

**Question for written answer E-001615/2022
to the Commission**
Rule 138
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Subject: Flexibility of the EU Anti-Money Laundering and Combating Financing of Terrorism Framework in the context of the invasion of Ukraine

On 27 April 2022, the European Banking Authority (EBA) published a statement on financial inclusion in the context of the invasion of Ukraine, clarifying the flexibility of the Anti-Money Laundering and Combating Financing of Terrorism Framework when engaging with refugees from Ukraine. For example, financial institutions can apply simplified customer due diligence in situations where the money laundering/terrorist financing (ML/TF) risk is reduced and do not need to check the prospective customer's passport to verify their identity, and can instead rely on other documentation, such as evidence that the prospective customer is a refugee from Ukraine. According to EBA guidelines 4.40 to 4.44, financial institutions should consider relevant risk factors including who their customer is when assessing ML/TF risk (13), and they list a number of control questions to determine customer risk factors. Although Ukraine is not on the Financial Action Task Force list of countries that have been identified as having strategic anti-money laundering deficiencies, money laundering remains a significant problem in Ukraine. In March 2014, the Council adopted sanctions against 18 Ukrainian persons identified as responsible for the misappropriation of Ukrainian State funds¹. Ukraine scores 33 on Transparency International's Corruption Perceptions Index.

Is the widespread corruption culture in Ukraine taken into account as a risk factor when identifying ML/TF risk and assessing customer risk factors?

¹ Council Decision 2014/119/CFSP of 5 March 2014 concerning restrictive measures directed against certain persons, entities and bodies in view of the situation in Ukraine (OJ L 66, 6.3.2014, p. 26); Council Regulation (EU) No 208/2014 of 5 March 2014 concerning restrictive measures directed against certain persons, entities and bodies in view of the situation in Ukraine (OJ L 66, 6.3.2014, p. 1).