR Mauritius- September 2021](#)

²⁹ [5th FUR Mauritius- September 2022](#)

- *Comprehensive Update on Terrorist Financing Risks (FATF, 2025).*

61 Risk assessments from jurisdictions with similar characteristics. FATF states that “information from foreign authorities can help provide competent authorities with a better understanding of the TF risk environment in which NPOs are operating, and context surrounding instances of abuse and circumstances of risk.”³⁰ The following risk assessments from jurisdictions with similar characteristics were consulted to provide comparative and contextual analysis:

- Jersey: *National Risk Assessment of Non-Profit Organisations of the Bailiwick of Jersey* (Government of Jersey, 2022);
- Seychelles: *Terrorist Financing Risk Assessment for the NPO Sector in Seychelles* (unpublished, 2023);
- British Virgin Islands: *2024 Virgin Islands Non-Profit Organisations Terrorist Financing Risk Assessment* (FIA, 2024);
- Trinidad and Tobago: *National Risk Assessment: Assessing the Risk of Abuse of Non-Profit Organisations (NPOs) for Terrorist Financing* (unpublished, 2024).

62 Focus Group Discussions: Focus Group discussions were conducted with the donor community and Umbrella NPO in an effort to reach out to all relevant groups of NPOs and establish a successful risk assessment exercise.

³⁰ 79, Best Practices Paper.

FATF NPOs in Mauritius

2.1 Identifying FATF NPOs

- 63 Recommendation 8 states that “countries should identify the organisations which fall within the FATF definition of non-profit organisations”. FATF defines NPOs as “a legal person or arrangement or organisation that primarily engages in raising or disbursing of funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of “good works.”³¹
- 64 FATF provides the illustration in Figure 2 to illustrate which NPOs should be covered by the risk assessment. The purpose of the exercise in this section is to distinguish the FATF defined NPOs (in orange) from all organisations working in the non-profit realm (in blue).

Figure 2: FATF NPOs (Source: Best Practices Paper)



- 65 The NPO TF Risk Assessment published in 2020 identified the following four categories as comprising FATF NPOs. None of the legal definitions of NPOs on which this analysis was based have been revised since this analysis was completed in 2020.

Table 5: NPOs in Mauritius which meet the FATF definition (Source: Terrorist Financing Risk Assessment for the NPO Sector in Mauritius (2020))

	Type	Relevant law
1	Associations (RoA)	The Registration of Associations Act 1978
2	Charitable Foundations	The Foundation Act 2012, as amended 2018
3	Charitable Trusts	The Trusts Act 2001
4	Companies limited by guarantee	The Companies Act 2001 (as amended)

- 66 FATF’s definition of NPOs has not been amended since 2020. It recognises that NPOs can have ‘a variety of legal forms, depending on the country’. It therefore chooses to adopt what it calls a ‘functional definition’ of NPOs. The functional definition “is based on those activities and characteristics of an organisation which may put it at risk of TF abuse, rather than on the simple fact that it is operating on a non-profit basis.”³²
- 67 However, since 2020, FATF has provided some narrow elaboration on how its definition of NPO should be applied. Most specifically, in 2023 FATF stated that the definition excludes trade unions, and organisations “that primarily conduct research and/or advocate for changes in public policy but do not

³¹ Glossary, *Interpretive Note to Recommendation 8* (FATF, 2024).

³² 1, Best Practices Paper.

*raise or disburse funds for NPO causes.”*³³ However, FATF declined an invitation to define what the term ‘good works’ means, as what is considered ‘good works’ will differ from country to country and context to context.³⁴

68 The 2020 analysis has been reviewed in the light of the subsequent FATF clarifications. The only significant change is that some Waqfs are now assessed as being FATF NPOs. The analysis concludes that all FATF NPOs within Mauritius will fall into one of five legal types. However, all five legal types contain some entities which are outside of the FATF definition. There are three broad categories:

1. Associations: Legal type of which a majority are FATF NPOs.

A clear majority of Associations are FATF NPOs. A small minority of Associations primarily engaged in research or advocacy are not, following guidance in the revised Best Practices Paper of 2023.

2. Foundations and Trusts: Legal types of which a small minority are FATF NPOs.

There are several hundred foundations and several thousand trusts in Mauritius, but only a small proportion are exclusively charitable. Only these charitable entities are FATF NPOs.

3. Companies Limited by Guarantee and Waqfs: Mixed

Companies Limited by Guarantee and Waqfs are the most challenging types to sift. Both legal forms include entities which are clearly FATF NPOs, entities which are clearly not, and entities which have characteristics of both.

2.2 Quantifying FATF NPOs

69 The ROF, the ROC and BOWC were able to individually assess the entities within their remit and identify those that fall within the FATF definition of NPO. The results are recorded in Table 6. QTs were asked to identify Charitable Trusts amongst their clients, giving a confirmed figure for that legal type.

70 All Associations are considered FATF NPOs except those primarily engaged in research or advocacy for changes in public policy. The large number of Associations mean that individual assessment is challenging, but the survey can be used to identify the proportion of Associations that recorded their activities as ‘advocacy’ or ‘human rights’.

Table 6: FATF NPOs by legal type (Source: Official data; NPO surveys)³⁵

	Total Number of Entities	Estimated Number that are FATF NPOs	Proportion of Total FATF NPOs
Associations	9978	9396	92.05%
Waqfs	539	331	3.24%
Charitable Foundations	199	199	1.95%
Companies Limited by Guarantee	353	198	1.94%
Charitable Trusts	83	83	0.81%
Total		10,207	

71 This gives a total of 10,207 FATF NPOs in Mauritius. The great majority of FATF NPOs in Mauritius are Associations. They account for 92% of all FATF NPOs in the country.

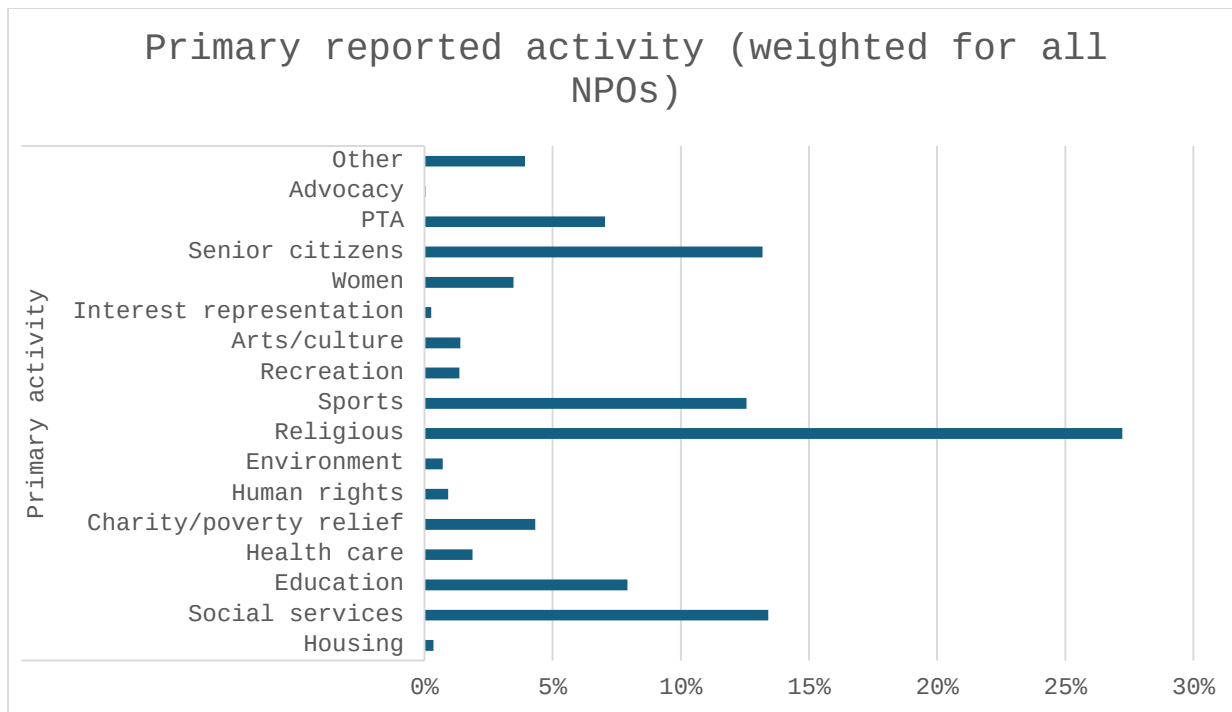
³³ 18, Best Practices Paper

³⁴ FATF Webinar, 18th December 2023.

³⁵ Data as of December 2025 (Associations, Charitable Foundations and Companies Limited by Guarantee); November 2025 (Waqf) and April 2025 (Charitable Trusts).

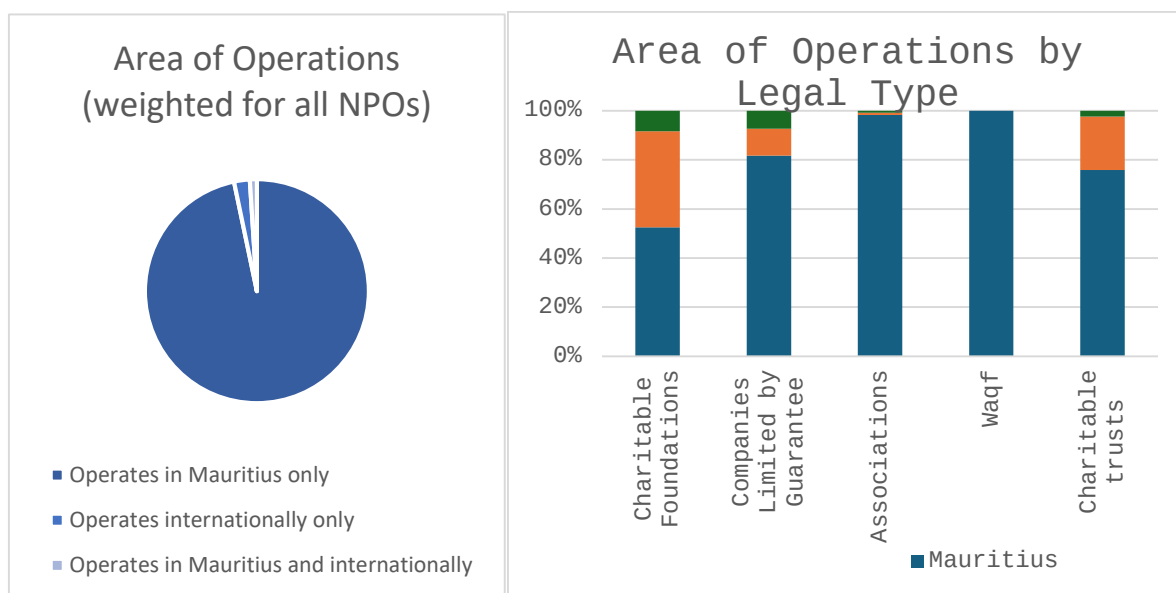
- 72 The survey asked NPOs to identify their primary activity, and the responses were weighted to calculate proportions for the entire sector of FATF NPOs. The results are provided in Figure 3 (below) and show that more than a quarter of all NPOs are religious. Social services, senior citizens groups and sports are the only other categories with more than 10% of responses.

Figure 3: Primary activities (Source: NPO surveys)



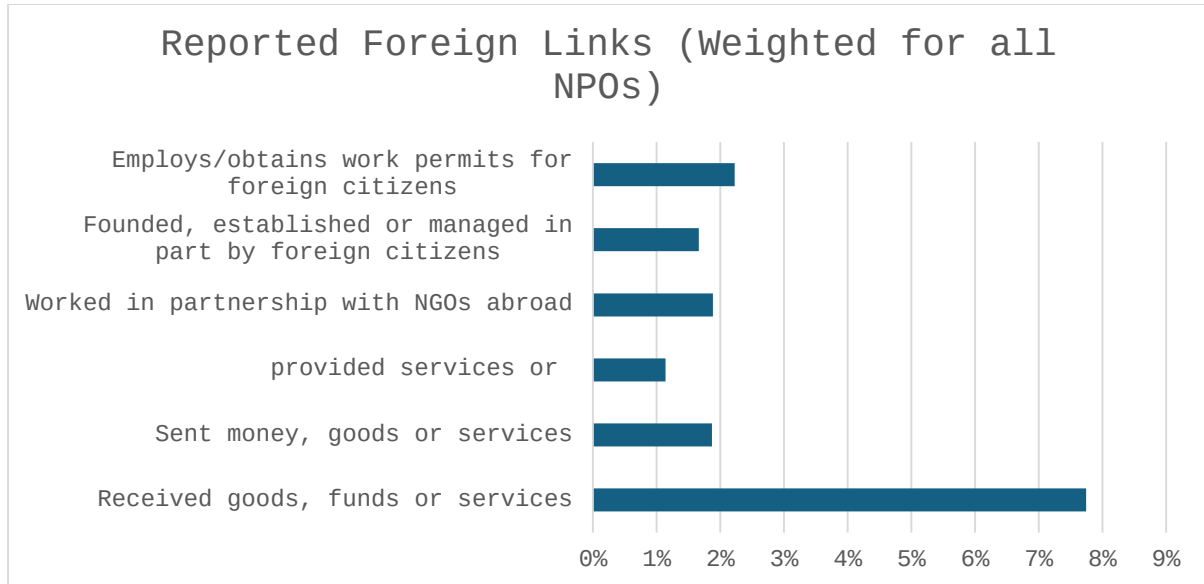
- 73 NPOs overwhelmingly operate in Mauritius (see Figure 4). Breaking those figures down, Figure 5 reveals that Charitable Foundations, Charitable Trusts and Companies Limited by Guarantee are significantly more likely to have foreign operations. No Waqf reported having foreign operations.

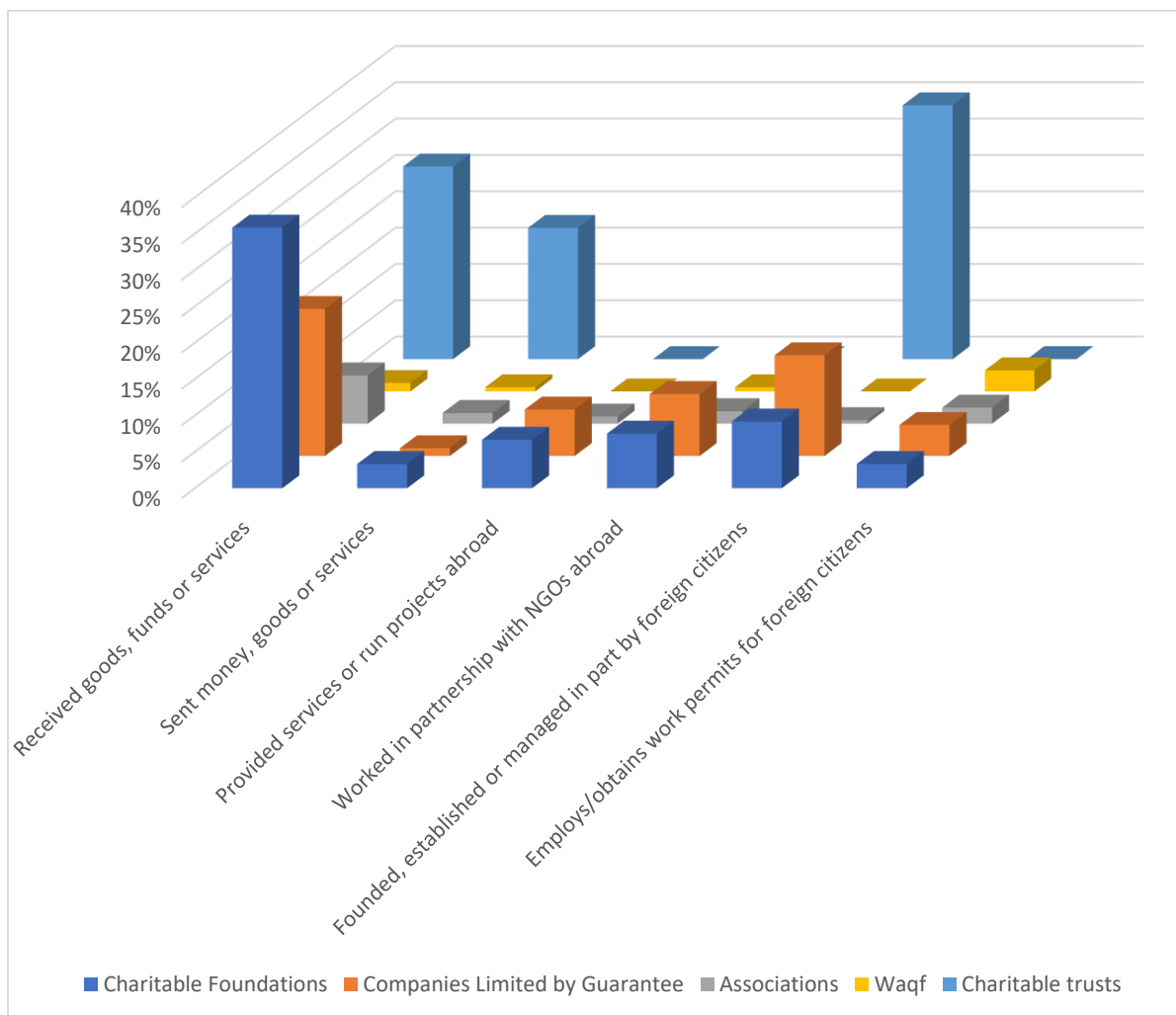
Figures 4 and 5: Area of Operations (Source: NPO surveys)



74 Furthermore, few NPOs report other foreign links (see Figure 6). Again, there are some notable differences in practices between different legal types. Particularly notable are the multiple foreign links reported by Charitable Trusts (see Figure 7).

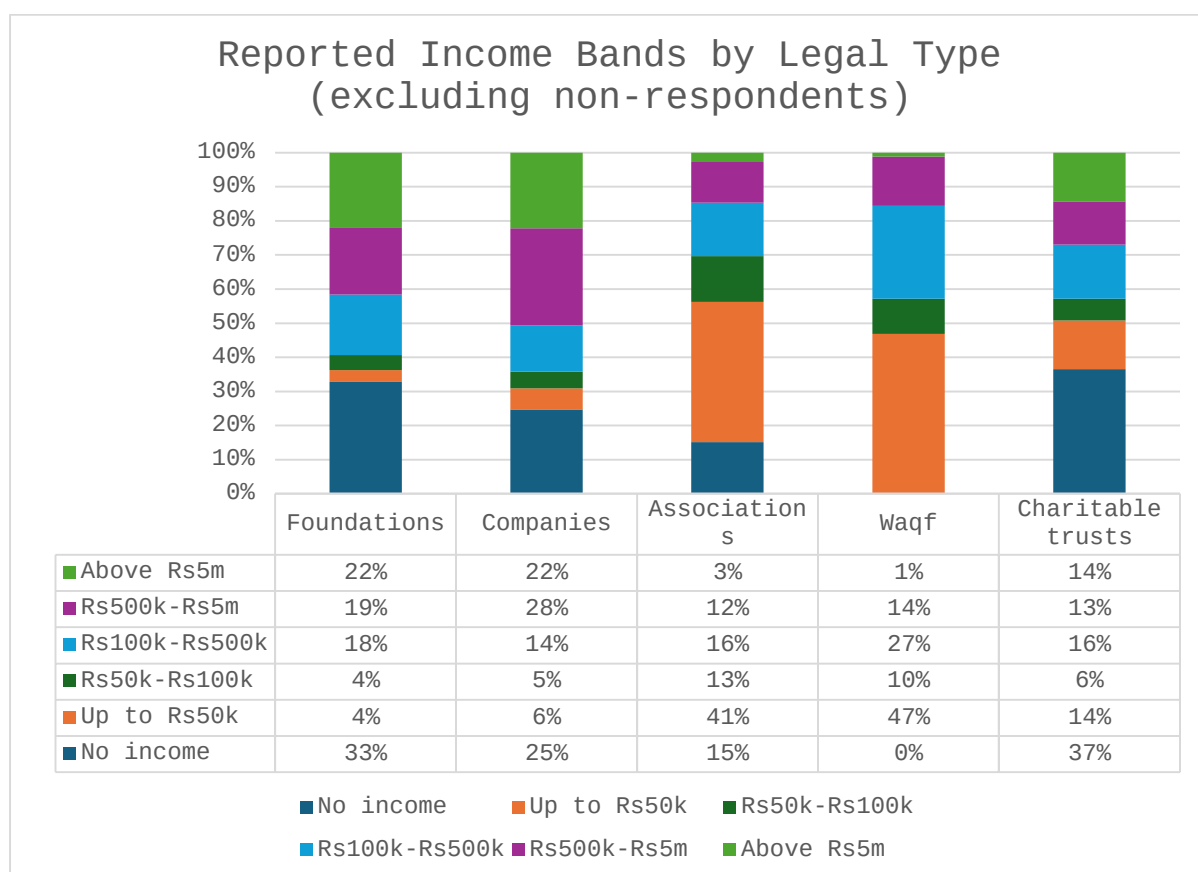
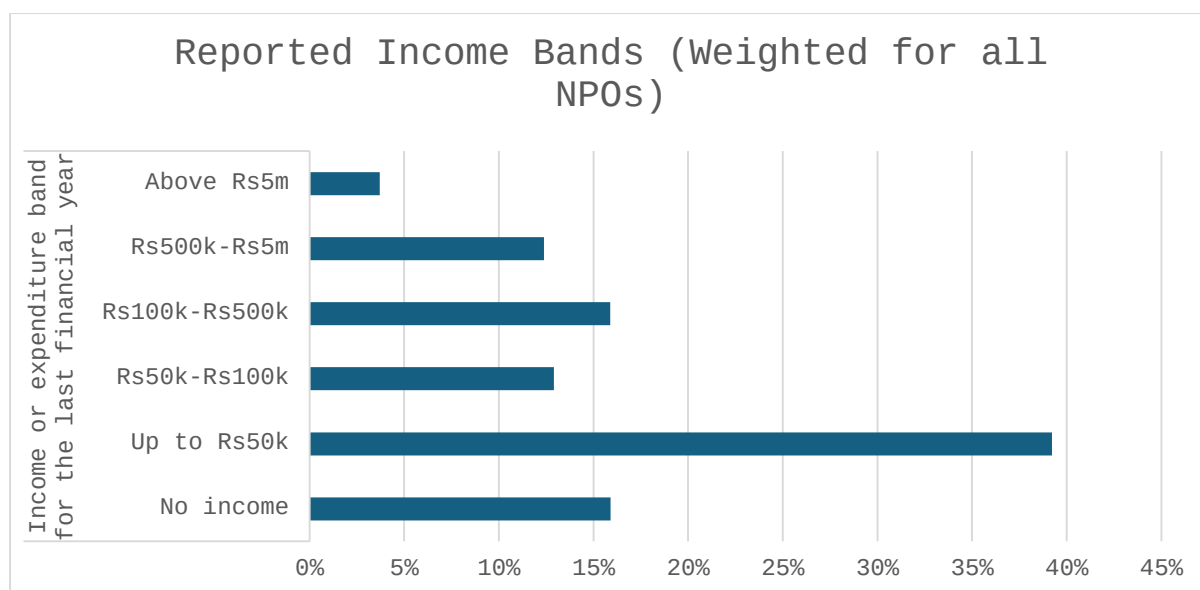
Figures 6 and 7: Reported Foreign Links (Source: NPO surveys)





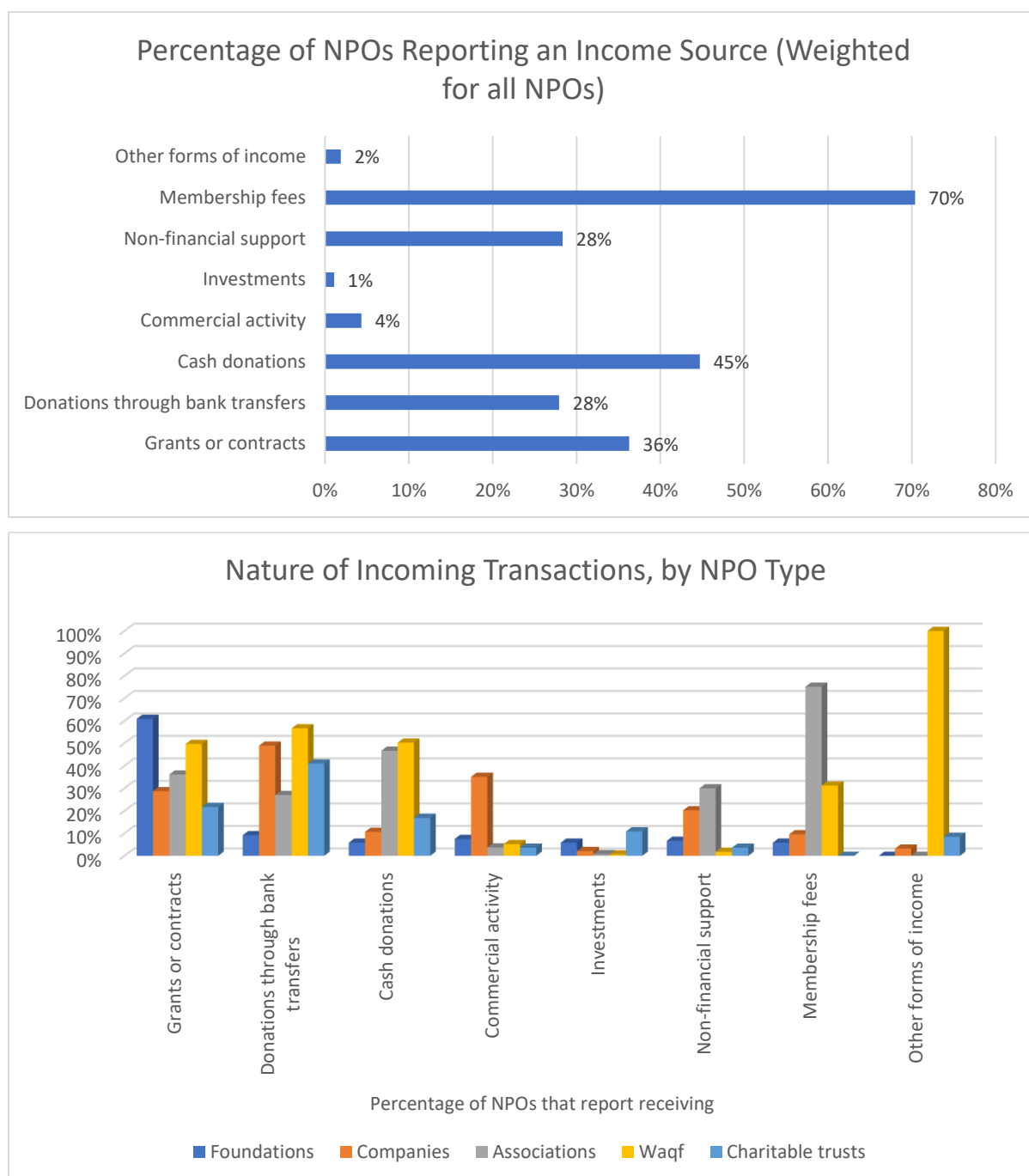
75 NPOs were asked to indicate their income for the previous year. Most NPOs (55.1%) reported income below MUR 50,000 a year (€950). As noted with other questions, there are significant variations between legal types. Associations and Waqfs are more likely to have lower incomes, whilst Charitable Foundations, Charitable Trusts and Companies Limited by Guarantee are likelier to report higher incomes.

Figures 8 and 9: Reported income bands (Source: NPO surveys)



76 Respondents were asked to indicate the nature of their incoming transactions. Weighted for all NPOs, it reveals that the most common form of income generation across the sector is membership fees (70%), followed by cash donations (45%). A breakdown by legal type reveals a more complex picture, with Associations and Waqfs more likely to benefit from the more informal methods of income generation.

Figures 10 and 11: Nature of Incoming Transactions (Source: NPO surveys)³⁶

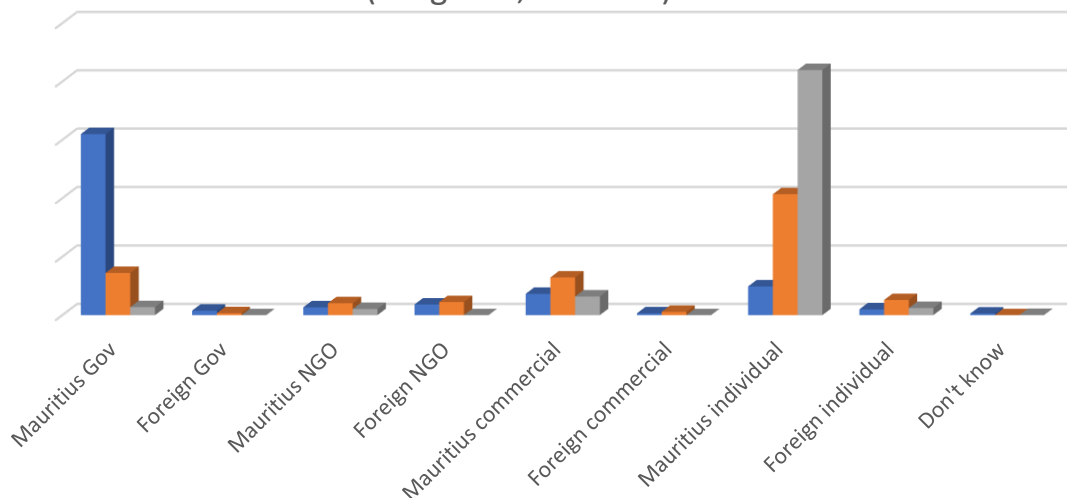


77 However, analysis of income sources mitigates potential risk concerns raised above. The responses show that the great majority of funds come from domestic sources. For example, whilst 42% of NPOs report cash donations from Mauritian citizens, just 1.2% report receiving funds from foreign nationals, and there are no reports of cash donations from any other foreign source.

Figure 12: Proportion of NPOs reporting funding types from stated sources (Source: NPO surveys)

³⁶ The question on 'other forms of income' clarifies that it includes any non-banking, non-cash donation (e.g. money service providers, crypto-currencies etc).

Proportion of NPOs receiving funding type from stated sources
(weighted, all NPOs)



	Mauritius Gov	Foreign Gov	Mauritius NGO	Foreign NGO	Mauritius commercial	Foreign commercial	Mauritius individual	Foreign individual	Don't know
■ Grant or contracts	31.0%	0.8%	1.3%	1.8%	3.6%	0.3%	4.9%	1.0%	0.3%
■ Donations through banks	7.2%	0.3%	2.0%	2.2%	6.5%	0.6%	20.7%	2.6%	0.0%
■ Cash donations	1.4%	0.0%	1.1%	0.0%	3.2%	0.0%	42.0%	1.2%	0.0%

Assessing the Terrorist Financing Risk to FATF NPOs in Mauritius

3.1 Methodological Approach to the Assessment of TF Risk

78 Paragraph 8.1 of the FATF Methodology states that “*not all organisations working in the not-for-profit realm in a country are inherently high risk*” and countries should “*conduct a risk assessment of these NPOs to identify the nature of TF risks posed to them.*”

79 IO 10 ask evaluators to consider “*to what extent does the Mauritius understand the level of risk of organisations that fall within the FATF definition of NPO, and the nature of TF threats posed to them?*” It asks countries to demonstrate that it “*has a good understanding of the terrorist financing risks.*”

Methodological Approach to the Risk Assessment

80 The Best Practice Paper states that “*A TF risk assessment is a product or process based on a methodology that attempts to identify, analyse and understand TF risk and serves as a first step in addressing them.*”³⁷

81 Scope of the assessment. FATF states that the risk assessment should cover ‘FATF defined NPOs’ (represented by the orange segment in Figure 13).³⁸

Figure 13: FATF NPOs (Source: Best Practices Paper).



82 Outcome of the risk assessment. The risk assessment should identify:

- The nature of the TF and terrorism threat;³⁹
- The nature of the TF risks posed to NPOs;⁴⁰
- The overall level of TF risks to NPOs;⁴¹
- Most at-risk NPOs.⁴²

³⁷ Paragraph 21, Best Practices Paper.

³⁸ Paragraph 21, Best Practices Paper.

³⁹ Example b.10. Immediate Outcome 10; Paragraph 24, Best Practices Paper.

⁴⁰ 6b, Interpretive Note to Recommendation 8.

⁴¹ 8.1(b) of the FATF Methodology, and Notes to Assessors and Example b.10 from Immediate Outcome 10.

⁴² Example b.10. Immediate Outcome 10; see also figure 10 (above), from Best Practices Paper.

83 FATF states that “NPOs are at varying degrees of risk of TF abuse by virtue of their types, activities or characteristics”.⁴³ It recognises that “the majority [of NPOs] may represent low risk”⁴⁴ and “In most circumstances, only a marginal portion of NPOs would be facing a “high risk” of TF abuse...”⁴⁵ Accordingly, “Some authorities decide to categorise NPOs according to the different levels of risks they may face, for example low, medium to high.”

84 Considerations: The following factors may be considered as part of the risk assessment:

- “broader criminal networks and activities, which terrorist organisations often draw on to raise, and move, funds or other assets”⁴⁶
- “the country’s prevailing TF methods, techniques and trends”,⁴⁷ and in particular “the characteristics of the domestic and cross-border TF activity (e.g. collection, movement and use of funds or other assets)”⁴⁸
- The “TF vulnerabilities of the NPOs and products”⁴⁹
- “the jurisdiction’s general CFT capacity and effectiveness.”⁵⁰

85 Sources of Information. Section 1.2 (above) provides details on the data and sources used in this risk assessment, including details on the government, NPO sector and private sector agencies consulted.

⁴³ Footnote 59, the FATF Methodology.

⁴⁴ Footnote 59, the FATF Methodology.

⁴⁵ Paragraph 21, Best Practices Paper.

⁴⁶ Paragraph 25, Best Practices Paper.

⁴⁷ Notes to Assessors, Immediate Outcome 10.

⁴⁸ Notes to Assessors, Immediate Outcome 10.

⁴⁹ Paragraph 24, Best Practices Paper.

⁵⁰ Paragraph 24, Best Practices Paper.

3.2 The General Threat Context in Mauritius

General Criminal Threat Context in Mauritius

- 86 The NRA (2025) notes that Mauritius is a small nation which has emerged to become an upper-middle-income economy and a region-leading International Financial Centre. The report mentions its strong performance on a range of international metrics relating to governance, economic freedom, democracy, property rights, peace, free zones and innovation. In this context, the ML threat was assessed as Medium-High. Three predicate offences were rated as high in both the 2020 and 2025 NRAs, namely: illicit trafficking in drugs; fraud, including electronic fraud; and illegal bookmaking. Robbery/theft (larceny) and corruption are listed as medium-high threats; with tax crimes, trade-based money laundering, and human trafficking listed as medium threats.
- 87 The Global Peace Index 2025 ranks Mauritius 26th globally (out of 163 countries). It has been ranked 1st in the African region for 17 consecutive years. Key indicators contributing to Mauritius' high ranking include its low crime rates, political stability, economic growth, secure environment and effective governance.

Terrorist Threat in Mauritius

- 88 The NRA (2025) assessed the terrorist threat level in Mauritius as Medium-Low. There is no known-terrorist organisation or individual physically or actively operating within the Mauritian jurisdiction. There were indications that some individuals were influenced by extremist ideologies and propaganda, and the number has slightly increased in the past years.
- 89 Law enforcement officials had concerns over recent global events and the propaganda that has resulted on the domestic security environment. While Mauritius has not recorded any organised extremist activity, security service monitoring indicates sporadic expressions of sympathy and ideological alignment with foreign conflicts across social media platforms. These remain largely rhetorical, with no operational intent detected to date. The relevant intelligence agencies continue to collaborate closely with the relevant competent authorities to detect any early signs of radicalisation, online crowdfunding⁵¹ or material support networks that may emerge locally in connection with international events.

Terrorist Financing Threat in Mauritius

- 90 There is one significant case involving TF linked to two Mauritians accused of travelling to join the Islamic State of Iraq and Syria (ISIS) in 2014 and 2015. They have been declared as designated parties under Section 9(2) of the United Nations (Financial Prohibitions, Arms Embargo and Travel Ban) Sanctions Act 2019 in June 2025. Three of their relatives were arrested in 2024 and charged for the offence of TF under the Convention for Suppression of Terrorism Financing 2003. No involvement of NPOs is suspected.
- 91 The NRA rates the overall TF risk for Mauritius as 'Medium-Low'. The national TF threat and the TF vulnerability were also assessed as 'Medium-Low'. The NRA notes that Mauritius could be vulnerable to serving as a conduit for illicit flows tied to terrorism, particularly given its status as an international financial hub with a strong banking system and a high volume of cross-border transactions.
- 92 The NRA reports that two distinct modes of TF activities have been observed in the last few years, namely (i) the cross-border movement of funds by suspected FTFs to a Mauritian citizen embracing ISIS ideologies; and (ii) the raising and outward movement of funds to support FTFs through locals as well as foreign intermediaries which have been identified as terrorist financiers.

⁵¹ Does not refer/have the same meaning as 'Investment-Based Crowdfunding' defined under Financial Services (Crowdfunding) Rules 2021 issued by the FSC.

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- 93 Domestically, the funds raised and channelled to FTFs were from legitimate sources, mainly through donations, and other means, such as salary and pension. Intelligence tended to suggest that social media could be exploited as a vehicle to raise funds which could also be used for terrorism activities.
- 94 Foreign nationals having suspected links with terrorist organisations/groups could be seeking opportunities to channel funds through companies in Mauritius. The identified methods used for raising funds are donations and online crowdfunding, whereas the channels used for transferring funds are wire transfers and MVTs.
- 95 While Mauritius has not been directly linked to major TF cases, the NRA identifies several risk factors. These include possible misuse of companies and the use of MVTs for incoming and outgoing funds.
- 96 Interviews with officials noted that the risk from FTF had diminished, specifically in relation to ISIS. However, concerns were increasing about the impact of international events on the domestic security environment, and the potential for these sentiments to be exploited, particularly through social media networks.
- 97 Officials stated that Mauritius has strengthened its framework to identify and address TF risks since 2020, as reflected in Mauritius' progress under the FATF follow-up process following the 2018 Mutual Evaluation. Measures are being undertaken to ensure good understanding of the risk and to be able to proactively identify any abuse that would occur.

3.3 Data on the Terrorist Financing Risk to NPOs in Mauritius

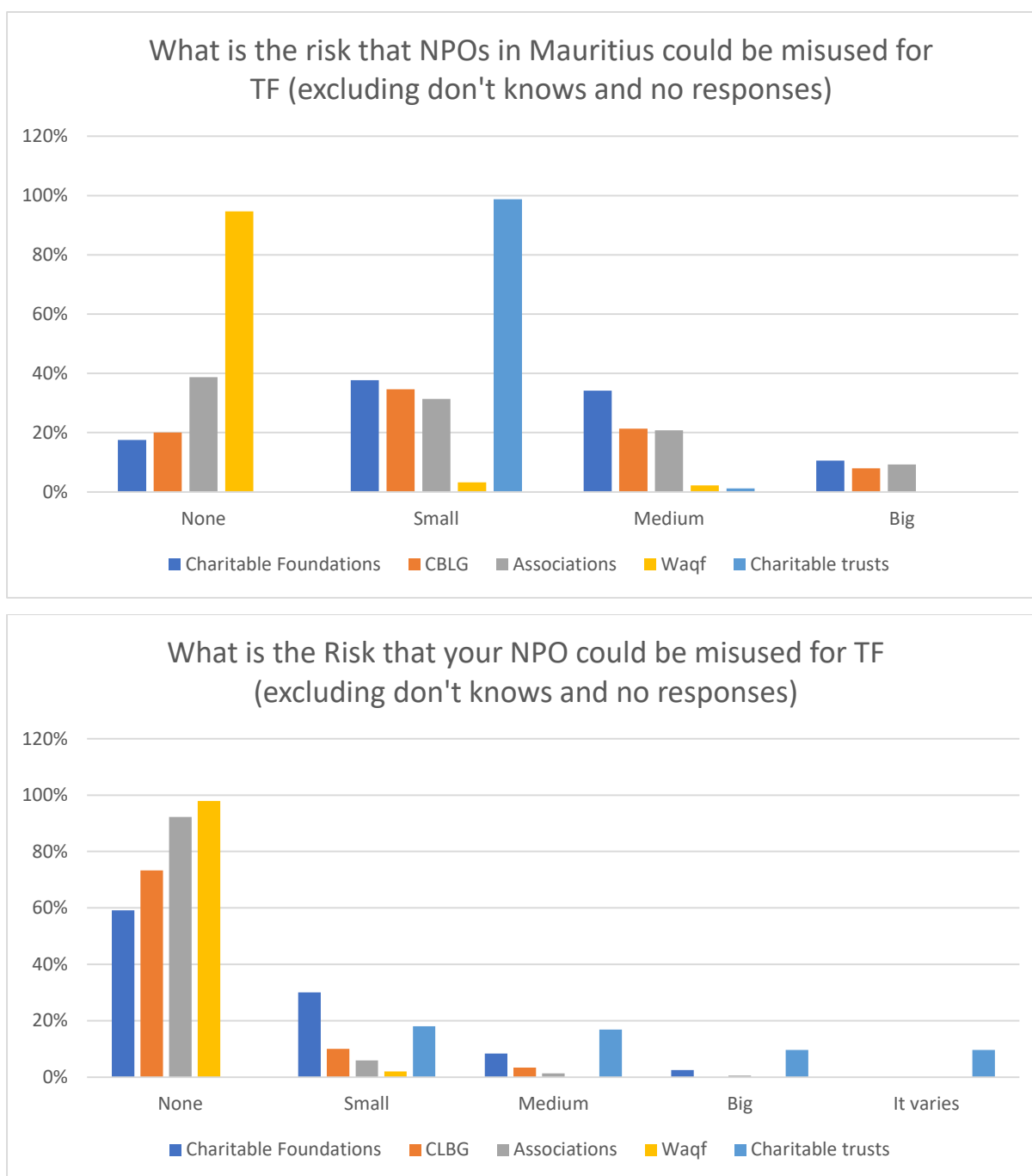
Quantitative Evidence of Terrorist Financing Abuse of NPOs

- 98 Written requests for data on convictions, prosecutions, security or intelligence actions, investigations or regulatory interventions involving NPOs and TF since 2020 were sent to the relevant competent authorities such as the ROA, the ROC, the ROF, the AGO, the MPF, the MRA, the BOM, the FCC and the FIU. These agencies were all interviewed in May 2025 and November 2025 on their responses, along with officials from the FSC and the BOWC.
- 99 An inspection of a financial institution identified gaps in the application of proper due diligence on cross border transactions carried out by an NPO client. Accordingly, the financial institution was sanctioned by the competent authority. However, there was no evidence of TF abuse.
- 100 Officials noted that whilst the total number of STRs has more than doubled between 2018-2024, the number involving NPOs continues to be consistently very small. The number of STRs relating to NPOs for the period January 2020 to December 2024 was 18 in total. Only 3 of the STRs involved concerns terrorism.
- 101 The STRs highlight a diverse risk profile across NPO types, with varying levels of transparency, governance and exposure to TF vulnerabilities. The requests for information received by the FIU show a focused engagement from competent authorities on NPOs.
- 102 The NRA (2025) reported no specific links between NPOs and terrorist financing. No other concerns were identified in any other official analysis or credible sources.

Perceptions of the Potential Terrorist Financing Risk to NPOs in Mauritius

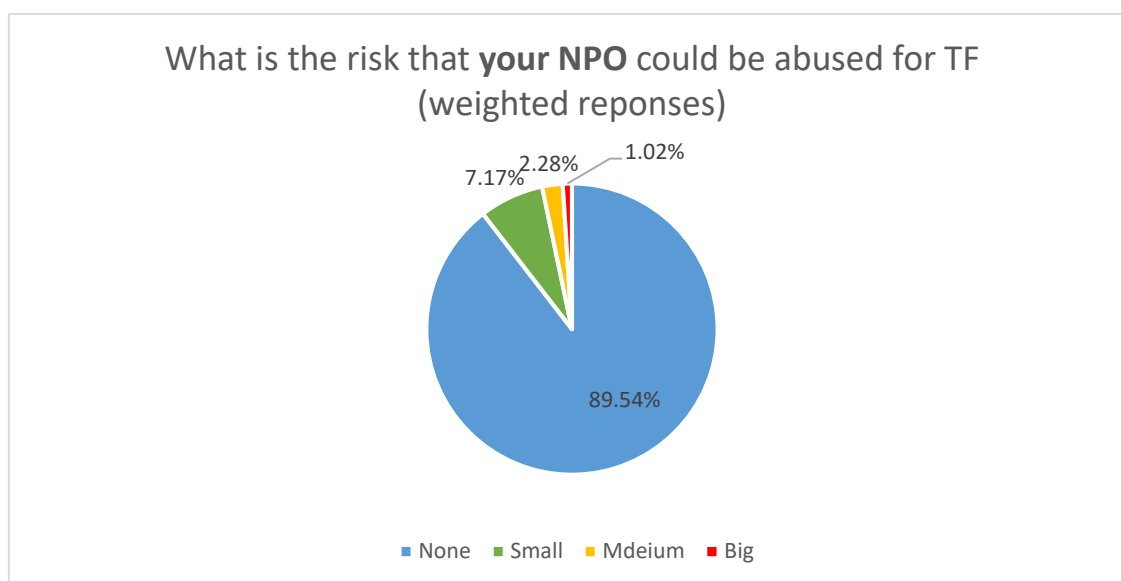
- 103 The NRA (2025) provided no specific analysis of the potential terrorist financing to NPOs. However, the analysis of the Trust and Company Service Providers sector (TCSPs) does cover Charitable Trusts, which are managed by TCSPs. Charitable Trusts are highlighted as one of two potential TF risks to TCSPs, but no specific cases or suspicions are noted. The analysis further notes that TCSPs have instituted necessary safeguards, reinforced by a robust licensing regime and ongoing supervision. It rates the TF risk to the overall sector as Medium-Low, and recommends further actions be taken to increase TF risk understanding and specific CFT mitigating measures.
- 104 Officials from regulatory and supervisory authorities, law enforcement and intelligence agencies, the AGO and the BOM were asked to assess the level of TF risk to NPOs. All rated the risk as low or, in the case of the intelligence agencies, very low.
- 105 Officials were asked to consider areas of potential risk, given the lack of direct evidence of abuse. Three concerns were raised by law enforcement and supervisory authorities: the raising of funds in Mauritius for humanitarian causes in high-risk jurisdictions overseas, NPO links with high-risk jurisdictions, and the use of social media or virtual assets to raise, store or move funds.
- 106 Two other areas of risk were discussed and assessed as less risky due to the mitigating measures in place. Firstly, it was acknowledged that the perceived opacity of Charitable Trusts is a challenge, but noted that they benefit from an additional level of scrutiny given the role of management companies and qualified trustees. Officials were confident that any illicit activity would be identified. Secondly, whilst officials were concerned about outgoing funds, the strict monitoring of incoming and outgoing funds led to an assessment that this was not an area of concern.
- 107 The NPO survey assessed NPOs' perception of the TF risk. It revealed that most NPOs thought the risk of TF abuse was small or none, particularly in their own NPO, and in consideration of the previous NPO risk assessment.

Figures 14 and 15: NPOs' Perceptions of Terrorist Financing Risk (Source: NPO survey)



108 As Figure 15 shows, a very small number of NPOs assess themselves as being at TF risk. Importantly 35 of the 45 survey respondents that rate their own NPO as being medium or high risk are Charitable Foundations or Charitable Trusts. But these account for just 4% of the total sector. Figure 16 weights the responses, to give us a view of the whole sector's perception of their exposure to TF risk. This shows that 90% of NPOs assess their risk as 'none', 7% as 'low', 2% as 'medium', and 1% as 'big'.

Figure 16: NPOs' perceptions of terrorist financing risk - weighted (Source: NPO survey).



109 The donor community unanimously agreed that the risk of TF may lie with funds coming in or going out of the country. However, the donor community have funding criteria for NPOs to adhere to, monitor and ensure compliance that the funds are being used for the intended purposes. For instance, NPOs are required to provide proof of payments made to ascertain that funds were being used for the agreed objectives, donors also indicated that they ensure oversight on the charitable activities that they sponsor by either effecting onsite visits or directly implementing the projects of NPOs. As such, they are of the view that the NPOs they deal with are genuine and very unlikely to being used for TF.

3.4 Comparative Analysis of Regional and Global Assessments

110 Mauritius is a small and relatively low risk jurisdiction. These factors mean that there is limited primary data on TF risks in its NPO sector. FATF states that “*information from foreign authorities can help provide competent authorities with a better understanding of the TF risk environment in which NPOs are operating, and context surrounding instances of abuse and circumstances of risk.*”⁵² This section contains a comparative analysis of assessments from the region and globally to identify areas for consideration as a potential terrorist financing risk in the Mauritius context.

NPO Terrorist Financing Risk Assessment from the region

111 The following risk assessments from the broader region and similar jurisdictions were consulted to provide comparative and contextual analysis. A summary of their conclusions is provided in Table 7.

- Jersey: *National Risk Assessment of Non-Profit Organisations of the Bailiwick of Jersey* (Government of Jersey, 2022);
- Seychelles: *Terrorist Financing Risk Assessment for the NPO Sector in Seychelles* (unpublished, 2023);
- British Virgin Islands: *2024 Virgin Islands Non-Profit Organisations Terrorist Financing Risk Assessment* (FIA, 2024);
- Trinidad and Tobago: *National Risk Assessment: Assessing the Risk of Abuse of Non-Profit Organisations (NPOs) for Terrorist Financing* (unpublished, 2024).

Table 7: Comparison of NPO TF Risk Assessment findings from similar jurisdictions.
(Sources: as stated)

Jurisdiction	Overall Risk	Specific potential risk factors noted
Jersey	MEDIUM-LOW	Operate in higher risk jurisdictions; Use of partners; Use of money remittance methods such as cash.
Seychelles	LOW	Proximity to communities sympathetic to extremist causes; Unregistered NPOs; Funding from foreign sources; Unverifiable funding sources; Unverifiable controllers of NPOs; Foreign infiltration of religious associations; Trusts and foundations (that meet the FATF definition of NPO).
British Virgin Islands	LOW	‘Service provision’ NPOs; Cross-border activities; Foreign affiliation and/or control.
Trinidad and Tobago	LOW	Educational and social NPOs (medium inherent vulnerability); Cross-border transactions in high-risk jurisdictions; Use of wire transfers and remittances; De-risking disrupting legitimate activities.

112 None of the assessments identified any specific suspicions or instances of TF abuse of NPOs in their jurisdictions. The assessments all concur that the overall TF risk to NPOs in their jurisdictions is low/low-medium.

⁵² 79, Best Practices Paper

- 113 The analysis concurs on a potential risk related to cross-border activity, be it operations (British Virgin Islands, Jersey) or movement of funds (Seychelles, Trinidad and Tobago), particularly where it involves high-risk jurisdictions (Jersey; Trinidad and Tobago).
- 114 Ethnic or religious NPOs are identified as being more exposed to risk in Seychelles. Trinidad and Tobago identified educational and social NPOs as being more exposed.
- 115 Concerns about unverifiable funding methods were mentioned in all assessments except British Virgin Islands, with specific concerns about money remittances (Jersey, Trinidad and Tobago); and cash (Jersey).
- 116 Concerns about foreign or unverifiable controllers were identified in British Virgin Islands and Seychelles. Similarly, Seychelles identified risks from specific legal vehicles or structures associated with their position as international financial centres.
- 117 Trinidad and Tobago identified risks to NPOs legitimate activities arising from de-risking by financial institutions.

Assessments of the Global TF Risk to NPOs

- 118 Without prejudice to a jurisdiction's assessment of its own risk, FATF notes some risks, vulnerabilities and typologies. Chiefly this comprises specific risks raised in the recommendations and guidance, and more focused analysis in the *Risk of Terrorist Abuse in Non-Profit Organisations* (FATF, 2014), referred to in the report as the 'Typologies report'.
- 119 Recommendation 8 states that its purpose is to protect NPOs from terrorist financing abuse, including:
- “(a) by terrorist organisations posing as legitimate entities;*
- (b) by exploiting legitimate entities as conduits for terrorist financing, including for the purpose of escaping asset-freezing measures; and*
- (c) by concealing or obscuring the clandestine diversion of funds intended for legitimate purposes to terrorist organisations.”⁵³*
- 120 The *Typologies Report* (2014) identifies five categories of abuse or risk:
- **The diversion of funds.** The most common observed form of abuse in 2014, most often involving actors internal to the NPO (although abuse by external actors is also noted). At the fundraising phase, the interception of cash was predominant. By contrast, multiple avenues were abused in the retention and transfer phase, including regulated channels.
 - **Affiliation with a terrorist entity.** Cases range from informal personal connections between NPO directing officials and terrorist entities, to more formalised relationships between NPOs and terrorist entities. Cases encompassed all phases in the collection, transfer, retention and expenditure of resources, and delivery of programmes.
 - **Support to recruitment efforts.** Instances where NPO resources were used to promote causes directly associated with terrorist violence were observed at the collection, transfer and delivery phases of NPO operations, both domestically and internationally. This includes hosting events, and the publishing and distribution of materials supporting terrorism.
 - **Abuse of programming.** This covers cases where the flow of resources was legitimate, but NPO programmes were abused at the point of delivery. Case studies demonstrate varying levels of involvement of actors both internal and external to NPOs.

⁵³ FATF Recommendation 8.

- **False representation.** Either the establishment of ‘sham’ NPOs; or persons falsely representing themselves as agents of legitimate NPOs. The purpose is to raise funds, promote causes or carry out other activities in support of terrorism.

121 Other observations from the Typologies Report include:

- The NPOs most at risk are:
 - those engaged in ‘service’ activities (with no cases observed in ‘expressive’ NPOs);
 - those who operate in an area of conflict with terrorist activity;
 - those who operate within a population that is actively targeted by a terrorist movement for support and cover.
- Homegrown and self-starter entities also pose a threat to the NPO sector, and a focus on foreign activities risks leaving domestic NPO activities open to abuse.
- Other vulnerabilities include extended logistical networks; a large transitory workforce; high operational capacity in terms of resources, access to networks, and substantial public trust; and strategic shocks (such as natural disasters) that result in a spike in demand for NPO funds.

122 The Interpretive Note and Best Practices Paper note that NPOs enjoy public trust, which gives some NPOs access to considerable sources of funds; some NPOs operate in cash-intensive contexts; and some have a global presence that provides a framework for national and international operations and financial transactions. In rare cases, terrorists and terrorist organisations may exploit these features of NPOs to:

- raise and move funds,
- provide logistical support
- encourage terrorist recruitment
- provide a veil of legitimacy
- or otherwise support terrorist organisations and operations.⁵⁴

123 The Interpretive Note highlights that terrorist organisations may exploit NPOs by infiltrating them to misuse funds and operations to cover for, or support, terrorist activity; or create sham NPOs or engage in fraudulent fundraising for these purposes.⁵⁵

124 By contrast, NPOs may be considered low risk if they *“are not conducting activities in direct proximity (domestically or abroad) to active threat areas or populations, do not receive funding from entities in proximity to active threat areas, or do not move funds to or through such areas. Such considerations may be particularly relevant for NPOs working domestically in countries that have a low exposure to TF risks in general.”*⁵⁶

125 The FATF publication *Crowdfunding for Terrorism Financing* (2023)⁵⁷ notes the abuse of humanitarian, charitable or non-profit causes as one of four typologies. Often this does not involve ‘FATF-defined’ NPOs. However, cases were observed involving sham NPOs, and other cases involving legitimate NPOs whose operations in high-risk environments were subsequently abused.

⁵⁴ 3, Interpretive Note to Recommendation 8 and 2, Best Practices Paper.

⁵⁵ 3, Interpretive Note to Recommendation 8.

⁵⁶ 43, Best Practices Paper.

⁵⁷ <https://www.fatf-gafi.org/en/publications/Methodsand Trends/crowdfunding-for-terrorism-financing.html>

3.5 The Terrorist Financing Risk to NPOs in Mauritius

The Nature of the TF and Terrorism Threat⁵⁸

- 126 The latest and most comprehensive analysis of the terrorism and TF threat is provided in the National Risk Assessment published in May 2025. It concluded that the overall TF risk in Mauritius is Medium-Low. The rating was derived from a combination of the National TF Threat and the National TF Vulnerability, which were both rated Medium-Low.
- 127 At the time of drafting the report, no individual or entity in Mauritius has been prosecuted or convicted for terrorism activities. One case of TF is ongoing involving seven individuals from one family, five of whom are Mauritian nationals. There is also an ongoing investigation involving the abuse on online crowdfunding platforms and online payment service providers.

The Overall Level of TF Risks to NPOs⁵⁹

- 128 There is no evidence of TF abuse of NPOs in Mauritius. The 2025 NRA records no incidences. All competent authorities were asked to provide in writing and in person information on any terrorist financing incidents involving NPOs since the last NPO TF Risk Assessment in 2020. No convictions or prosecutions involving NPOs and TF were reported. None of the investigations conducted by the MPF have uncovered any evidence of TF abuse of NPOs. Three STRs involving NPOs and concerns about terrorism were recorded, with information referred to authorities in Mauritius and overseas. No evidence of abuse was subsequently found. Open-source analysis found no cases.
- 129 Interviewed officials all stated that they assessed the risk as none, very low or low. The survey shows that 90% of NPOs state that they face no risk from TF, with a further 7% rating their exposure as low.
- 130 A lack of evidence of abuse is not necessarily proof that no abuse has occurred or that the risk is low. Nevertheless, confidence in a 'low risk' assessment is high for two reasons. First, Mauritius has made considerable improvements in its capabilities in identifying, investigating and prosecuting TF since 2020, and are confident that any abuse would be identified. Secondly, comparative analysis with four jurisdictions with similar characteristics suggests that an assessment of the TF risk to NPOs as low would be entirely consistent with the experiences of peers. None of the four jurisdictions analysed found any suspicions or evidence of TF abuse of NPOs, and all concluded that the overall TF risk to NPOs was low or low-medium.
- 131 In conclusion, **the risk of terrorist financing abuse of NPOs in Mauritius is assessed as Low.**

Risk of Terrorist Financing Abuse of NPOs in Mauritius: LOW

⁵⁸ Example b.10. Immediate Outcome 10; Paragraph 24, Best Practices Paper.

⁵⁹ 8.1(b) of the FATF Methodology, and Notes to Assessors and Example b.10 from Immediate Outcome 10.

The Nature of the TF Risks posed to NPOs⁶⁰ and Identification of NPOs Most Likely to be Exposed to a Terrorist Financing Risk

- 132 The 2025 NRA reports two distinct modes of TF activities that have been observed in the last few years, namely (i) the cross-border movement of funds by suspected FTFs to a Mauritian citizen embracing ISIS ideologies; and (ii) the raising and outward movement of funds to support FTFs through locals as well as foreign intermediaries which have been identified as terrorist financiers.
- 133 The NRA noted the potential vulnerability of Charitable Trusts to TF, although officials noted the additional layer of supervision given the role of reporting persons in their management (see section 4.4 for details).
- 134 Officials raised concerns about the impact of international events on the domestic security environment, and the potential for these sentiments to be exploited, particularly through social media networks. The potential for social media to facilitate fund-raising was also noted as a risk factor. The ML/TF risk from virtual assets and VASPs was assessed as 'very high' in 2021. One case involving online crowdfunding and the use of online payment service providers remains under investigation.
- 135 Consequently, four main risk factors are identified. Three higher-risk categories are:
1. The raising of funds by NPOs in Mauritius for humanitarian causes in high-risk jurisdictions, with the risk that these funds are used to support FTF or otherwise diverted for the benefit of terrorist groups in these jurisdictions.
 2. NPO links with high-risk jurisdictions, with two potential misuses. First, the potential for NPOs to be used as vehicle for funds to be sourced from or sent to terrorist groups or sympathisers in these jurisdictions; secondly, the potential for foreign nationals sympathetic to extremist causes to control NPOs in Mauritius.
 3. The possible use of online crowdfunding or virtual assets to raise or move funds by or through NPOs for terrorist financing purposes.
- 136 One medium-risk category is:
1. Charitable Trusts, and the potential for these NPOs to be used to obscure the raising, holding or transfer of funds for terrorist financing purposes.
- 137 It is reiterated that there is no specific evidence that these types of NPO or NPO activities have been abused in the ways set out above, or in any other way for TF purposes.

Proportion of NPOs in each of the risk categories

- 138 Sending humanitarian funds overseas. No specific data is available for the amount of humanitarian funds sent overseas. 4.3% of NPOs have charity/poverty relief purposes, according to the survey. Separately, 1.9% of NPOs reported that they 'sent money, goods or services overseas'; 1.1% 'provided services or ran projects overseas'; and 1.9% 'worked in partnerships in NPOs abroad'. If these four variables were completely independent, it would imply that less than 0.1% of NPOs support charity or poverty relief overseas. However, it can be assumed that there is significant overlap; an NPO that 'sends money overseas' is more likely to also 'work in partnership with NPOs abroad'; and may also be assumed that charity/poverty NPOs are more likely to work overseas. If this overlap was perfect, then a maximum of 1.9% of NPOs would send funds for humanitarian purposes overseas.
- 139 Links with foreign jurisdictions. The survey provides data on six categories of NPOs' foreign links. Officials stated that they do not consider the receipt of funds from foreign sources to be high risk. For the remaining five categories, the highest response rate was 2.2% (see table 8). As before, the data does not inform if these variables are entirely independent or if there is overlap; but it is assumed that

⁶⁰ 6b, Interpretive Note to Recommendation 8.

there will be significant overlap, and that the total number of NPOs with any foreign links is unlikely to exceed 4%.

Table 8: Selected foreign links of NPOs. (Source: NPO Survey)

Reported Link	Total
Sent money, goods or services	1.9%
Provided services or ran projects abroad	1.1%
Worked in partnership with foreign NPO	1.9%
Founded, established or managed in part by foreign citizens	1.7%
Employs or obtains work permits for foreign citizens	2.2%

- 140 Links with ‘high-risk’ jurisdictions. The above data refers to any foreign links. It does not distinguish high-risk jurisdictions from safer jurisdictions.
- 141 Possible use of online crowdfunding or virtual assets to raise or move funds. The survey asked NPOs if they “*receive donations or funds in any other ways? This includes any non-banking, non-cash donation (e.g. money service providers, crypto-currencies etc.)*” The question does not specifically mention online crowdfunding, although it would be covered here. It also only relates to fund-raising, and not the storing or dispersal of funds. These caveats aside, the results strongly suggest that these are not common practices. A total of 10 respondents (0.3%) responded positively to this question.
- 142 Foreign nationals having suspected links with terrorist organisations/groups could be seeking opportunities to channel funds through companies in Mauritius. The identified methods used for raising funds are donations and online crowdfunding, whereas the channels used for transferring funds are wire transfers and MVTs.
- 143 The regulation of VASPs is at a nascent stage. The FSC stated that 11 Virtual Assets Service Provider licences have been issued to seven companies under the Virtual Asset and Initial Token Offerings Services (VAITOS) Act 2021. No data has been obtained on the volume of transactions in general or in relation to NPOs.
- 144 Charitable Trusts. As shown in section 2.2 above, there are 83 Charitable Trusts in Mauritius, comprising 0.8% of the total of FATF NPOs.
- 145 Bringing the above data together, Table 9 estimates that 98% of NPOs in Mauritius are low or no risk for TF purposes.
- 146 Table 9 summarise the estimated proportion of NPOs in the four risk categories. The risk categories are not absolute assessments of the TF risk for each of these categories, but reflect the relative levels of risk of these sub-categories within the overall context of a low risk sector. An unknown amount of overlap between NPOs in the four categories is possible, but given the small proportions is likely to be minimal.

Table 9: Proportion of low, medium and high risk NPOs in Mauritius.

Risk factor	Risk category	Estimated proportion of total NPOs
The raising of funds in Mauritius for humanitarian causes in high-risk jurisdictions.	Higher risk	> 0.5%
Links with high-risk jurisdictions.	Higher risk	> 0.5%
Possible Use of online crowdfunding or virtual assets to raise or move funds.	Higher risk	0.3%
Charitable Trusts.	Medium risk	0.8%
All other NPOs.	Lowest risk	98%

Assessment of Measures to Mitigate the Terrorist Financing Risk to NPOs in Mauritius

4.1 Methodological Approach to Assessment of Mitigating Measures

Requirement to Assess

- 147 Recommendation 8 states that *“Countries should have in place focused, proportionate and risk-based measures, without unduly disrupting or discouraging legitimate NPO activities, in line with the risk-based approach. The purpose of these measures is to protect such NPOs from terrorist financing abuse.”*
- 148 As elaborated in IO 10, 8.1(c) of the FATF Methodology, and paragraphs 6 and 7 of the Interpretive Note, this requires an assessment of the mitigating measures for identifying, preventing or combatting TF abuse of NPOs.
- 149 The Best Practices Paper acknowledges that the risk assessment may focus on identifying possible threats but emphasises that *“it is important to bear in mind that equal attention should be paid to identifying the vulnerabilities in the legal and regulatory framework, and/or self-regulatory measures that govern NPOs or in their practices.”*⁶¹

Scope of the Assessment and Special Cases

- 150 Only mitigating measures which apply to NPOs which fall within the FATF definition should be considered.⁶² For these NPOs, the assessment should consider:
- How well do NPOs understand the nature of TF threats posed to them; and
 - To what extent are measures taken to identify, prevent and combat TF abuse of NPOs without unduly disrupting or discouraging legitimate NPO activities.
- 151 There are two special cases:
- NPOs suspected of being exploited by, or actively supporting terrorist activity or terrorist organisations, to which additional requirements apply.⁶³
 - NPOs identified as being at low risk of TF abuse, to which simplified requirements apply.⁶⁴

Measures to Identify, Prevent and Combat Terrorist Financing Abuse

- 152 Four elements should be used to identify, prevent and combat TF abuse of NPOs without unduly disrupting or discouraging legitimate NPO activities. These are:
- (i) Sustained outreach to the sector concerning TF issues;
 - (ii) Focused, proportionate and risk-based measures, including oversight or monitoring of NPOs. (this includes self-regulatory measures and related internal control measures in place within NPOs);⁶⁵
 - (iii) Effective information gathering and investigation; and

⁶¹ 24, BPP.

⁶² IO.10 core issue 10.3.

⁶³ IO10 Example b) 13.

⁶⁴ IO10 Example b) 11; 7, Interpretive Note to R8; and 43, Best Practices Paper.

⁶⁵ 6(c) Interpretive Note to R8.

- (iv) Effective capacity to respond to international requests for information about an NPO of concern.⁶⁶

General Standards for the Assessments

153 Measures should:

- Protect NPOs from terrorist financing;
- Be focused;
- Be proportionate;
- Be risk-based; and
- Not unduly inhibit legitimate NPO activity.⁶⁷

154 The requirement that measures ‘must not unduly disrupt or discourage legitimate NPO activity’ follows FATF’s stocktake of the unintended consequences of the incorrect implementation of its standards.⁶⁸ This recognised the negative impacts some CFT measures had had on legitimate NPO activity, both directly and indirectly, and requires jurisdictions to minimise the potential for such unintended consequences. FATF now explicitly requires countries to ensure measures comply with Recommendation 8 in a manner which respects obligations under the Charter of the United Nations and international law;⁶⁹ and to assess the impact of their policies and measures on NPOs’ access to financial services.⁷⁰

155 Additional considerations include:

- existing legal, regulatory, fiscal, administrative and policy measures by government (including outreach to the sector), and national CFT capacity more generally may sufficiently address the TF risk faced by NPOs;⁷¹
- existing governance, internal control, transparency and internal risk mitigating measures at the sector and organisational level within NPOs may already sufficiently address the TF risk to the NPOs in a country;⁷²
- there is no “one size fits all” strategy. Rather, a flexible, multi-faceted four-pronged approach is recommended comprising outreach; oversight and monitoring; information gathering and investigations; and capacity to respond to international requests;⁷³
- Activities and measures should be aligned with TF risk, including but not limited to:
 - (a) the overall level of TF risks;
 - (b) the characteristics of the domestic and cross-border TF activity (e.g. collection, movement and use of funds or other assets); and

⁶⁶ This wording is from Box 5 in the Best Practices Paper, and is an elaboration on the wording in IO.10 Example b) 12 and paragraph 7 of the Interpretive Note to R8.

⁶⁷ As stated in R8 and IO.10, paragraph 5 of the Interpretive Note, and in multiple places in the Best Practices Paper.

⁶⁸ <https://www.fatf-gafi.org/content/dam/fatf-gafi/reports/Unintended-Consequences.pdf.coredownload.inline.pdf>

⁶⁹ 4, Interpretive Note to R8.

⁷⁰ Box 9 and Paragraph 119 of the Best Practices Paper.

⁷¹ 42, BPP.

⁷² 42 and 57, BPP.

⁷³ 49, BPP.

(c) the country's prevailing TF methods, techniques and trends.⁷⁴

156 FATF standards and guidance set out some additional metrics for assessing specific mitigating measures. This includes specific measures for the two special cases reference above (NPOs under suspicion; and low-risk NPOs). These are elaborated in the relevant sections below as necessary.

Methodological Approach to Assessment of Mitigating Measures

157 In line with these requirements, the mitigating measures are assessed in four stages, as set out in the following sections:

1. Measures for all NPOs, including those at low risk of terrorist financing;
2. Oversight and monitoring of NPOs at risk of terrorist financing;
3. Oversight and monitoring of Charitable Trusts;
4. Measures to identify and investigate TF abuse of NPOs; and
5. Unintended consequences.

⁷⁴ IO.10 Notes to Assessors.

4.2 Measures for all NPOs, including those at Low Risk of Terrorist Financing

Sustained Outreach to the Sector concerning TF issues

- 158 FATF states that for low risk NPOs, the assessment need only consider the extent to which the country's level of outreach is consistent with the level of identified risk.⁷⁵ Oversight of low risk NPOs is only required to identify organisations which are higher risk, or to identify potential new risks within the sector. These issues are covered in section 4.3 (below). This section is focussed on outreach.
- 159 In Section 3, an estimated 98% of NPOs within Mauritius were identified as being low risk.
- 160 Criteria 8.2(b) and 8.2(c) of the FATF Methodology assessed outreach measures undertaken by government. In the *4th Enhanced Follow-Up Report*, criterion 8.2 was assessed as *Mostly Met*. The report recognised the various outreach and educational programmes, the development of brochures on protecting NPOs from TF abuse, and the consultation with NPOs on policies and best practices. However, it identified two deficiencies: the lack of any outreach to the donor community; and the lack of opportunity for NPOs to review or refine the booklets published by the authorities.
- 161 Regulators were asked to provide details on the outreach they have provided to NPOs from 2020-2025. The results are summarised in Table 10.

Table 10: Outreach sessions provided to NPOs in Mauritius

Authority	Number of Outreach Sessions	Number Targeted at High Risk NPOs	Attendees
Registrar of Associations	290	51	2245
Registrar of Companies / Foundations	45	45	2141 ¹
Board of Waqf Commissioners	106 ²	N/A	106
Financial Services Commission	10 ³	3 ⁴	908
TOTAL	450	99	5400

1 Figure includes representatives from private sector and other competent authorities.

2 All Mutawalli are invited to one-on-one sessions at registration, when obtaining a banking certificate, or when receiving a government grant. Waqf need to get a new banking certificate each year, meaning that Mutawalli of all waqf with bank accounts receive outreach annually.

3 Nine of the events were provided to qualified trustees, any of whom could attend. 1 joint event by the NPO Regulators was provided to donors.

4 These 4 events are highlighted as being focused specifically on areas of highest TF risk to NPOs. This includes the outreach focussed on donors.

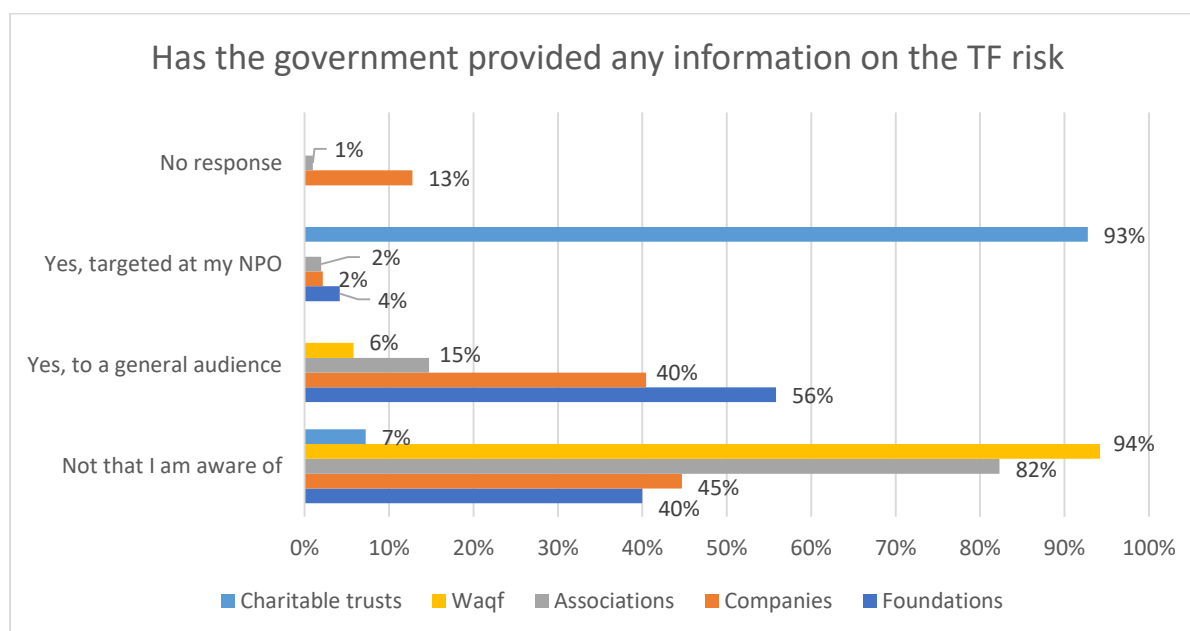
- 162 The NPO Survey conducted for this risk assessment asked a series of questions on government outreach measures. The survey asked NPOs to state if they had received any outreach from official sources on TF issues. There was a wide divergence in responses by legal type. Nearly all qualified trustees of Charitable Trusts reported that they had received targeted information, likely reflecting their status as supervised entities for AML/CFT purposes.
- 163 The figure for Associations requires further explanation. With over 9000 Associations registered, the Registrar has instituted a sustained outreach programme targeted at those Associations assessed as being more exposed to potential TF risk, in line with FATF's risk-based, targeted approach. This is

⁷⁵ IO10 Example b) 11.

reflected in the 17% of NPOs that report receiving information on TF, equivalent to 1,706 Associations. In addition, the ROA conducted three radio programmes on national radio. This has a wide audience reach, covering a large segment of the population and Associations.

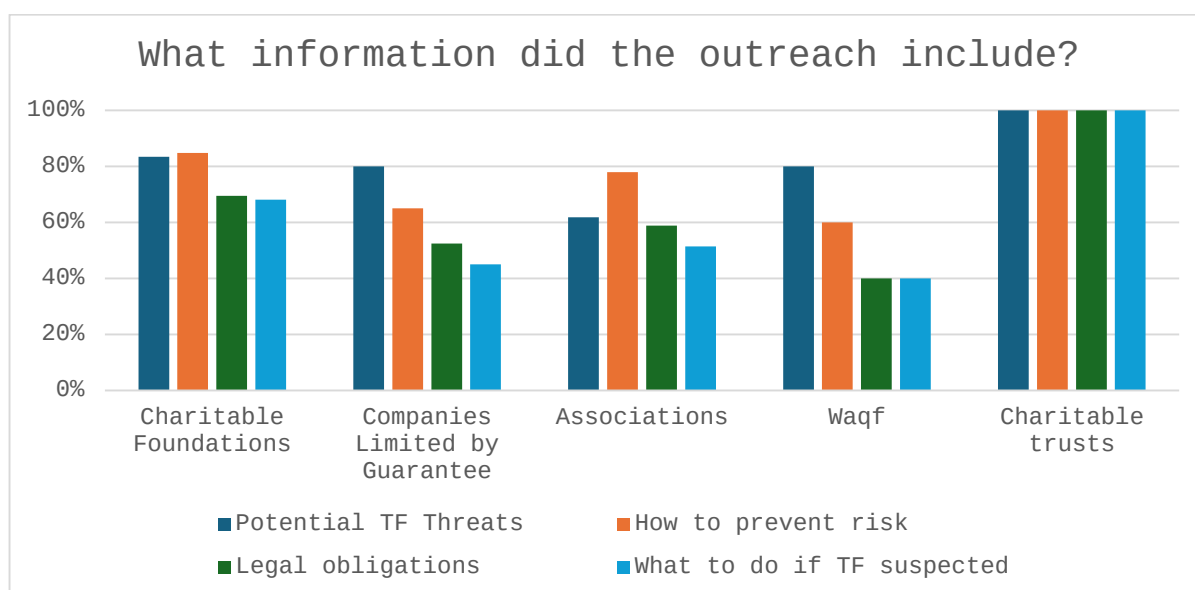
- 164 Very few Waqfs were aware of any outreach on TF risk. Officials stated that this reflects the policy decision to not explicitly reference either ‘terrorist financing’ or ‘money laundering’ in outreach sessions but instead refer to ‘illegal activities’. Further, the BOWC is made up of representatives from Waqf, and officials asserted that respondents would not interpret this outreach as coming from ‘government’ in the context of this survey question.

Figure 17: Proportion of NPOs receiving outreach on TF risk (Source: NPO surveys)



- 165 Authorities provided details on the topics covered in their outreach. Typically, this include information on TF threats and risks; how they can be identified and prevented through best practices; information on relevant legal obligations; and what to do if an NPO official suspects terrorist financing abuse. This often forms one component of broader outreach on a range of issues regarding NPOs legal obligations and best practices.
- 166 Four documents are foundational to the outreach. These are (1) the NPO TF Risk Assessment (2020); (2) the NPO Brochure ‘*Being Resilient*’ on mitigating TF risk; (3) the FATF Typologies Report (2014); and the FATF Best Practices Paper (2023). All are available on the websites of NPO Regulators.
- 167 Those NPOs that reported receiving outreach in the NPO survey were asked to detail the topics covered. The results are shown in Figure 18. 266 of 267 (99.6%) of respondents reported that the outreach received was relevant and useful.

Figure 18: Relevance and usefulness of topics covered in outreach (Source: NPO surveys)



168 Outreach measures are assessed as effective in meeting the requirements of R8. To maintain this rating, the following steps should be taken:

1. Update all outreach to reflect the findings from this risk assessment and the reforms to the Best Practices Paper on Recommendation 8.
2. Consult with representatives from the NPO sector when reviewing and updating guidance.
3. Continue the programme of sustained outreach, including the targeting of NPOs at more risk of TF abuse.

Self-Regulatory Measures and Internal Controls

169 FATF states that self-regulatory measures and related internal control measures in place within NPOs, or other measures may already sufficiently address the current terrorist financing risk to the NPOs in a country.⁷⁶

170 Self-regulatory measures may include voluntary sector standards, sector codes with independent verification, donor enforced self-regulation, market-based instruments, or co-regulation with government.⁷⁷

171 Recommendation 8 does not require NPOs to undertake measures to understand and mitigate TF risks,⁷⁸ and appropriate internal control measures will vary depending on the risk. These measures could include taking steps to understand the TF risk an individual organisation faces; and having appropriate internal controls measures. Internal control measures comprise organisational integrity (governance); partner and donor relations; financial accountability and transparency; and programme planning and monitoring.

⁷⁶ 6(c), Interpretive Note to R8.

⁷⁷ 96, Best Practices Paper.

⁷⁸ 80, Best Practices Paper.

- 172 There is evidence to suggest that NPOs are contributing to the mitigation of risks through robust internal controls. Outreach and inspection measures for Associations, Companies Limited by Guarantee, Charitable Foundations, Waqfs and Charitable Trusts focus on, amongst other things, legal duties and best practices in relation to internal controls (see previous section and next section for more details). These measures are comprehensive (in the case of Companies Limited by Guarantee, Charitable Foundations and Waqfs (through Mutawalli); or targeted at higher-risk entities, in the case of Associations and Charitable Trusts (through QTs). This provide assurance that the quality of NPOs' internal controls is being assessed and improved in a systemic and targeted way.
- 173 A survey of qualified trustees of Charitable Trusts revealed a range of measures undertaken by those NPOs (see Table 11).

Table 11: Measures undertaken by Charitable Trusts to reduce its TF risk (Source: FSC survey).

Reported measure	Proportion
Apply best practice governance measures or procedures	84%
Apply best practice financial management systems or procedures	84%
Due diligence of partners (including contractors and sub-grantees)	81%
Train staff on risk (e.g. awareness of, identifying, mitigating and preventing risk)	80%
Due diligence of donors	75%
Due diligence of beneficiaries	75%
Formal risk assessments	74%
Apply best practice project management systems or procedures	65%
Subscribe to or follow third-party standards (e.g. voluntary codes of conduct; ISOs)	27%

- 174 There is evidence to suggest that NPO's internal control measures are contributing to the mitigation of the risk. No significant self-regulatory mechanisms have been identified.

4.3 Oversight and Monitoring of NPOs at Risk of Terrorist Financing

175 This section analyses measures which apply to NPOs that are potentially exposed to TF risks. According to the conclusion reached in section 3.5 (above), this comprises:

- NPOs that raise funds in Mauritius for humanitarian causes in high-risk jurisdictions.
- NPOs with links to high-risk jurisdictions.
- The possible use of online crowdfunding or virtual assets to raise or move funds.

176 This section only applies to Associations, Companies Limited by Guarantee, Charitable Foundations and Waqf that fall within these categories. Charitable Trusts are dealt with separately in section 4.4.

Focused, proportionate and risk-based measures, including oversight or monitoring of NPOs;

177 FATF identifies four specific elements of monitoring and oversight:

- Oversight.
- Monitoring.
- Sanctions.
- Self-regulatory mechanisms and internal controls (see section 4.2, above).

178 Measures must be focussed, proportionate, risk-based, and must not inhibit legitimate NPO activity. Existing regulatory or other measures may already sufficiently address the current TF risk to the NPOs in a jurisdiction.⁷⁹

Oversight

179 Oversight mechanisms are less intensive and intrusive measures to identify NPOs which require more intervention. The oversight measures are assessed insofar as they enable the identification of NPOs that may be at risk of TF. It may include verification of registration data, periodic returns, updates or risk assessments, and monitoring of the risk environment.⁸⁰

180 There are three critical components to an effective oversight system. These are:

1. It understands what the risks are.
2. It obtains information on all potentially risky NPOs.
3. It is able to identify the individual NPOs that may be exposed to the identified risk factors.

Understanding what the risks are.

181 The primary formal mechanism for identifying the potential TF risks is the NPO TF Risk Assessment process. This document is the second risk assessment, and has closely engaged all of the relevant authorities. There is clear evidence that the conclusions of the 2020 NPO TF Risk Assessment have been absorbed, and every reason to believe the same will happen with the conclusions from this assessment.

182 The Terrorist Financing Investigation Committee (TFIC) has a specific responsibility to identify NPOs vulnerable to TF abuse. The TFIC is chaired by the head of Central Criminal Investigating Department (CCID) and brings together key national agencies such as the FIU, AGO, Office of the Director of Public Prosecutions (ODPP), MRA and Interpol, among others.

⁷⁹ 8.3b, Methodology.

⁸⁰ 60, 63 Best Practices Paper.

- 183 The TFIC may, as and when it considers necessary, co-opt any new agency where it considers that the agency's functions may be relevant to TFIC's mandate. Members from the following agencies may be invited to support the TFIC's work: the National Security Service (NSS), the BOM, the FSC and the ROA.
- 184 The MFSEP has set up a Risk Monitoring Committee whose main mandate is to keep ML and TF risks understanding up to date in between full-fledged risk assessments. Accordingly, any information in relation to TF and NPOs will be shared with NPO regulators. Informally, there is evidence of processes in place to share insights and intelligence between these agencies. Interviews with officials for this risk assessment confirmed good links between various competent authorities, and a strong awareness of broader risk trends. There was also some evidence of more formalised processes.
- 185 Consequently, the measures here are assessed as effective.

Obtaining information on all potentially risky NPOs

- 186 The primary mechanism for obtaining information on Associations, Companies Limited by Guarantee, Charitable Foundations and Waqf is the compulsory registration and reporting regime. All NPOs in these four categories are required to register with the relevant authority. The available evidence suggests that there is full compliance with the requirement to register. Details of registration are provided in Table 12.

Table 12: Registration requirements applicable to Associations, Companies Limited by Guarantee, Charitable Foundations and Waqfs (Source: authorities listed).

	Association	Companies Limited by Guarantee	Charitable Foundation	Waqfs
Competent authority	Registrar of Associations	Registrar of Companies	Registrar of Foundations	Board of Waqf Commissioners
NPOs within remit	Associations registered under the Registration of Associations Act 1978	Companies limited by guarantee under the Companies Act 2001	Charitable foundations under the Foundations Act 2012	Waqf established under the Waqf Act 1941
Number of registered NPOs	9396	198	199	331
Information obtained at registration				
	Association	Companies Limited by Guarantee	Charitable Foundation	Waqfs
Name	Yes	Yes	Yes	Yes
Date of formation	Yes	Yes	Yes	Yes
Purpose and objectives	Yes	Yes	Yes	Yes
Governing document	Yes	Yes	Yes	Yes
Details of beneficiary	Not Applicable	Not Applicable	Yes	Yes
List of officers (inc. founders, directors, or beneficial owners)	Yes	Yes	Yes	Yes
Address of officers	Yes	Yes	Yes	Yes

Verification of officers' I.D.	Yes	Yes	Yes	Yes
List of members	Yes	Yes	N/A	N/A
Registered office	Yes	Yes	Yes	

187 The registration systems are comprehensive and effective, and obtain the necessary information on Associations, Companies Limited by Guarantee, Charitable Foundations and Waqfs.

Identifying individual NPOs that may be exposed to the identified risk factors

188 All four legal types are subject to record keeping requirements. Associations, Companies Limited by Guarantee and Waqfs are subject to statutory reporting requirements with the relevant authority. In respect of Charitable Foundations, the ROF may request for any additional information as and when required under AML/CFT obligations. Associations, Companies Limited by Guarantee and Charitable Foundations are further subject to TF-targeted questionnaires. Details on these processes are provided in Table 13. Compliance rates vary, and are also set out in Table 13.

Table 13: Record keeping and reporting requirements applicable to Associations, Companies Limited by Guarantee, Charitable Foundations and Waqf (Source: authorities listed).

	Associations	Companies Limited by Guarantee	Charitable Foundations	Waqfs
Record keeping requirements				
Keep accounts and financial records	Yes	Yes	Yes	Yes
Reporting requirements				
	Association	Companies Limited by Guarantee	Charitable Foundation	Waqfs
Statement of receipts and Payments/ Income and expenditure	Annual	Annual	None	Annual
Statement of Assets and Liabilities/ Balance sheet	Annual	Annual	None	Annual
Change in officials	When change made	When change made	When change made	When change made
Other reporting requirements	Risk-based questionnaire (targeted NPOs)	Risk-based questionnaire (proportion of NPOs each year)		
Simplified form				If income less than Rs10,000

Compliance rate with reporting requirements (annual returns/accounts)				
	Associations	Companies Limited by Guarantee	Charitable Foundations	Waqfs
	67%	98%	N/A	71%

- 189 For associations, the systems and powers are in place to obtain necessary information, and to adjust to updates in the understanding of risk. This includes established and effective processes to assess exposure to risk factors both at registration and through annual returns.
- 190 As there is a large number of Associations, a risk-based and targeted approach is essential. The current migration to a fully computerised system is noted and welcomed, as it will allow sifting of annual returns to identify potential indicators of risk factors to be flagged for human review.
- 191 The Registrar can require foundations to provide financial statements upon request,⁸¹ there is otherwise a lack of a statutory reporting requirements for foundations. This is not an issue so long as the data to identify the presence of potential risk indicators is obtained through some other means, such as the questionnaires that are in place.
- 192 The oversight system for Waqfs is more informal than for Associations, Companies Limited by Guarantee or Charitable Foundations. The regulation of Waqf is a quasi-self-regulatory system, with the BOWC comprising Mutawalli. Like many self-regulatory systems, it relies on strong relationships and trust as much as formalised systems. These informal mechanisms can be highly effective, and care should be taken not to disrupt them unnecessarily.
- 193 It is also noted that there is less data to suggest that the identified TF risk factors are relevant to Waqfs. Specifically, Waqfs are domestic in nature, with no Waqf reporting any overseas activities. Secondly, many Waqfs do not raise funds, relying on income from their initial endowment. Only some mosque Waqfs are permitted to raise funds from the community for specific projects, which must be approved in advance by the BOWC. The Waqfs would be required to submit quarterly reports on progress of the project to the Board and undertake due diligence of donors. The charitable Waqfs and family Waqfs cannot do fundraising.
- 194 There is no evidence that Waqfs have engaged in online crowdfunding or used virtual assets as vehicles for fund-raising. There is no fundamental reason why this may not happen, but the BOWC would be notified in advance and would have to approve the activity as part of the approval process. Waqfs have collected funds through online payment services such as MCB Juice or through internet banking.

Monitoring

- 195 Monitoring covers a range of measures to ensure NPOs are complying with the legal and regulatory framework.⁸² These are more intensive and proactive exercises. It is a targeted and risk-based activity, focussed only on those NPOs exposed to TF risk,⁸³ which are identified by the oversight process (see section above). Some monitoring measures are specific to certain legal types; other measures apply all legal entities including NPOs.

Monitoring Measures for Specific Types of NPOs

- 196 For Associations, entities subject to monitoring are identified by the assessments undertaken at registration, through annual returns, surveys or because of a complaint. These NPOs are subject to inspections, where recommendations are made for improvements or any deficiencies noted. They are then re-assessed to ensure that these vulnerabilities have been addressed.

⁸¹ s.36A(3), Amended Act no. 15 of 2021, Government Gazette No. 121 of 5 August 2021.

⁸² 59 Best Practices Paper.

⁸³ 61, Best Practices Paper.

197 In practice, the system seems to be effective. The highest risk NPOs are prioritised for inspections. The inspections themselves cover relevant issues, including review of financial information, cross border movement of funds, details of donors and beneficiaries, purpose and channel used for transfer of funds and a review of compliance with statutory and internal laws.

198 These powers are set out in the Foundations Act 2012 and Companies Act 2001 respectively. They set out that Charitable Foundations and Companies Limited by Guarantee “shall implement programmes against terrorism financing, which are commensurate with the terrorism financing risks to which it is exposed and the size and nature of its business.”⁸⁴ The laws then set out the specific powers of the Registrar to ensure compliance with the TF provisions in the Act, including the power to conduct a risk-based inspection, issue guidelines, give directives, or require a Companies Limited by Guarantee or Charitable Foundation to submit a report on corrective measures.

199 No concerns were raised about the powers or capacity of the ROC/ROF to undertake monitoring of Companies Limited by Guarantee and Charitable Foundations, the mechanism appears to be effective.

Monitoring Measures for All Legal Entities

200 Certain monitoring processes apply to all legal entities, of which NPO comprise a small part. This occurs

201 Any transaction by a legal entity with a high-risk jurisdiction, entity or individual is liable to be reported by a reporting person through a STR. The overall number of STRs involving NPOs is comparatively small (see section 3.3 above). Data from other sources, in particular the survey, support the conclusion that this is because NPOs engage in little activity which would trigger an STR. This conclusion is supported by a review of STRs undertaken by the FIU, which found a significant increase in the number of STRs between 2020 and 2024, but noted no equivalent increase in the number relating to NPOs.

202 Section 3.3 provides an example of a Competent Authority using its supervisory powers to sanction a financial institution which had failed in its scrutiny of activity in a high-risk jurisdiction by a NPO client. Although the case did not involve any criminal activity, it demonstrates that the supervision process works in relation to NPOs. Mauritius was found Compliant with Recommendation 20.

203 The MRA has monitoring powers in relation to entities which obtain charitable institution status. Charitable institutions are exempt from income tax under the Income Tax Act 1995, however they are required to submit a statement on donations received, including information on the donors. The MRA is also empowered to undertake risk-based audits. This is focused on compliance with the revenue laws, but the MRA has Memoranda of Understanding in place with the FSC, FIU and FCC which facilitates the sharing of information if TF or ML is suspected. It can also coordinate with the ROA, ROC/ROF and FSC during its investigations.

204 At the level of the MPF, there is an established procedure in place for public cash fund-raising. Applicants are requested to call in at the Police Headquarter to fill in a form (Police form no. 54) and provide all necessary documentation to prove the authenticity, necessity and urgency of the public collection⁸⁵. The submitted documents and background of the applicant will be subject to internal

⁸⁴ For Companies Limited by Guarantee, the relevant statutes are the Companies Act 2001 as amended by the Anti-Money Laundering and Combatting the Financing of Terrorism and Proliferation (Miscellaneous Provisions) Act 2024 (s.269(A)). For foundations, the relevant statute is the Foundations Act 2012 Ss.(30(3)-(6)).

⁸⁵ The requirement for application of public cash fund-raising is as follows:

(a) Recommendation from Ministry of Health & Quality of Life required for Persons requiring medical treatment/ surgical operation abroad when treatment is not available in Mauritius;

(b) Memo from Fire & Rescue Services to be enclosed for Persons, victim in a case of fire;

(c) Building Permit to be enclosed for Registered charitable Institutions/ Religious Society for religious ceremony or construction/ renovation of religious building;

scrutiny by an Enquiry Officer and Station Manager. Upon meeting all the assessment criteria and completion of the enquiry, the application will be approved by the Commissioner of Police. Consequently, an approved letter will be signed and sent by the Commissioner of Police to the applicant which is valid for a period of three months.

- 205 In relation to online crowdfunding, new control mechanisms were introduced through an amendment to the Public Collection Act 1965 under Section 53 of the (Miscellaneous Provisions) Act 2020 (Act 7 of 2020). However, it is yet to be proclaimed. As the new mechanisms have not been implemented, these measures are assessed as deficient.
- 206 In relation to the use of virtual assets, the VAITOS Act establishes a licensing and supervision regime for all VASPs. Mauritius was re-rated as Largely Compliant with Recommendation 15 in the 5th enhanced Follow-Up Report (2022), with only minor deficiencies noted. These measures are assessed as adequate.

Sanctions

- 207 Effective, proportionate and dissuasive sanctions for violations by NPOs or persons acting on behalf of these NPOs are required. This may include powers to freeze accounts, remove trustees, issue fines, de-certification, delicensing and de-registration. This should not preclude parallel civil, administrative or criminal proceedings with respect to NPOs or persons acting on their behalf where appropriate.
- 208 The 4th Follow-Up Report found appropriate sanctions in place for Associations and Trusts, which comprise 95% of the sector. However, it observed that measures for Charitable Foundations and Companies Limited by Guarantee were limited to criminal sanctions and rated this as a shortcoming. Amendments to the Companies Act and Foundations Act in 2024⁸⁶ addressed these deficiencies, introducing new powers for the ROC and ROF to apply administrative sanctions to both Foundations and Companies limited by Guarantee, including powers to:
- (i) issue a private warning;
 - (ii) impose such administrative penalty as may be prescribed;
 - (iii) issue a cease-and-desist order that requires NPO, its officer or its member to cease and desist from the actions and violations specified in the order, and require affirmative action to correct the conditions resulting from any such actions or violations;
 - (iv) ban a person from being a member of an NPO for a period not exceeding 5 years; and
 - (v) remove an NPO from its register.
- 209 Waqfs were not considered in the 4th FUR. However, a review of the powers of the Waqf Board reveal an appropriate range of sanctions. They may remove a Mutawalli if they are unfit to perform their function; may remove, appoint or vest property in a Mutawalli (with a court order); or direct accounts and inquiries (with a court order). The court may also direct the Mutawalli to take an action consistent with his responsibilities; or take such action should a Mutawalli be sued for breach of trust by some other interested person. The Board may fine a Mutawalli that fails to submit financial information.
- 210 In relation to 'charitable institutions', the Income Tax Act 1995 (as amended by Finance Act 2025) empowers the MRA to revoke the status of charitable institutions where the institution no longer meets charitable objects, or approval was obtained by fraud or misrepresentation. This would include instances where NPOs were engaged in TF.

(d) Authorisation from Ministry of Education/ PSSSA to be attached for Parents/ Teachers Association of Educational Institutions for educational purposes.

⁸⁶ Amendments to s.30(6)(e) of the Foundation Act 2012 and s.269(A)(4)(e) of the Companies Act 2001 were made by the Anti-Money Laundering and Combatting the Financing of Terrorism and Proliferation (Miscellaneous Provisions) Act 2024.

4.4 Oversight and Monitoring of Charitable Trusts

- 211 This section analyses oversight and monitoring measures which apply to Charitable Trusts. Charitable Trusts as a legal category were identified as being a medium risk in section 3.5 (above). The assessment of the oversight and monitoring measures should therefore apply to all Charitable Trusts, and not just to those with the high-risk factors identified in section 3.5.
- 212 Please note, the outreach and investigation measures that apply to Charitable Trusts are included as part of the analysis of those measures for all NPOs in sections 4.2 (above) and 4.5 (below).
- 213 As noted in section 4.3, an effective oversight system should consist of three critical components. These are:
1. It understands what the risks are.
 2. It obtains information on all potentially risky NPOs.
 3. It is able to identify the individual NPOs that may be exposed to the identified risk factors.
- 214 Please refer to section 4.3 for analysis of ‘understanding the risks’, which applies equally to Charitable Trusts.
- 215 All Charitable Trusts are managed by a QT, which are management companies or such other person resident in Mauritius as may be authorised by the FSC to provide trusteeship services.⁸⁷ QT is subject to a ‘fit and proper person’⁸⁸ test and are reporting entities under AML/CFT Law. The FSC keeps a register of its licensees which includes QTs and the latter is required to keep up-to-date and accurate accounts and records of his trusteeship and details on the names and addresses of each beneficiary⁸⁹ and settlor.⁹⁰ QT are required to maintain a register of all trusts under its administration and trusteeship, and record such information as the FSC shall determine, and provide it to the FSC at their request.⁹¹
- 216 As part of its AML/CFT Risk-Based Supervision, the FSC circulates an offsite monitoring questionnaire (OMQ) on AML/CFT risks to all licensees, which includes QTs of charitable trusts. Data collected in the OMQ includes the number of domestic and foreign charitable trusts currently under the management of the QT. The data is used to generate a risk rating for each entity, which provides the basis for supervisory interventions which can include offsite and onsite monitoring and inspections.
- 217 Onsite inspections are conducted to monitor compliance with and assess the effectiveness of the measures implemented by the QTs to control TF risks. The inspections will look at a sample of clients of the QTs, including any charitable trusts.
- 218 The FSC’s supervisory powers over QTs includes a power under s.42 of the FSA to obtain from licensees any information, records or documents it may require.⁹²
- 219 Notwithstanding the close supervision of QTs noted above, the FSC does not have a specific register of Charitable Trusts; does not hold direct information on what Charitable Trusts exist or on their purposes, activities or finances; and does not have direct information on risk factors within Charitable Trusts. It is therefore not able to systemically identify the individual Charitable Trusts that may be exposed to TF risk factors.

⁸⁷ S.2 of the Trust Act.

⁸⁸ S.18(e) of the FSA.

⁸⁹ ‘Beneficiary’ here in the sense of ‘beneficial owner’, as opposed to a beneficiary of charitable assistance.

⁹⁰ S.38 (3)(a) of the Trust Act.

⁹¹ S.29(5) of the FSA.

⁹² S.42(1) of the FSA: “Every licensee shall furnish to the Commission all such information and produce such records or documents at such time and place as may be required of him in writing by the Chief Executive.”

- 220 The information on Charitable Trusts obtained for this report came from a survey of QTs. Not all QTs responded to the survey, with a total of 55 non-respondents. Whilst it seems likely that these did not respond because they manage no Charitable Trusts, this cannot be assumed. Any data obtained on Charitable Trusts from the survey must be understood in this context.
- 221 Discussions were also held with officials and QTs about their function and the legal form given the low numbers of Charitable Trusts and confidentiality being perceived as opacity of their administration. Trusts including Charitable Trusts are private arrangements and there is no central registry for trusts. Considering the confidentiality associated with Charitable Trusts, this legal form is perceived as opaque. Even though, information on Charitable Trusts is not kept at the level of the Supervisor of QTs which is the FSC, it is readily available at the level of QTs. The supervisor is empowered under s.42 of the FSA to request for information from the QT and all such information shall be provided at such time and place determined by the supervisor. Based on discussions held, it was observed that most Charitable Trusts were established by QTs as an additional service for an existing client for whom QTs were already providing a range of services. In addition, there is no evidence to suggest that the founders of Charitable Trusts are attracted to this legal form because of their perceived opacity. The risk-rating of 'medium' assigned to Charitable Trusts is entirely based upon perceived vulnerability arising from the fact that information is confidential and is not kept at the level of the Supervisor rather at the level of QTs.
- 222 It is reiterated that there is no evidence to suggest that Charitable Trusts have ever been abused for TF purposes. Further, the Risk Assessment Working Group (which includes representatives of QTs, as well as the FSC, law enforcement and other supervisors) noted that there are no known links of Charitable Trusts with crowdfunding platforms, websites, online money transfer services or virtual assets. The Working Group members are aware of no evidence of suspicions or illegal funding or donations; no evidence of transfer of funds to personal or unknown accounts, to companies not connected to charitable activities, or unjustified cash transactions; no lack of or falsification of documentation; no lack of clarity in designations or similar examples or opacity in record keeping; no evidence that QTs are unaware of transactions; and no evidence of the use of multiple bank accounts.
- 223 A case of transfer of funds to high-risk jurisdiction was noted during the discussion. However, the movement of funds was in line with the purposes of the Charitable Trusts; it related to the funding of an activity rather than individuals; and the use and amount of funds was consistent with the purposes for which it was established and the profile of the Charitable Trust.
- 224 Some general best practices by QTs in relation to Charitable Trusts were noted. They have a stringent manual that prevails and have an application form for trusts which require the settlor to declare source of funds. Onboarding processes are vigilant, while verifications checks are conducted. There are internal controls in place at the level of the QT and there is flexibility in monitoring funding of activities through independent sources. However, it was noted that whilst most QTs have policies on the use of cash, some do not.

4.5 Measures to Identify and Investigate TF Abuse of NPOs

225 FATF states that for NPOs suspected of being exploited by, or actively supporting terrorist activity or terrorist organisations, additional consideration should be given to:

- the extent to which appropriate investigative, criminal, civil or administrative actions, cooperation and co-ordination mechanisms apply to these NPOs;
- whether the appropriate authorities have adequate resources to perform their outreach/ oversight/ monitoring/ investigation duties effectively.⁹³

226 There is no specific investigative facility for NPOs. NPOs under investigation would be investigated on the same basis as any other legal entity. The effectiveness of investigative measures at a jurisdictional level are assessed in detail in Recommendation 2 (National cooperation and coordination), Recommendation 30 (Responsibilities of law enforcement and investigative authorities), Recommendation 31 (Powers of law enforcement and investigative authorities), Recommendation 37 (Mutual Legal Assistance) and Recommendation 40 (International Cooperation); and in Immediate Outcome 9, which assesses the effectiveness of terrorist financing (TF) investigations and prosecutions. The application of these measures for NPOs are assessed in Criteria 8.5 (effective information gathering and investigation) and 8.6 (international cooperation).

227 The current ratings of these standards are as follows:

- R.2, R.30 and R.31: Compliant.
- R.37 and R.40: Largely Compliant. Operational challenges, including delays in responsiveness, differences in foreign procedures, and limited real-time intelligence, particularly in complex cases, were cited as shortcomings.
- IO9: Low Effectiveness: Progress was shown through the establishment of the TFIC, but effectiveness in relation to IO9 has not yet been assessed since the 2018 MER of Mauritius.
- Criterion 8.5: Mostly Met: The lack of an information sharing agreement between the ROA and the MRA is a minor shortcoming.
- Criterion 8.6: Partly Met: The absence of specific procedures to facilitate responses to international requests for information; and the absence of contact points for Companies Limited by Guarantee and Charitable Foundations were cited as shortcomings.

228 These ratings reflect a solid legal and institutional framework for investigations, information gathering and international cooperation in AML/CFT matters.

229 Since the evaluation, Mauritius has strengthened its coordination framework through the TFIC, established in July 2019. The TFIC is chaired by the head of CCID and brings together key national agencies such as the FIU, FCC, AGO, ODPP, MRA and Interpol, among others. The TFIC may, as and when it considers necessary, also co-opt any new agency where it considers that the agency's functions may be relevant to the TFIC's mandate. The TFIC's functions include monitoring and coordinating all TF cases, facilitating information exchange, eliminating duplication, allocating tasks and ensuring the allocation of sufficient resources. Significantly, its mandate also includes a specific responsibility to identify NPOs vulnerable to TF abuse.

230 Since the evaluation, the ROC and ROF have established points of contact.

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⁹³ IO10 Example b) 13.

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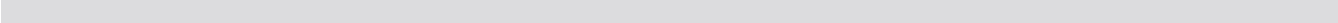
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232 The findings and recommendations from this risk assessment should be disseminated to all relevant agencies.

4.6 Unintended Consequences

- 233 FATF Recommendation 8 requires that measures ‘must not unduly disrupt or discourage legitimate NPO activity.’ This reflects the findings of FATF’s stocktake of the unintended consequences of the incorrect implementation of its standards.⁹⁴ This recognised the negative impacts some CFT measures had had on legitimate NPO activity, both directly and indirectly, and requires jurisdictions to minimise the potential for such unintended consequences.
- 234 Countries should comply with R8 in a manner which respects obligations under the Charter of the United Nations and international law.⁹⁵ They include obligations to comply with:
- international human rights law, international refugee law and international humanitarian law.⁹⁶ This includes obligations to minimise the negative impact of interventions on innocent and legitimate beneficiaries of NPO activity to the extent reasonably possible, particularly where there is a humanitarian need;⁹⁷
 - fundamental human rights, including freedoms of opinion, expression, religion or belief, of peaceful assembly and of association⁹⁸ (which includes the freedom for associations to operate without registration).⁹⁹
- 235 Specific measures mentioned by FATF which are not compliant with R8 include:
- applying measures to NPOs which are not within the FATF definition;¹⁰⁰ treating all NPOs as high risk for AML/CFT purposes, regardless of actual level of risk; or intrusive supervision of NPOs for AML/CFT purposes without any consideration of risks;¹⁰¹
 - forced dissolution, deregistration or expulsion of NPOs in the name of FATF compliance;¹⁰²
 - designating NPOs as reporting or obliged entities for AML/CFT purposes, or applying related measures to them (such as obligations for entity level risk assessments; AML/CFT preventative measures; identification of suspicious transactions and reporting obligations; identification and information requirements on beneficiaries; identification and information requirements on all foreign agents and donors or NGOs’ local partners; low monetary amount thresholds for reporting individual donations; record keeping requirements; or requiring NPOs to identify beneficiaries in humanitarian aid, development, or peacebuilding settings.)¹⁰³

CFT-Related Restrictions on Non-FATF NPOs or Protected Freedoms

- 236 No NPOs are reporting persons under the FIAMLA. Whilst QTs of Charitable Trusts are reporting persons, this does not constitute a restriction on the NPO.

⁹⁴ <https://www.fatf-gafi.org/content/dam/fatf-gafi/reports/Unintended-Consequences.pdf.coredownload.inline.pdf>

⁹⁵ 4, Interpretive Note to R8.

⁹⁶ 6, Best Practices Paper.

⁹⁷ 5d and 5e, Interpretive Note to R8. See also United Nations Security Council (UNSC) resolution 2462(2019) paras 6 and 23 and UNSC resolution 2664(2022) para.1, which introduce a humanitarian exemption for asset freeze provisions of UN sanctions regimes.

⁹⁸ 47, Best Practices Paper.

⁹⁹ Footnote 32, Box 3 of Best Practice Paper. See (UN A/HRC/29/25).

¹⁰⁰ 5e, Interpretive Note to R8

¹⁰¹ 6, Best Practices Paper.

¹⁰² 6, Best Practices Paper.

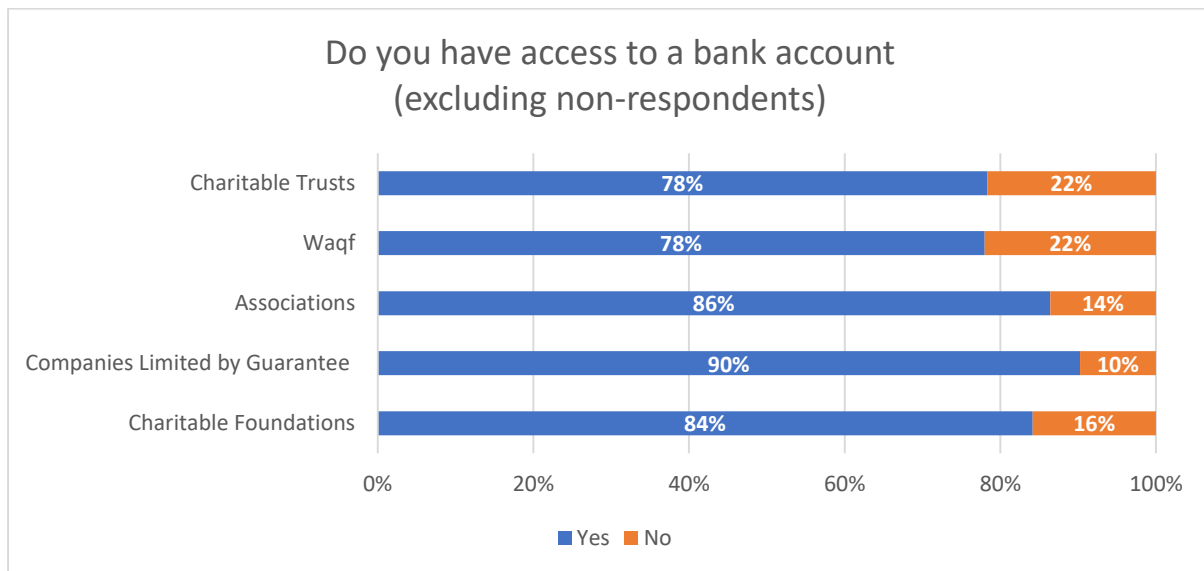
¹⁰³ Box 4, Best Practices Paper.

237 No other specific AML/CFT restrictions or requirements applying to any NPO in Mauritius have been identified. Similarly, no independent analysis has been identified that concludes that AML/CFT policy or legislative measures are unduly inhibiting legitimate NPO activities.

Access to financial services

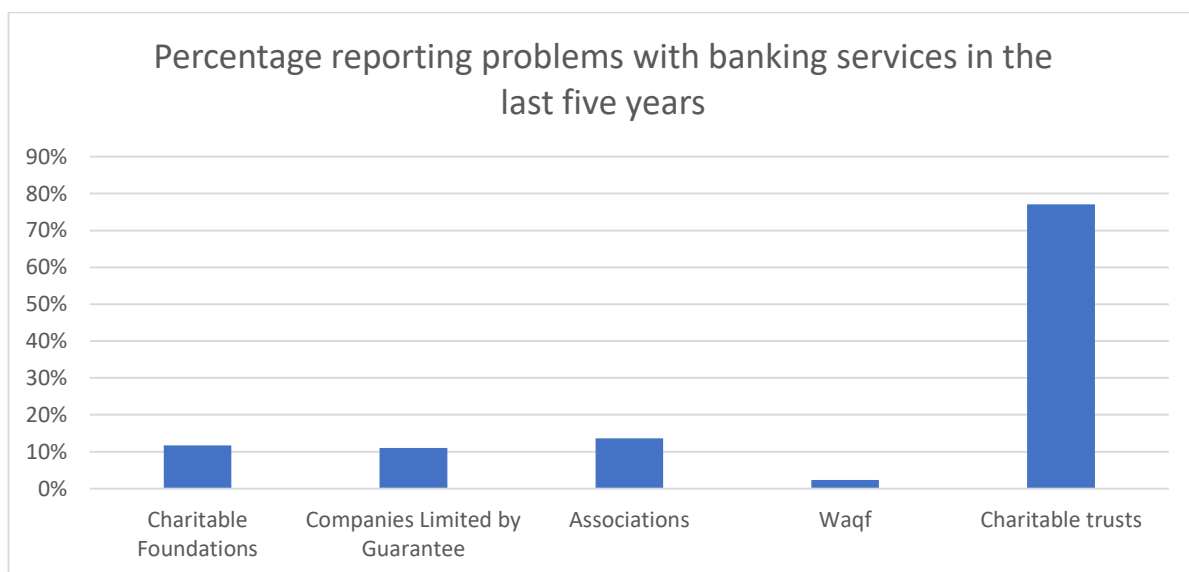
238 Section 2 of the NPO survey contained questions to assess potential unintended consequences on NPOs' access to financial services. The results are shown in Figure 19. Weighted to the relative sizes of the legal types, this corresponds to a total of 86% of NPOs with access to a bank account.

Figure 19: Access to bank account (Source: NPO surveys)



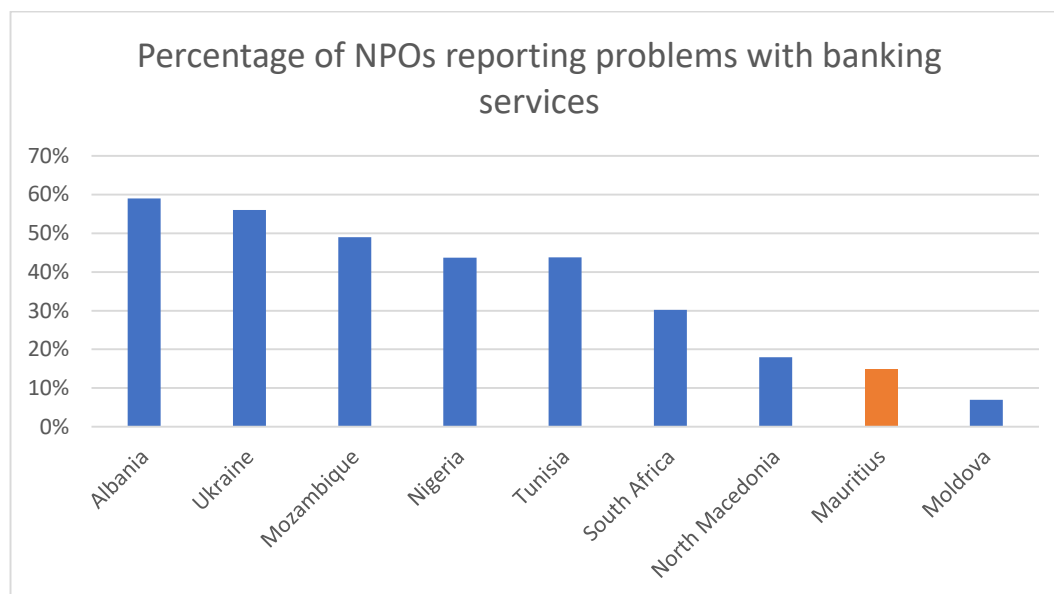
239 A weighted total of 85% of NPOs report no problems with access to financial services. There are two outliers. Only 2% of Waqfs reported problems. However, 77% of Charitable Trusts reported problems.

Figure 20: Access to bank account (Source: NPO surveys)



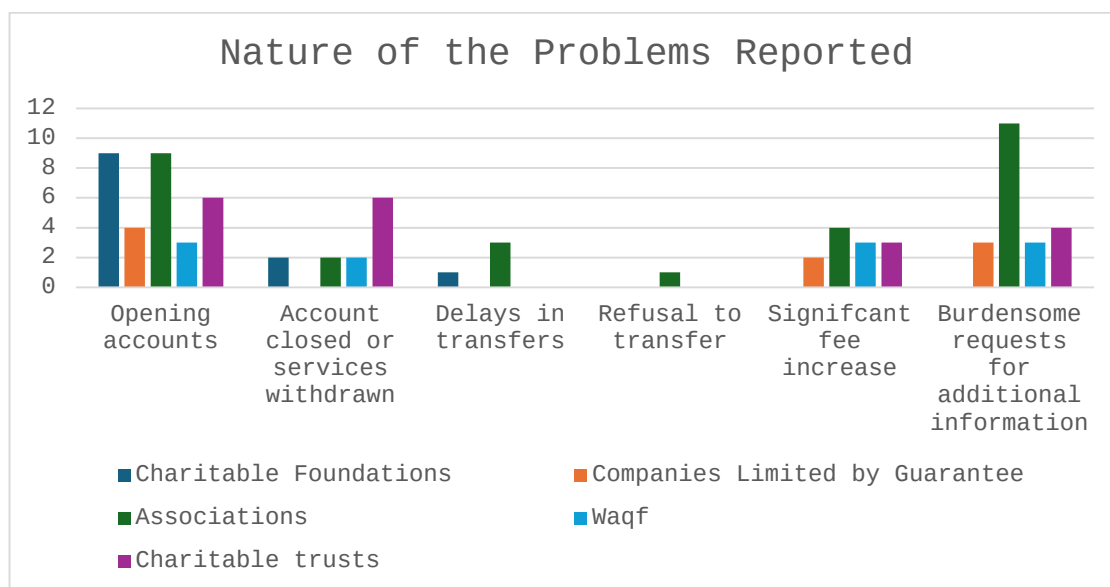
240 Similar surveys have been conducted in eight other jurisdictions that have published their results.¹⁰⁴ Comparing the results from Mauritius with these other jurisdictions suggests that financial access issues for NPOs in Mauritius are comparatively minor.

Figure 21: Comparative analysis of financial access problems for NPOs (Source: NPO surveys)



241 Respondents that had experienced problems with banking services in the last five years were asked to state the nature of the problems. Relatively few responses were received, with the most numerous concerns relating to the opening of accounts and burdensome requests for information. 12 respondents reported that they had had an account closed.

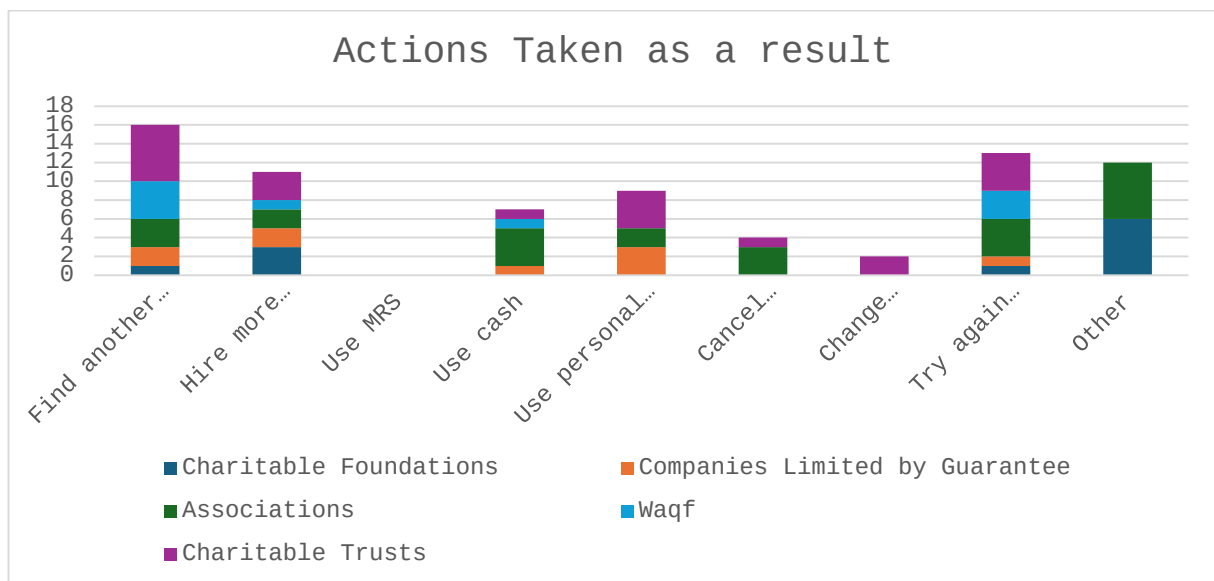
Figure 22: Nature of problems with banking services (Source: NPO surveys)



¹⁰⁴ Survey results from Albania, Ukraine, Nigeria, South Africa and North Macedonia are publicly available through the NPO TF Risk Assessments. The surveys were based on randomised samples of NPOs contacted by telephone, except Nigeria, where surveys were not randomised and interviews were held in person.

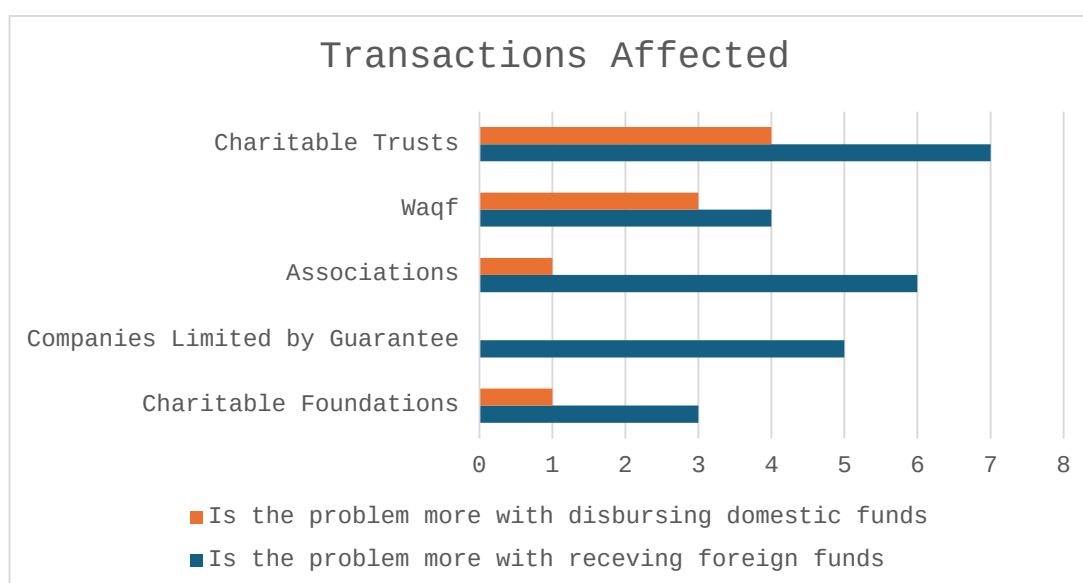
- 242 The survey included an open-text box for respondents to record any reasons they were given for problems encountered. The responses were in three categories: the most common response was to note a specific issue which had triggered the problem. Examples include insufficient funds, the NPO was dormant, a change in signatories, or non-resident signatories.
- 243 The second category of responses lamented the banks processes, noting that they “*have heavy and slow bureaucratic processes*”, and “*tend to be very prudent and request huge amount of documentation*”. One company noted that whilst they “*did not face outright rejection, the process involved multiple layers of documents, clarifications, and compliance steps that may have caused delays.*” One foundation’s account was temporarily suspended for not providing full Ultimate Beneficial Owner details, updated financial statements and organogram.
- 244 The final category noted that NPOs were treated as a special, higher-risk, case by some financial institutions, leading to delays in opening accounts.
- 245 Respondents who had had problems with banking services were asked to state the actions they had taken as a consequence. The most common responses were to change bank, expend more resource or try again. These responses increase NPOs’ costs, but ultimately do not increase risk or necessarily restrict legitimate activity. Of more concern are the 16 cases of NPOs using cash or personal bank accounts, which increase potential risk; and the six cases of NPOs cancelling or changing programmes, which may restrict legitimate activity.

Figure 23: Actions taken as a result of problems with banking services (Source: NPO surveys)



- 246 Notably, respondents reported that problems were more likely to be associated with foreign transactions. This is especially notable given that a small minority of NPOs transactions are cross-border (see section 2.2, above).

Figure 24: Transactions affected (Source: NPO surveys)



- 247 Respondents were asked to provide further details on their actions taken in an open text box. Few responses were received, and they mostly reported NPOs resolving issues through patience, or by providing further information, funds, or paying fees.
- 248 Of more concern, one Charitable Foundation noted that donors were asked to send money directly to a beneficiary, rather than through the NPO; and one foundation stated that the difficulties and time taken led the founder to dissolve the NPO. There is no evidence that these are systemic problems, but they are nonetheless examples of restrictions on legitimate NPO activity.
- 249 Overall, there is currently no evidence of widespread or systemic issues with financial access for NPOs in Mauritius. However, some isolated incidences have been recorded, and there is some evidence that NPOs are being treated as a high-risk by default. Authorities, NPOs and financial institutions should continue to monitor the issue and collaborate to identify solutions.

Conclusions

- 250 There is a low risk of TF abuse of NPOs in Mauritius. 98% of NPOs are assessed as having little or no exposure to TF risks. Of the 2% of NPOs that are most at risk, the most significant potential risks relate to the raising of funds by NPOs for humanitarian causes in high-risk jurisdictions; NPO links with high-risk jurisdictions; and the possible use of online crowdfunding or virtual assets to raise or move funds by or through NPOs for TF purposes. The legal form of Charitable Trust was assessed as exposed to a medium potential risk.
- 251 FATF requires measures to be in place which protect NPOs from TF abuse. These measures should be focused, proportionate, risk-based, and not unduly inhibit legitimate NPO activity. In line with these principles, the assessment of the measures in place is guided by the overall low-risk environment.
- 252 Overall, the measures are assessed as effective. For Associations, Charitable Foundations, Companies Limited by Guarantee and Waqfs (which comprise 99.2% of the sector), most measures were assessed as effective. This includes measures relating to outreach; understanding the potential TF risks to NPOs; obtaining information on NPOs; monitoring of NPOs (Associations, Companies Limited by Guarantee, Charitable Foundations, Waqfs); sanctions; and investigations.
- 253 Some minor deficiencies were noted in the implementation of measures to identify individual NPOs exposed to risk factors (oversight); in relation to monitoring (Waqfs, online crowdfunding); and in relation to information sharing between authorities. More generally, deficiencies were noted in the oversight and monitoring of Charitable Trusts, notwithstanding the rigorous supervisory regime for QTs.
- 254 There is no evidence that any measures restrict Mauritius' obligations under the Charter of the United Nations or international law. There is no evidence of widespread or systemic issues with financial access for NPOs in Mauritius, although some isolated incidences have been recorded.

Assessment of Residual Risk.

- 255 In relation to Associations, Charitable Foundations, Companies Limited by Guarantee and Waqfs, Mauritius is assessed as having an effective regime for preventing the potential abuse of NPOs for TF purposes, with only minor deficiencies. The inherent risk for these NPOs is low. Given the effectiveness of the mitigating measures, **the residual risk for Associations, Charitable Foundations, Companies Limited by Guarantee and Waqfs (which comprise 99.2% of the sector) is assessed as Very Low.**
- 256 Measures relating to the use of Virtual Assets by NPOs were assessed as adequate, in line with the assessment of R15 as Largely Compliant. With no direct evidence of the misuse of virtual assets within NPOs, **the residual risk in relation to the use of virtual assets is assessed as Low.**
- 257 The adoption of new legislation relating to online crowdfunding is noted, but the measures are assessed as deficient as the law is yet to be proclaimed. In mitigation, the volume of online crowdfunding by NPOs is low, and there is no direct evidence of the misuse of online crowdfunding for TF purposes. In this context, **the residual risk relating to the possible use of online crowdfunding by NPOs is assessed as Low-Medium.**
- 258 Any funds transferred to a high-risk jurisdiction through banking services or virtual assets would be identified through a STR, and subject to review. Associations, Charitable Foundations or Companies Limited by Guarantee linked to high-risk jurisdictions would be identified as higher risk as part of the routine monitoring processes of the relevant regulator and subject to a review of financial transactions. The role of QTs in relation to Charitable Trusts, and the more rigorous supervision they are subject to, make it likely that any such activity would be quickly identified by the QTs. For raising humanitarian funds for use in high-risk jurisdictions, the residual risk is therefore assessed as **Low.**

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- 259 For sending or receiving funds to/from high-risk jurisdictions, see the analysis in the paragraph above. The residual risk is assessed as **Low**.
- 260 For individuals from high-risk jurisdiction being in a position of control of NPOs, the residual risk is currently assessed as **Low-Medium**.
- 261 Deficiencies were noted in relation to the oversight and monitoring of Charitable Trusts. In mitigation, there are very few Charitable Trusts; they are managed by QTs who are rigorously supervised; and there is no evidence or suspicion of any TF abuse. In this context, **the residual risk relating to Charitable Trusts is assessed as Low-Medium**.

Annex 1: Selected FATF Standards

Recommendation 8

RECOMMENDATION 8

NON-PROFIT ORGANISATIONS

Recommendation 8. Non-profit organisations *

Countries should identify the organisations which fall within the FATF definition of non-profit organisations (NPOs) and assess their terrorist financing risks. Countries should have in place focused, proportionate and risk-based measures, without unduly disrupting or discouraging legitimate NPO activities, in line with the risk-based approach. The purpose of these measures is to protect such NPOs from terrorist financing abuse, including:

- (a) by terrorist organisations posing as legitimate entities;
- (b) by exploiting legitimate entities as conduits for terrorist financing, including for the purpose of escaping asset-freezing measures; and
- (c) by concealing or obscuring the clandestine diversion of funds intended for legitimate purposes to terrorist organisations

Technical Compliance- Recommendation 8

Note to Assessors:

Assessors should refer to the following Glossary definitions when assessing this Recommendation: accounts, appropriate authorities, associate NPOs, beneficiaries, competent authorities, country, funds, law, non-profit organisations (NPO), risk, self-regulatory measures, should, terrorist, terrorist financing (TF), terrorist financing abuse and terrorist organisation.

Assessors should consider, when assessing criteria 8.2 to 8.4 whether the elements apply without unduly disrupting or discouraging legitimate NPO activities.

Taking a risk-based approach

8.1 Since not all organisations working in the not-for-profit realm in a country are inherently high risk⁵⁹ without prejudice to the requirements of Recommendation 1, countries should:⁶⁰

- (a) identify which subset of organizations fall within the FATF definition of NPO;⁶¹
- (b) conduct a risk assessment of these NPOs to identify the nature of TF risks posed to them; and
- (c) have in place focused, proportionate and risk-based measures to address the TF risks identified, in line with the risk-based approach.⁶²

⁵⁹ NPOs are at varying degrees of risk of TF abuse by virtue of their types, activities or characteristics and the majority may represent low risk.

⁶⁰ The exercises described under subcriteria 8.1(a) to (c):

- a) should use all relevant and reliable sources of information, including through engagement with NPOs;
- b) could take a variety of forms and may or may not be a written product; and
- c) should be reviewed periodically.

Relevant and reliable sources of information may include, for example, information provided by regulators, tax authorities, FIUs, donor organisations or law enforcement and intelligence authorities.

⁶¹ For the purposes of this Recommendation, NPO refers to a legal person or arrangement or organisation that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of “good works”.

⁶² Countries may consider, where they exist, any self-regulatory measures and related internal control measures in place within NPOs for this requirement.

Note to assessors: Where countries consider self-regulatory measures and related internal control measures in place within NPOs, these measures should be taken into account when considering whether criterion 8.1(c) is satisfied.

Sustained outreach concerning terrorist financing issues⁶³

8.2 Countries should:

- (a) have clear policies to promote accountability, integrity and public confidence in the administration and management of NPOs;
- (b) undertake outreach and educational programmes as appropriate to raise and deepen awareness among NPOs as well as the donor community about the potential vulnerabilities of NPOs to terrorist financing abuse and terrorist financing risks and the measures that NPOs can take to protect themselves against such abuse;
- (c) work with NPOs to develop and refine best practices to address terrorist financing risk and thus protect them from terrorist financing abuse; and
- (d) encourage NPOs to conduct transactions via regulated financial and payment channels, wherever feasible, keeping in mind the varying capacities of financial sectors in different countries and areas and the risks of using cash.

Focused, proportionate and risk-based oversight or monitoring of NPOs

8.3 Countries should

- (a) take steps to promote focused, proportionate and risk-based oversight or monitoring of NPOs; and
- (b) demonstrate that they have in place focused, proportionate and risk-based measures applying to NPOs.⁶⁴

8.4 Appropriate authorities should:

- (a) monitor the compliance of NPOs with the focused, proportionate and risk-based measures being applied to them where needed;⁶⁵ and
- (b) be able to apply effective, proportionate and dissuasive sanctions for violations by NPOs or persons acting on behalf of these NPOs.⁶⁶

⁶³ For NPOs identified to be at low risk of TF abuse, countries may focus only on undertaking outreach concerning terrorist financing issues and may decide to refrain from taking additional mitigating measures.

⁶⁴ Some examples of measures that could be applied to NPOs, in whole or in part, depending on the risks identified are detailed in sub-paragraph 6(b) of INR.8. It is also possible that existing regulatory or other measures may already sufficiently address the current terrorist financing risk to the NPOs in a jurisdiction, although terrorist financing risks to the sector should be periodically re-assessed.

⁶⁵ In this context, risk-based measures may include self-regulatory measures and related internal control measures in place within NPOs.

⁶⁶ The range of such sanctions might include freezing of accounts, removal of trustees, fines, de-certification, delicensing and de-registration. This should not preclude parallel civil, administrative or criminal proceedings with respect to NPOs or persons acting on their behalf where appropriate.

Effective information gathering and investigation

8.5 Countries should:

- (a) ensure effective co-operation, co-ordination and information-sharing to the extent possible among all levels of appropriate authorities or organisations that hold relevant information on NPOs;
- (b) have investigative expertise and capability to examine those NPOs suspected of either being exploited by, or actively supporting, terrorist activity or terrorist organisations;
- (c) ensure that access to relevant information on the administration and management of particular NPOs (including financial and programmatic information) may be obtained during the course of an investigation; and
- (d) establish appropriate mechanisms to ensure that, when there is suspicion or reasonable grounds to suspect that a particular NPO:
 - (i) is involved in terrorist financing abuse and/or is a front for fundraising by a terrorist organisation;
 - (ii) is being exploited as a conduit for terrorist financing, including for the purpose of escaping asset freezing measures, or other forms of terrorist support; or
 - (iii) is concealing or obscuring the clandestine diversion of funds intended for legitimate purposes but redirected for the benefit of terrorists or terrorist organisations, that this information is promptly shared with competent authorities, in order to take preventive or investigative action.

Effective capacity to respond to international requests for information about an NPO of concern

- #### 8.6 Countries should identify appropriate points of contact and procedures to respond to international requests for information regarding particular NPOs suspected of terrorist financing or involvement in other forms of terrorist support.

Effectiveness- Immediate Outcome 10

Immediate Outcome 10

Terrorists, terrorist organisations and terrorist financiers are prevented from raising, moving and using funds

Characteristics of an effective system

Terrorists, terrorist organisations and terrorist financiers are identified and deprived of the resources and means to finance or support terrorist activities and organisations. This includes proper implementation of targeted financial sanctions against persons and entities designated by the United Nations Security Council and under applicable national or supra-national sanctions regimes. The country also has a good understanding of the terrorist financing risks and takes appropriate and proportionate actions to mitigate those risks. These include focused, proportionate and risk-based measures that prevent the raising and moving of funds through NPOs or methods which are at risk of being misused by terrorists, without unduly disrupting or discouraging legitimate NPO activities. Ultimately, this reduces terrorist financing flows, which would prevent terrorist acts.

This outcome relates primarily to Recommendations 1, 4, 6 and 8, and also elements of Recommendations 14, 15, 16, 26, 30 to 32, 35, 37, 38 and 40.

Note to Assessors:

1 Assessors should refer to the following Glossary definitions when assessing this Immediate Outcome: *accounts, appropriate authorities, competent authorities, country, designated nonfinancial businesses and professions (DNFBP); designated person or entity, designation, financial group, financial institutions, freeze, funds, funds or other assets, non-profit organisations (NPO), risk, seize, self-regulatory measures, should, targeted financial sanctions, terrorist, terrorist act, terrorist financing (TF), terrorist financing abuse, terrorist organisation and without delay.*

2 When assessing core issues 10.2 to 10.5, assessors should consider whether activities and measures are aligned with TF risk, including but not limited to:

- (a) the overall level of TF risks;
- (b) the characteristics of the domestic and cross-border TF activity (e.g. collection, movement and use of funds or other assets); and
- (c) the country's prevailing TF methods, techniques and trends.

3 Assessors should also consider the relevant findings on the level of international co-operation which competent authorities are participating in when assessing this Immediate Outcome.

Core Issues to be considered in determining if the Outcome is being achieved

10.3. To what extent, without unduly disrupting or discouraging legitimate NPO activities, has the country applied focused, proportionate and risk-based mitigation measures to only those organisations which fall within the FATF definition of NPOs, in line with identified TF risk?

a) Examples of Information that could support the conclusions on Core Issues

4. Information on sustained outreach and targeted risk-based supervision and monitoring of NPOs that the country has identified as being at risk of terrorist financing abuse (*e.g. frequency of review and monitoring of such NPOs (including risk assessments); frequency of engagement and outreach (including guidance) to NPOs regarding CFT measures and trends; remedial measures and sanctions taken against NPOs*).

b) Examples of Specific Factors that could support the conclusions on Core Issues

10. To what extent does the country understand the level of risk of organisations that fall within the FATF definition of NPO, and the nature of TF threats posed to them?

11. For NPOs identified as low risk of TF abuse, to what extent is the country's level of outreach consistent with the level of identified risk?

12. For NPOs other than those identified to be at low risk, to what extent are all four of the following elements being used to identify, prevent and combat terrorist financing abuse of NPOs without unduly disrupting or discouraging legitimate NPO activities: (a) sustained outreach; (b) targeted risk-based oversight or monitoring; (c) effective investigation and information gathering; and (d) effective mechanisms for international co-operation? To what extent are the measures being applied focused proportionate and risk-based?

13. To what extent are appropriate investigative, criminal, civil or administrative actions, cooperation and co-ordination mechanisms applied to NPOs suspected of being exploited by, or actively supporting terrorist activity or terrorist organisations? Do the appropriate authorities have adequate resources to perform their outreach/oversight/monitoring/investigation duties effectively?

14. How well do NPOs understand the nature of TF threats posed to them and apply measures to protect themselves from the threat of terrorist abuse?

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17. Do the relevant competent authorities, including those responsible for oversight, monitoring and investigation of NPOs, have adequate resources to manage their work or address the terrorist financing risks adequately.

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