



NATIONAL ANTI-MONEY LAUNDERING, COMBATING THE FINANCING OF TERRORISM, AND PROLIFERATION OF WEAPONS OF MASS DESTRUCTION STRATEGY AND ACTION PLAN

REPUBLIC OF SIERRA LEONE

2025-2029

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FOREWORD

I am pleased to present the National Strategy and Action Plan for Anti-Money Laundering, Combating the Financing of Terrorism, and Countering Proliferation Financing (AML/CFT/CPF) for the Republic of Sierra Leone. This document serves as a strategic blueprint to secure our financial system and protect our nation's economic future.

In today's complex global landscape, financial integrity is synonymous with national security and economic resilience. The threats of money laundering, terrorist financing, and proliferation financing undermine our institutions, threaten our stability, and deter the foreign investment essential for our development. This Strategy is our comprehensive response and a clear signal of our commitment to building a robust and reputable financial environment.

Sierra Leone is fully committed to its national, regional, and global obligations in the fight against financial crime. We will continue to collaborate closely with regional and international bodies, as well as all our development partners, to decisively address the deficiencies and risks identified within our national AML/CFT regime. This Action Plan is the tangible manifestation of that commitment.

Diligent execution of this Plan is essential. It will create a secure financial system that supports inclusive economic development, attracts responsible investment, and delivers national prosperity for all Sierra Leoneans.

As Minister of Finance and Chairman of the Advisory Board of the Financial Intelligence Agency, I fully endorse this National AML/CFT/CPF Strategy and Action Plan. I urge all stakeholders in the public and private sectors to fulfill their critical roles. Together, let us implement this vision to ensure a safer and more prosperous Sierra Leone for future generations.



Hon. Sheku Ahmed Fantamadi Bangura

Minister of Finance

Chairman, Advisory Board of the Financial Intelligence Agency

Republic of Sierra Leone

ACKNOWLEDGEMENT

With the successful completion of the National Strategy and Action Plan for Anti-Money Laundering, Combating the Financing of Terrorism, and Countering Proliferation Financing (AML/CFT/CPF), I extend profound gratitude to the individuals and institutions whose collective effort and support made this achievement possible. Foremost, I acknowledge the steadfast leadership, strategic guidance, and invaluable oversight of the Chairman and members of the Advisory Board of the Financial Intelligence Agency. Their wisdom and direction were instrumental in shaping the vision and ambition of this Strategy.

My sincere appreciation goes to the representatives from our law enforcement and security agencies, supervisory bodies, financial institutions, and Designated Non-Financial Businesses and Professions (DNFBPs). Your technical expertise and insights were crucial in developing effective measures. The engagement of representatives from Non-Profit Organisations (NPOs), Academia, and the Media has also been vital, ensuring our approach is inclusive, informed, and transparent.

The development of this Strategy was enhanced by the financial and technical support of the World Bank, administered through the Second Financial Inclusion Project. This partnership was essential for a process of this scope and complexity.

I am grateful to the international consultant and his team for their expert guidance, which helped align our national context with international best practices.

Finally, I commend the dedication, technical proficiency, and commitment of the staff of the Planning and Coordinating Secretariat and the entire Financial Intelligence Agency. You are the backbone of this endeavour, and your hard work has been essential in translating a concept into a comprehensive national blueprint.

This document stands as a testament to the power of collaboration. As we embark on the critical implementation phase, I am confident that the same spirit of partnership will guide us toward a more resilient and secure financial system for the prosperity of Sierra Leone.



David N Borbor

Director-General

Financial Intelligence Agency

Republic of Sierra Leone

Executive Summary

One of the major global challenges is the issue of combating money laundering (ML), terrorist financing (TF) and proliferation financing (PF). Countries and jurisdictions across the world are making frantic efforts to address the scourges and deleterious consequences of these catastrophic crimes. The perpetration of these crimes affects the soundness and integrity of any financial system and overall economic development.

In the last two decades, Sierra Leone has keyed into the global network on Anti-Money Laundering, Combating the Financing of Terrorism and Proliferation Financing (AML/CFT/CPF). The country has made concerted efforts through legislative reforms, establishment / strengthening of institutions and assessment of risk of money laundering and its predicate offences including terrorist financing. Also, despite its limited resources, Sierra Leone has developed strategies in response to counter these crimes especially emerging ML/TF/PF risks.

As part of its efforts, Sierra Leone has put in place several AML/CFT/CPF frameworks including legal and institutional that set the roles and responsibilities of diverse stakeholders, competent authorities (public sector), private sector, non-state actors as well as other special interest groups. The legal instruments are designed in consonance with the fundamental principles of domestic laws to promote human rights, the rule of law and the privacy of the citizens, residents and business entities.

Sierra Leone has subjected itself to two mutual evaluation exercises in 2007 and 2019 respectively and has been relatively consistent in addressing the identified gaps in its AML/CFT/CPF regime. The country has demonstrated high-level commitment to ensuring implementation of robust AML/CFT/CPF measures in line with international Standards. The efforts involve co-ordination, cooperation and collaboration among key stakeholders, including the private sector that play critical roles in the implementation of preventive, disruptive and detective measures.

In view of the transnational nature of ML/TF/PF, Sierra Leone continues to cooperate with other countries of the world in the fight against these crimes. As a member of the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA), Sierra Leone continues to play critical roles at the regional platform through participation in the peer review mechanism of mutual evaluations, information sharing and making active input into regional typologies

Despite these efforts, Sierra Leone is still grappling with some fundamental gaps in its AML/CFT/CPF system. The second Mutual Evaluation Report (MER) published in 2020 revealed the following significant deficiencies among others:

Absence of comprehensive national AML/CFT/CPF Strategy to guide implementation of effective AML/CFT/CPF measures.

Negligible use of financial intelligence produced by the Sierra Leone Financial Intelligence Agency (FIA) to initiate investigations by Law Enforcement Agencies (LEAs)

Poor implementation of preventive measures by the Designated Non-Financial Businesses and Professions (DNFBPs)

Non application of available sanctions regime for non-compliance

Non implementation of Targeted Financial Sanctions (TFS) obligations by most reporting entities

Lack of risk assessment of the NPO sector especially to identify NPOs at risk of TF

Weak currency declaration measures at the borders

Weak framework for managing confiscated assets

Lack of operational procedure to identify and investigate offences relating to the financing of terrorism

Lack of prioritization of ML investigations

Lack of expertise on parallel financial investigations

Non prioritization of confiscation of proceeds of crime, instrumentalities and property of equivalent value as a policy objective.

Sierra Leone is desirous to implement the Recommended Actions (RAs) in the MER to address the identified strategic deficiencies in its AML/CFT/CPF system. Consequently, the country has developed this 2025-2029 National AML/CFT/CPF Strategy as a springboard to provide clear directions for the implementation of an effective AML/CFT/CPF system. The Strategy is a further demonstration of the political commitment, accountability and transparency towards a robust AML/CFT/CPF regime in the country. The National AML/CFT/CPF Strategy has considered contextual peculiarities of the country, evolving ML/TF/PF threat environment as identified through various national and sectorial risk assessments conducted over the period, the structural changes in the global AML/CFT/CPF landscape, and impact of disruptive periods including technological changes especially in the delivery of financial services and products.

The Strategy is designed based on the following six (6) mutually reinforcing Strategic Pillars.

Pillar 1: Strengthening Legal and Institutional framework – review of extant legal infrastructure; development of new laws and other enforceable means; review of institutional set-ups including resourcing; autonomy and independence; guidance on mechanism for TFS; etc.

Pillar 2: Effective and Efficient AML/CFT/CPF Regulation and Supervision – adoption of risk-based supervision; collaboration among supervisors; application of sanction regime for non-compliance, guidance and feedback mechanism, financial inclusion; etc.

Pillar 3: Strengthening Operational Effectiveness in the fight against ML/TF/PF – effectiveness of investigations and prosecution; review of mandates; specialisation in

AML/CFT/CPF matters; adequacy of personnel in terms of quality and quantity; intelligence usage; confiscation; asset recovery and management; data collection process; etc.

Pillar 4: Enhancing National Coordination and International Cooperation - effectiveness of Advisory Board and Inter-Ministerial Committee (IMC) at both operational and policy levels; public-private partnerships model; communication of policies; international cooperation on mutual legal assistance (MLA); information sharing; asset recovery mechanism; membership of international platforms; preparation for the third round of mutual evaluation; etc.

Pillar 5: Enhancing Transparency and Beneficial Ownership (BO) of Legal Persons and Legal Arrangements – Centralisation of information; risk assessment; sanction regime; availability and timely access to adequate, accurate and up-to-date BO information; etc.

Pillar 6: Strengthening Capacity and Awareness Raising Program – holistic capacity building (institutional and individual) programs; advocacy and mobilisation of various interest groups, awareness and outreach programs; incentivisation and retention of competent personnel; etc.

To ensure the success of the Strategy, its overall implementation will be guided by the Advisory Board as constituted by the authorities. The technical coordination will be driven by the Financial Intelligence Agency (FIA). Each stakeholder institution will be expected to establish a specialised AML/CFT/CPF and Observatory Unit for coordinating the implementation and monitoring progress. The Strategy will be implemented through several activities under each Pillar using High-Level Results-Based Management (RBM) framework presented in an Action Plan showing the key pillars, objectives, key result areas/activities; outputs; outcomes; timelines; and responsibilities. The verifiable indicators will be presented in an Outcome Framework.

The Strategy is a veritable framework for effectiveness of the AML/CFT/CPF system in the country. It is designed to facilitate consistency and accountability in the implementation of AML/CFT/CPF measures in line with International Standards. Overall, the Strategy is to enable enhanced performance in complying with AML/CFT/CPF requirements at all levels (national, sectoral and institutional) thereby positioning the country as a safe and investment friendly destination.

In line with emerging ML/TF/PF risks and prevailing contextual circumstances of the country, the Strategy will undergo periodic reviews and updates accordingly. Hence, apart from annual reports by the FIA, the Strategy will be subjected to two external reviews at mid-term (2027) and end-term (2029).

CHAPTER ONE

1.0 Introduction and Rationale

Money laundering and its associated predicate offences remain major challenges globally particularly their impact on the integrity of the financial systems and overall national security. The deleterious consequences of these scourges are on the ordinary Sierra Leoneans as they undermine the progress towards achieving the Global Agenda 2030 on Sustainable Development Goals (SDGs), capacity to forestall the realisation of African Union Agenda 2063 – “The Africa We Want” and the ECOWAS Vision 2050. Sierra Leone being a low capacity and low-income country, the impact of ML/TF/PF risks transcend all sectors of the economy – financial, education, health, security, environment, governance, transportation and general business environment. In particular, the prevalence of several income-generating crimes such as corruption, drug trafficking; environmental crimes undermine the rule of law and transparency, erodes public trust and confidence in key national institutions and the private sector including the financial sector and other corporate entities.

The Sierra Leone National AML/CFT/CPF Strategy 2025 – 2029 represents a landmark leap in the country’s desire to be a regional force in the global fight against ML/TF/PF. The Strategy will assist the Government of Sierra Leone to address the identified significant deficiencies in its AML/CFT/CPF regime in a systematic manner within defined timeframe. The Strategy aligns with the national priorities to address the overall national security issues. The Strategy sets the main policies and objectives of the country for combating ML/TF/PF in a concerted manner. It also describes the priorities and expected actions to be taken by all relevant stakeholders within given timeframe. This Strategy is a derivative of the findings of various risk assessments (National Risk Assessment (NRA) and Sectoral), threat assessments and the MER, thus actions contained are recommended priorities to ensure that effectiveness of the AML/CFT/CPF system is achieved at high level.

The National AML/CFT/CPF Strategy 2025 – 2029 is a paradigm shift in the implementation of effective AML/CFT/CPF measures as it takes cognizance of emerging ML/TF/PF risks such as impact of new financial technologies associated with Virtual Assets (VAs) and Virtual Assets Service Providers (VASPs). It recognises the weaknesses in the legal framework, institutional arrangement, preventive measures and challenges in the investigation and prosecution of ML/TF/PF cases. Also, the Strategy considers the need for effective national cooperation, coordination and collaboration mechanisms. In addition, the transnational dimensions of the crimes call for strengthening international cooperation by addressing the gaps in deploying veritable mutual legal assistance (MLA) platforms.

The Strategy will among other things achieve the following:

Reduce ML/TF/PF threat to the financial sector and Designated Non-Financial Businesses and Professions (DNFBPs)

Strengthen national security in the country

Prevent criminals from exploiting institutions, especially the financial system and DNFBP sector, thereby improving level of compliance with international AML/CFT/CPF Standards

Enable the country to undertake meaningful development through judicious use of recovered stolen assets and reduction in illicit financial flows

In view of the emerging challenges confronting Sierra Leone in its efforts to implement robust AML/CFT/CPF regime, the focus of this Strategy will among others be:

Strengthening the legal and regulatory framework

Improving risk assessment framework and programs at macro, meso and micro levels

Strengthening Stakeholder institutions through increased resourcing and capacity building at both institutional and individual levels

Enhancing national Cooperation, Coordination and Collaboration (aka C3)

Promoting International Cooperation

Promoting culture of compliance among reporting entities

Ensuring effective risk-based supervision and monitoring of implementation of AML/CFT/CPF measures

Enhancing regulatory sanctions regime that is effective, dissuasive and proportionate

Enhancing law enforcement actions and processes to facilitate investigation, prosecution and speedy adjudication of ML/TF/PF cases

Undertaking effective outreach and guidance programs

Preparing for the 3rd Round Mutual Evaluation Exercise

Strengthening public-private partnership and improving involvement of non-state actors

1.1 ***Vision***

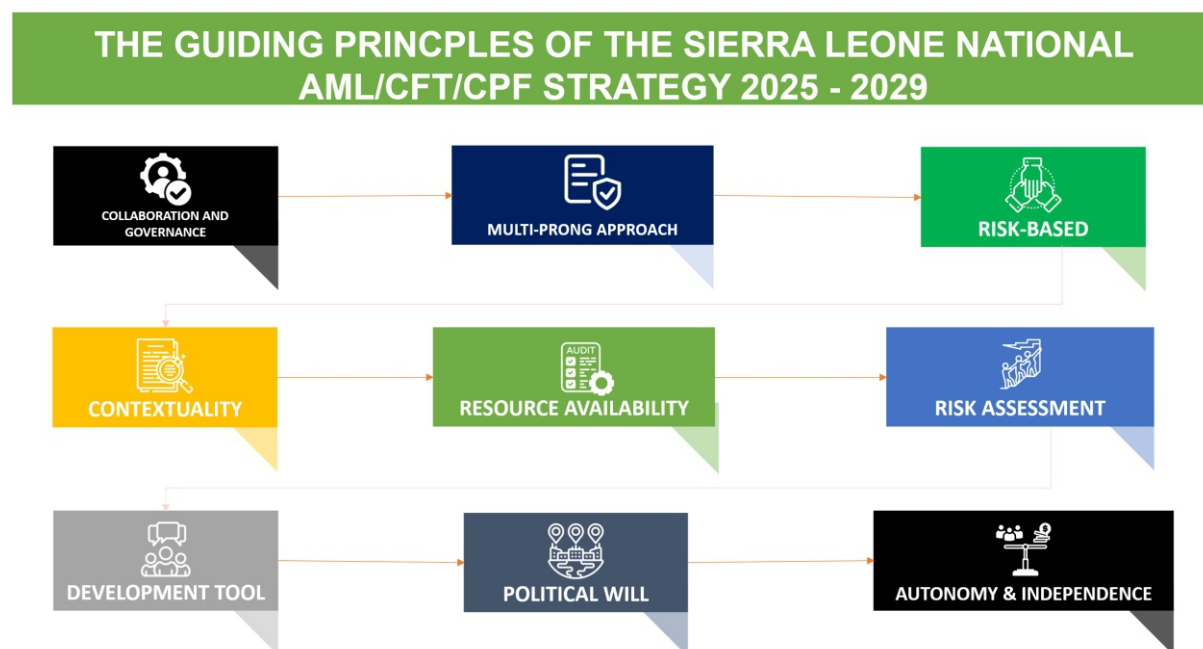
To be a national champion and regional player in building a strong, responsive and dynamic AML/CFT/CPF System in line with international Standards

1.2 ***Mission***

To implement a robust and risk-based AML/CFT/CPF framework that strengthens national institutions, enhances cooperation and information sharing, and empowers public and private stakeholders to detect, deter, and disrupt financial crimes in line with FATF recommendations and national development priorities.

1.3 Guiding Principles

The development and implementation of this Strategy are guided by the following principles.



1.3.1 National Collaboration and Governance

All relevant stakeholders will be involved in the implementation of this Strategy in a collaborative manner to promote ownership of the process. Effective governance facilitates inclusiveness, integrity and transparency.

1.3.2 Multi-Prong Approach

The overall goal of a robust AML/CFT/CPF regime is to ensure that profits (including any form of economic benefits) are taken away from crime and no money for terror through the 3-D (detect, deter and disrupt) framework. This requires the deployment of a gamut of multiple measures including supervision, regulation, law enforcement and preventive measures by competent authorities and reporting entities as well as non-state actors in a concerted manner to achieve the desired outcomes.

1.3.3 Risk-Based

This Strategy calls for consistent application of Risk-Based Approach in its implementation to ensure that resources are deployed according to identified priorities and effectiveness of the AML/CFT/CPF system is achieved at high level. The Strategy is a derivative of the findings of various risk assessments; threat assessments; MERs; and FURs

1.3.4 Contextuality

This Strategy is designed take into consideration the contextual factors as well as materiality and ML/TF/PF risks peculiar to Sierra Leone regarding political, economic, institutional, legal, financial, social, and other structural peculiarities.

1.3.5 Availability and Parsimony in Deployment of Resources

The success of this Strategy is anchored on the adequacy of resources and efficiency in the deployment. Thus, it is of strategic importance that all competent authorities especially the Financial Intelligence Agency (FIA) are given sufficient resources to undertake their mandates relating to AML/CFT/CPF matters separate from prudential functions. Also, reporting entities should set aside considerable resources for implementing their AML/CFT/CPF obligations.

1.3.6 Assessment of Emerging ML/TF/PF Risks

The sophistication and dynamism of criminal enterprises call for continuous review and assessment of the evolving ML/TF/PF risks to keep the criminals in check. Thus, this Strategy is guided by regular update of risk assessment at all levels (national, sectoral, institutional) and thematic areas.

1.3.7 Strategy as a Development Tool

This Strategy is designed to support structural transformation by ensuring resilience of institutions in their implementations of acceptable international AML/CFT/CPF requirements, promoting the desired awareness of the negative effects of ML/TF/PF and facilitating compliance by the private sector. Thus, it is not a tick box exercise, but a paradigm shift anchored on Effectiveness of the AML/CFT/CPF system. In particular, the Strategy will guide the development of robust guidelines for reporting entities to address the unintended consequences of misapplication of the FATF Standards especially for the NPOs at risk of TF.

1.3.8 Political Will

Tone at the top is essential for the successful implementation of this Strategy. Ownership of the Strategy by the political authorities is critical. Political authorities should ensure that adequate human, financial, technical and infrastructural resources are provided.

1.3.9 Institutional Autonomy and Independence

The Strategy envisages that all competent authorities should be accorded the desired level of autonomy and independence, without undue interference, to undertake their mandates within the ambit of the operating legal framework and constitutional provisions.

1.4 Purpose and Objectives of the Strategy

The National AML/CFT/CPF Strategy is designed to establish inclusive framework to implement a robust and an effective AML/CFT/CPF system of Sierra Leone during the period 2025 - 2029. The purpose of the Strategy is to cultivate intentional ownership of AML/CFT/CPF measures in the country by all stakeholders. The Strategy reiterates the need to take profit including all forms of economic benefits out of crime and to make Sierra Leone a safe and healthy economy for good investment decisions. It is expected that by implementing this Strategy, by year 2029 Sierra Leone would have attained High Level of Effectiveness in its AML/CFT/CPF regime.

CHAPTER TWO

2.0 AML/CFT/CPF Situational Analysis

2.1 General Economic Environment

Sierra Leone is a Low-Income Country (LIC) with a per capita income of US\$480 in 2022 and its GDP grew by 5.7% in 2023 from 5.5% in ¹2022. The economy of the country depends mainly on natural resources with low-addition and insufficient diversification. Despite the resilience of the economy, a major challenge is structural transformation due to low level of labour productivity prevalent in most of the sectors of the economy. According to reports, economic growth slow from 3.5 % in 2022 to 2.6% in 2023 because of increase in commodity prices in response to the Ukraine-Russian conflict. Inflation accelerated from 27% in 2022 to 46.6% in 2023 driven by prices of food and fuel. Poverty head count ratio was 56.8% in 2018 while extreme poverty rate in 2023 was 25%. Youth employment remains relatively high.

The last two decades have shown the world that uncertainties are the only certainties that prevail, hence while setting goals and developing plans are good, things may not necessarily go as planned or even happen at all. The interconnected world changes dramatically from off-line to virtual and local disruption in the supply chain could escalate worldwide. Things change rapidly, while technology evolves exponentially. These changes have been succinctly summarized by the BANI (Bristle, Anxious, Non-Linear, and Incomprehensible) concept which provides a broader perspective on the general nature of complex environments. Understanding the implications of BANI on AML/CFT/CPF compliance is critical as explained below.

Bristle: The regulatory landscape is changing rapidly at both international and regional levels. The FATF Standards have undergone several changes in recent years and the AML/CFT/CPF requirements are equally increasing. In addition, emergence of new financial products and services, and new technologies are impacting on implementation of AML/CFT/CPF measures and creating pressure on countries especially for low-capacity country like Sierra Leone. For instance, the revised FATF Recommendations 15 on New Technologies have great impact on effective implementation of AML/CFT/CPF obligations. Thus, an AML/CFT/CPF System that appears strong can easily be dislocated under such pressure and tackling resilience becomes a serious issue.

Anxious: The intricacies, interdependencies, the impact of globalization and interconnectedness of the financial systems, the sophistication of criminals, especially the growth in knowledge and mode of operations have impact on responses by countries and/or jurisdiction in putting in place a robust AML/CFT/CPF program. Furthermore, the need to comply with AML/CFT/CPF

¹ AfDB (2024): Country Focus Report: Driving Sierra Leone's Transformation – The Reform of the Global Financial architecture.

obligations from multiple jurisdictions with distinct requirements pose serious challenge to implementation of an effective AML/CFT/CPF system especially for low-capacity countries such as Sierra Leone, thus triggering anxiety and stress which further impair innovation in the design of robust AML/CFT/CPF measures.

Non-Linear: The unpredictability and lack of clarity about the future make it difficult to make informed decisions about certain issues. In particular, the development of new business models and associated risks have implications for AML/CFT/CPF measures in terms of building control measures to address these emerging risks. Application of a one-size-fits-all strategy is no longer achievable because the determination of cause-and-effect relationship is not straightforward thus making outcomes unpredictable.

Incomprehensible: The emergence of new technologies, and financial products and services create complex layers of ML/TF/PF risks that are difficult to identify, understand, assess and mitigate. Thus, it leads to ambiguity in applying appropriate AML/CFT/CPF measures.

To manage the BANI effects, countries and their institutions are expected to adopt relevant management frameworks to steer them through the maze of the megatrends caused by BANI. Countries should therefore craft perspective plans and medium-term strategic plans that articulate national or institutional vision, and a clear direction for improving economic development or business outcomes including addressing the effects of ML/TF/PF risks.

Therefore, having a good understanding of the implications of BANI for AML/CFT/CPF issues will enable Sierra Leone to:

- (i) Develop a more robust risk assessment process.
- (ii) Develop a more adaptive and dynamic AML/CFT/CPF compliance programs at national, sectoral and institutional levels that can respond to the changing environment
- (iii) Build different scenarios reflective of the various potential future conditions thus assisting prompt responses to any eventualities.
- (iv) Improve cooperation, collaboration and communication among various stakeholders in the AML/CFT/CPF value chain, thereby enhancing coordinated approach to implementation of effective AML/CFT/CPF regime.
- (v) Adopt an Agile and flexible approaches in implementing AML/CFT/CPF compliance requirements in an unpredictable environment.

In terms of the overall general environment that can impact effective implementation of AML/CFT/CPF, Sierra Leone also faces the following challenges.

There is a proliferation of NPOs and INGOs without a system of financial vetting to ensure that their sources of funds are legitimate, and this represents a vulnerability within the system.

There is a proliferation of religious houses without a mechanism for proper financial vetting to ensure that they are not used for the laundering of criminal proceeds, the financing of terrorism or other unlawful activities.

There are weak database management systems in most law enforcement agencies and this requires the urgent attention of competent authorities.

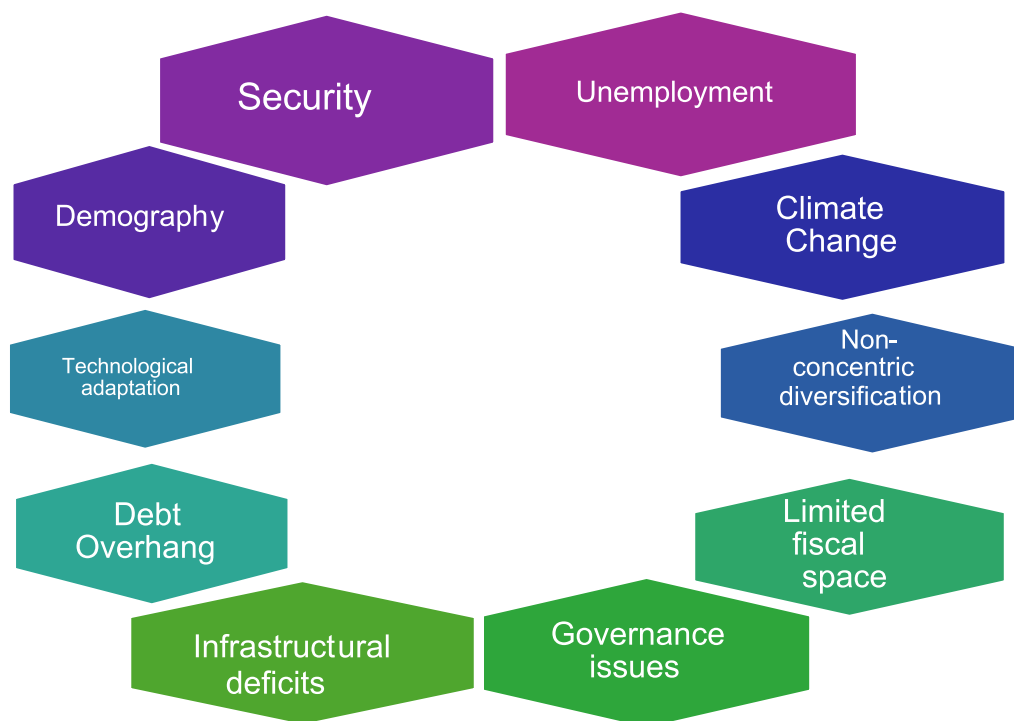
The porosity of sea borders remains a challenge to the country's effort to curb smuggling and the importation of prohibited goods.

The influx of people of different nationalities without proper documentations is a serious threat that needs to be addressed as a matter of urgency.

Illegal fishing and other forms of maritime violation represents a serious threat of money laundering and terrorism financing.

The movement of cash across borders remains one of the major challenges and it requires a national effort to combat money laundering and terrorism financing.

Over the years, in Sierra Leone the following megatrends shape the National AML/CFT/CPF landscapes and outcomes.



2.2 Existing legal and Institutional frameworks

The AML/CFT/CPF system in Sierra Leone is evolving and responding to emerging ML/TF/PF risks. Sierra Leone has ratified the relevant United Nations Conventions and enacted laws that amongst others, criminalize ML/TF/PF; establish and assign roles and responsibilities to various stakeholder institutions such as the FIA and other national Multidisciplinary Committees on Anti-Money Laundering to counter ML/TF/PF. All AML/CFT/CPF stakeholders both public and private are obliged to comply with

these various legal frameworks. Consequently, over the years, the country has developed and enacted the following extant and applicable legal infrastructure in line with domestic principles in the Constitution of the Republic of Sierra Leone to guide the implementation of robust AML/CFT/CPF regime.

- (i) AML/CFT/CPF Act, 2024
- (ii) Anti-Corruption (Amendment) Act, 2019
- (iii) The Companies (Amendment) Act, 2012
- (iv) The Banking Act, 2019
- (v) Bank of Sierra Leone Act, 2019
- (vi) The Insurance Act, 2016
- (vii) The Police Act, 1964
- (viii) The NDLEA (Amendment) Act, 2011
- (ix) The National Security and Central Intelligence Act, 2022
- (x) National Investment Board Act, 2022
- (xi) Registration of Business Act, 2007
- (xii) National Minerals Agency Act, 2012
- (xiii) Mines and Mineral Development Act, 2022
- (xiv) National Revenue Authority Act, 2022
- (xv) Devolution and Estates Act, 2007

In addition to the above laws, the following regulations and other enforceable means (OEMs) have been developed and issued to facilitate the implementation of AML/CFT/CPF measures in Sierra Leone.

- (i) Corporate Governance Code, 2017
- (ii) Directives on Tiered KYC, 2020

To facilitate good understanding of ML/TF/PF risks in the country, the following assessments and Roadmap have been undertaken and/or developed.

- (i) Second National ML/TF/PF Risk Assessment (NRA) Report, 2023
- (ii) National Cyber Risk Assessment Report, 2019
- (iii) ML Risk in Virtual Assts Service Providers, 2023
- (iv) Entry-Exit Point Financial Crime Threat Assessment 2024
- (v) National Threat Assessment 2024 – 2025
- (vi) Typology Report on ML/TF Risk in Precious Metal and Stones Sector, 2023
- (vii) AML/CFT/CPF Risk Assessment Framework
- (viii) Beneficial Ownership (BO) Road Map, 2016 – 2022

The Republic of Sierra Leone has put in place mechanisms to operationalise the outcomes of the various assessments by developing national and sectoral strategies and implementation plans such as:

- (i) National AML/CFT Strategy, 2009 – 2014
- (ii) National Anti-Corruption Strategy, 2014 – 2018

- (iii) National Anti-Corruption Strategy, 2019 – 2023
- (iv) NDLEA Strategy, 2023 – 2028
- (v) Anti-Trafficking in Persons Strategy, 2024 – 2028
- (vi) National Implementation Plan on ML/TF/PF, 2018 – 2022
- (vii) National Implementation Plan on ML/TF/PF, 2023 – 2028

From the foregoing, the AML/CFT/CPF regime of Sierra has evolved over the years with several legal and institutional frameworks put in place primarily to enhance the effectiveness of the AML/CFT/CPF regime in line with international Standards. Some of these initiatives include designation of relevant financial and designated business and professions as reporting persons for purposes of conducting CDD on risk-sensitive basis, requirements for conducting simplified CDD to low risks areas, maintenance of records, understanding and assessing risks and designing mitigation measures as well as existence of internal AML/CFT/CPF procedures. The recent amendments to various or development of AML/CFT/CPF related legal infrastructure (including the AML/CFT/CPF Act, ACC Act, CAC Act, NSCIA Act, NIB Act, and NRA Act) are demonstration of the efforts by the government of Sierra Leone to improve its legal and institutional frameworks in compliance with international standards and good practices. Of note is the adoption of the Anti-Money Laundering and Combating of Financing of Terrorism and Financing the Proliferation of Weapons of Mass Destruction Act, 2024 (AML/CFT/PF Act). The AML/CFT/PF Act repeals and replaces the AML/CFT Act 2012. This new law addressed most of the deficiencies identified by MER 2020 in Sierra Leone's AML/CFT system, significantly improving the country's Technical Compliance (TC) with the FATF Standards. Another notable change is the conduct of the sectoral assessment on Virtual Asset Service Providers (VASPs). Overall, Sierra Leone has made progress to address the TC deficiencies identified in the MER.

While the direct impact of these legal infrastructure on the effectiveness of the AML/CFT/CPF system cannot be ascertained, however, the building block, that is the technical compliance has shown remarkable improvement following re-rating of eight additional Recommendations (Recommendations 10,14, 15, 17, 18, 22, 32 and 38) from either Non-Compliant (NC) or Partially Compliant (PC) to Largely Complaint (LC) at the presentation of the Fourth Follow-Up Report (4th FUR) to the GIABA Plenary in November 2024.

2.3 ML/TF/PF Risk and Vulnerability Environment

2.3.1 National Risk Assessment

As a cornerstone to implementing effective and robust AML/CFT/CPF regimes and pursuant to FATF recommendations, jurisdictions are obliged to understand money

laundering, terrorist financing and proliferation financing (ML/TF/PF) risks and to adopt a Risk-Based Approach (RBA) and allocate resources according to the identified risks in order to effectively mitigate those risks.

The first National Risk Assessment Report (NRA) of Sierra Leone was adopted in 2019, and its implementation elapsed in 2020. The NRA noted that the following sectors and/or predicate offences were not covered as at then: NPO; Environmental Crime; Virtual Assets and Virtual Assets Service Providers. Also, these sectors were yet to be subjected to effective regulation for AML/CFT/CPF purposes. The NRA further highlighted the predominance of cash transactions among the gatekeepers thus making them to be highly vulnerable to ML/TF/PF risks. To address the gaps in the first NRA, Sierra Leone undertook a revision to the NRA in line with the FATF Recommendation 2.

In 2023, Sierra Leone conducted its second National Risk Assessment for the period 2018 to 2022 to identify, assess, and understand ML/TF/PF risks in Sierra Leone and to determine the mitigation measures. The following sectors were covered in the NRA - Banking sector, Other Financial Institutions, Environmental Crimes, Insurance and security sectors, DNFBPs, Legal persons and legal arrangements and Terrorism financing, proliferation financing and NPOs. The DNFBPs includes Lawyers, real estate agents, dealers in precious metals and stones, notaries, other independent legal professionals, accountants, auditors, tax advisors, casinos, clearing and forwarding agencies, shipping companies, and car dealers.

The NRA evaluated the threat and vulnerabilities of the various sectors to ML, TF and PF risks, with the overall objective of integrating ML/TF/PF risk mitigation measures into the National Strategy on Anti-Money Laundering and Combating the Financing of Terrorism and Proliferation Financing for the country.

The NRA reveal that Sierra Leone has good understanding of the ML/TF/PF risks it faces. However, the level of understanding of ML/TF/PF risks and AML/CFT obligations varies across the reporting entities. While large local and foreign owned or controlled banks have a good understanding of the ML/TF/PF risks, there is low understanding of ML/TF/PF risks and AML/CFT/CPF obligations by Non-Banking Financial Institutions and the DNFBP sectors which is attributable to lack or limited supervision and awareness. Related to this, apart from the Bank of Sierra Leone (BSL), the other AML/CFT/CPF supervisors have not yet adopted or commenced the implementation of AML/CFT/CPF risk-based supervision. Majority of the DNFBPs including the car dealers and real estate sector had no designated AML/CFT/CPF supervisors and therefore are not being properly supervised or monitored for compliance with their AML/CFT/CPF obligations. To address this strategic deficiency, the amended AML/CFT/CPF Act designated the FIA as regulator of all reporting entities with no designated supervisory authority.

To demonstrate the understanding of TF vulnerability risks, an Assessment of Terrorism Financing was carried as part of the second NRA and the report was

produced and was disseminated to all stakeholders for their reference and understanding of TF risks. Though TF risk is low in Sierra Leone, however, to effectively detect, investigate, mitigate and disrupt TF incidences that could occur in future, the LEAs have been exposed to various capacity building activities.

Also, Sierra Leone has identified the nature of threats posed by terrorist entities to the NPOs as well as how the terrorist actors abuse NPOs. Nonetheless, the NRA did not provide detail on various categories of NPOs in line with the FATF definition of NPOs at risk. Furthermore, the country has also identified, assessed and understood ML/TF/PF vulnerabilities of legal persons and legal arrangements created in the country, and the extent to which they can be or are being misused for ML/TF/PF purposes. However, the authorities do not have adequate supervisory capacity and mechanisms to ensure that accountable institution have access to BO information and that the basic information being kept by reporting entities is adequate, accurate and up to date.

Specifically, the key findings in the second NRA include the following, that:

- (i) The main high-income generating illicit activities are fraud, and corruption and bribery. Other proceeds generating crimes in Sierra Leone include Human trafficking and migrant smuggling. In addition, the prevalent financial crimes in the country include Money laundering; terrorist financing; embezzlement; larceny; abuse of office; racketeering. In summary, the eight most prevalent predicate offences of money laundering are: Robbery and Theft; Corruption and Bribery; Cybercrime; Murder and Grievous Bodily Harm; Environmental crimes; Fraud and Drug Trafficking. The NRA also noted that online scams/phishing as well as Advance Fee Fraud involving nationals are on the increase.
- (ii) Sierra Leone has taken proactive actions to address these emerging ML/TF/PF risks. In particular, the country in 2022 enacted the Anti-Human Trafficking and Migrant Smuggling Act with presumed proportionate and dissuasive sanctions including a minimum prison term of 25 years.
- (iii) Some sub-sectors of DNFBPs are yet to be regulated especially the gaming industry for both prudential and AML/CFT/CPF purposes, and no designated supervisors designated for the sub-sector.
- (iv) Informal sector remains relatively large with significant threat to the formal financial system due to the opaqueness of transactions that inhibits traceability of the volume of businesses in those sectors.
- (v) Challenges associated with Beneficial ownership and transparency of legal persons and legal arrangements remain unresolved in Sierra Leone as companies are still formed without the disclosure of the identity of natural persons with ultimate control. Also, cross-border international syndicates and professional money launderers through trade-based money laundering schemes are involved in creating complex layers that hide the identity of the Ultimate Beneficial Owner (UBO) thus impacting the capacity of Law Enforcement Agencies (LEAs) to trace and investigate the criminals.

- (vi) The Insurance sector is also an enabler of ML/TF/PF activities due to the relatively large flow of funds in the sector.
- (vii) The overall ML risk is medium, but its overall vulnerability is high. For TF, the overall risk is considered low with high vulnerability.
- (viii) The full range of predicate offences of ML has been criminalised, but limited penalty (custodian sentences) provided for criminals who are natural persons.
- (ix) Terrorist financing has been criminalised while terrorism as an offence is yet to be.
- (x) Proliferation financing is yet to be fully criminalised
- (xi) There are no mechanisms for implementing Targeted Financial Sanctions (TFS) related to both TF and PF.
- (xii) There is limited access and use of financial intelligence by competent authorities. While the FIA produces financial intelligence reports, these products are being underutilized in the ML/TF/PF investigation and prosecution value chain, and also by supervisory bodies. LEAs rely on other sources of information to detect and investigate ML and pursue confiscation.
- (xiii) The authorities have also not prioritized ML investigations but still focus on conventional investigation of predicate offences.
- (xiv) Confiscation results are not largely consistent with the ML/TF/PF risk profile of the country.

2.3.2 International Cooperation

The NRA noted that Sierra Leone has in place a good legal and institutional framework to cooperate and exchange information with foreign counterparts (see Sections 122; 137 and 141 of AML/CFT/CPF Act 2024) in respect of mutual legal assistance (MLA) and other forms of international cooperation. However, the country has applied these measures mainly on predicate offences. The effectiveness of cooperation is undermined by inadequacies and lack of capacity to pursue parallel financial investigation when investigating predicate offences. According to the 4th FUR, the following gaps still exist with respect to mutual legal assistance:

- i. There is no case management system or process in place to determine the timely prioritisation and execution of MLA request.
- ii. The range of investigative techniques available domestically for conducting ML/TF/PF cases is limited.
- iii. There is lack of a clear processes or arrangements to coordinate the seizure and confiscation measures in transnational cases.
- iv. There is no requirement that dual criminality should be deemed to have been satisfied where both countries criminalise the conduct underlying the offence.
- v. Overall, the competent authorities do not have adequate capacity both in terms of human and financial resources to effectively carry out their AML/CFT/CPF responsibilities.

Sierra Leone has developed key priority actions to address those identified threats and vulnerabilities based on the findings in the NRA. Consequently, an implementation

plan has been designed to serve as the roadmap for various competent authorities to take required measures in addressing the identified gaps in the National Risk Assessment Report. The implementation plans consist of objectives, identified issues, proposed measures/actions, clear and realistic timelines, and resource requirements. An 'on-going' timeline implies a collaborative periodic review by all stakeholder institutions of the progress relating the specific measures. The Implementation Plan is anchored on the following three (3) strategic core principles: Political Leadership, Think Big and Start Small, and Domestic Cooperation and Coordination. The Financial Intelligence Unit is designated to serve as the coordinating Secretariat for the implementation of the Action plan.

2.4 Financial Sector

2.4.1 Overview and Composition of Financial Sector in Sierra Leone

The total financial assets of Sierra Leone as at 2014 were USD 1.174 million (a market volume of about US\$719.5m net interest income) or about 48% of the country's GDP. Over 90% of the total financial assets comes from the banking sector consisting of 14 commercial banks, (eleven (11) foreign-owned banks, two (2) state-owned banks and one (1) domestic privately owned); 17 community banks and 50 microfinance institutions. The commercial banks account for about 82.5% of the total financial assets as at end of 2022 while the pension fund is responsible for 11.4% of the total assets. The banking market is projected to grow with a compound annual growth rate (CAGR) of 5.37% from 2024 and the market is estimated to attain a market volume of US\$934.80m by 2029. Despite this relatively large financial sector, only about 12.4% of adults in Sierra Leone have a bank account, thus, the informal sector is quite high calling for greater attention to be paid to this scenario so that the informal sector is not misused for the purpose of money laundering, terrorist financing and proliferation financing.

2.4.2 Legal Framework for Financial Sector

Part II, sections 6 and 7 of the Banking Act 2019 provide for licensing of banks and other businesses soliciting deposits from the public. Section 3(2)(b) of the Insurance Act 2016 provides for the registration of insurers, re-insurers and insurance intermediaries. Also, Insurance companies are required to register with SLICOM (s16 (1) and 18(1) of the Insurance Act 2016). As Core Principles of FIs, insurance companies should be required to be licensed and not registered. Section 85(1) of the FIA Act establishes six institutions as primary supervisions and s85(2) designated the FIA as a primary supervisor for reporting entities who do not have supervisory authority until one is designated.

Section 19 of the Banking Act 2019 states that no one can become a director, executive director, deputy executive director, or executive officer of a bank, without obtaining the prior approval of the Bank of Sierra Leone. Also, section 25(3) of the

banking Act states that persons holding “significant or controlling shareholders, beneficial owners, directors and key management personnel are fit and proper persons”. Furthermore, in section 19 (1)(g) of the Insurance Act, directors and shareholders of the applicant should not be persons who have been convicted of any criminal offense involving fraud and dishonesty.

The above legal frameworks are silent on conducting ongoing ‘fit and proper’ tests for existing shareholders and management staff to ensure they continue to maintain their integrity and competence based on R26.6. Furthermore, fit and proper tests do not cover associates of criminals. The SLICOM is not a member of the International Association of Insurance Supervisors (IAIS) and there is no requirement for it to apply consolidated supervision. Another lacuna in the legal framework is lack of risk-based supervision of FIs due to absence of ML/TF/PF risk assessment that could inform the inspection period, allocation of resources and other compliance measures based on the NRA. Also, the BSL is yet to conduct compliance inspections on the security sector.

Sections 87 and 88 of the FIA Act provide for powers to examine records and enforce compliance. Similarly, s63 and s78 of the Insurance Act 2016 grants both SLICOM and the FIA the power to compel the production of any information. With respect to sanctions regime, S62 of the Banking Act, 2019 and sections 75(2), 90 and 91 of the Insurance Act 2016 provide ranges of sanctions. However, the sanctions especially fines are not dissuasive and proportionate as highlighted in the MER.

The definition of PEPs in s1 of the FIA Act is in line with FATF, however, the application of the due processes and procedures as provided for in s63 only placed emphasis on international PEPs. The FIA is a member of Egmont Group; however, its membership application is at an advanced stage.

The lack of supervision of the DNFBPs sector for AML/CFT/PF indicates that no feedback or little feedback will be communicated. However, the FIA is at advanced stage of developing Directives and Guidelines for DNFBPs to facilitate their compliance with AML/CFT/CPF obligations.

To address the identified gaps in legal framework relating to the financial sector, the following actions are recommended.

Section 16 of the Insurance Act of 2019 to be reviewed to incorporate both licensing and registration in line with the FATF Recommendation 26.

BSL should develop a comprehensive inspection plan to ensure compliance and apply appropriate sanctions for violations and proffer remedial actions.

The Banking Act and Insurance Act to be amended to include fit and proper tests on shareholders, existing management staff and associates of criminals.

SLICOM to seek for membership to International Association of Insurance Supervisors (IAIS).

FIA and DNFBPs supervisors to jointly develop a comprehensive AML/CFT/CPF supervisory framework in line with the risk identified in the NRA and FATF requirements.

BSL, SLICOM and FIA to develop sanction regime that is proportionate, dissuasive and effective for non-compliance.

DNFBPs supervisors to develop risk methodology and conduct sectorial risk assessment.

FIA to renew expired MOUs and to establish new MOUs with other competent authorities to satisfy the FATF Recommendation 2.

2.4.3 Financial Sector Risk and Vulnerability Environments

The financial sector understands its ML/TF/PF risks and AML/CFT/CPF obligations. However, the commercial banks have a better understanding within the sector. The application and understanding of AML/CFT/CPF requirements are stronger and more developed in commercial banks. The level of awareness and understanding of ML/TF/PF risk and AML/CFT/CPF obligations is good amongst remittance service providers, mobile money services providers, the insurance sector and the microfinance institutions but limited in the Security sector. However, there limited or no understanding of the proliferation financing risk in the entire financial sector.

The NRA indicated the overall vulnerability and threat of the banking sector to be medium. On average the entire financial sector was rated medium. The threats and vulnerabilities of the banking sector as mentioned in the NRA report include lack of comprehensive AML/CFT/CPF legal framework, non-availability and poor enforcement of criminal sanctions, lack of available and effective entry controls, ineffective supervision procedure and practices, lack of integrity of employees, poor AML/CFT/CPF knowledge of employees, ineffectiveness of Compliance Systems, poor suspicious activity monitoring and reporting, non-availability of reliable identification infrastructure, lack of access to adequate, accurate and up-to-date Beneficial Ownership information, non-availability of independent information sources and other additional AML/CFT/CPF measures.

2.5 Law Enforcement Profile in Sierra Leone

2.5.1 Law Enforcement Agencies Operations

The principal Law Enforcement Agencies (LEAs) which are in the AML/CFT/CPF chain in Sierra Leone include Sierra Leone Police; Anti-Corruption Commission; National Drug Law Enforcement Agency and National Security and Central Intelligence Agency; National Revenue Authority and Immigration Service. Sierra Leone has legal framework that establishes the following powers and responsibilities among others for the various LEAs in line with the FATF Recommendations 30 and 31.

Legal authority to investigate predicate offences of ML/TF

Types of investigative powers available to LEAs

Sources of information and access to information

Authority to identify, trace and initiate freezing and seizing of properties
 Deployment of parallel financial investigations
 Mechanism for cooperation with counterparts at both national and international levels for information sharing and exchange
 Asset recovery and management

In addition, there are provisions for Search of persons and premises, taking witnesses and seizing and obtaining evidence. Also, the legal framework specifies the various investigative techniques available to LEAs such as Undercover Operations (Section 11, ACA; Sections 35 and 36 (1), ACA), Intercepting Communications (Sections 32 (1) and 32 (2), NDLA), Access Computer Systems (Section 37(1), NDLA and Section 70, ACA), Controlled Delivery (Section 35, NDLA; Section 99, ACA and Section 109, AML/CFT/CPF Act).

Law Enforcement Agencies in Sierra Leone have entered into agreements with various regional institutions or fora such as the INTERPOL, the West African Police Chiefs Cooperation, and the Asset Recovery Interagency Network for Wet Africa (ARINWA) to foster exchange of information that could assist the investigation of ML, TF, PF and other Financial Crimes.

Sierra Leone LEAs collaborate and cooperate with other countries especially members of the Mano River (Liberia and Guinea) regarding gathering and sharing intelligence and implementing maximum public awareness for the promotion of the fight against money laundering and countering terrorist financing.

A summary of the relevant legal framework is provided below:

Responsibilities and Powers	Relevant Legal Framework
Legal authority to investigate predicate offences of ML/TF	Section 3, Police Act Section 6(3)(c), CISA Section 3(1)(j), NDLA Section 7, ACA Section 107, AML/CFT/CPF Act
Concurrent investigation of predicate offences and Parallel financial investigation	Section 10, ACA
Involvement of several competent authorities to identify, trace and initiate freezing and seizure of properties	Sections 112; 117 and 118, AML/CFT/CPF Section 106, ACA Section 40, NDLA Section 72 (d), NDLA
Participation of other non-LEAs in financial investigation of predicates	Section 70, Custom Act

Access to all necessary documents and information	Sections 30(1); 30(4); 87(1)(c) and 124; AML/CFT/CPF Act Sections 57 (1); 57(2) and 99, ACA
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An analysis of the Effectiveness of the Sierra Leone AML/CFT/CPF system as noted in the 2nd MER review the following gaps in the extant legal framework for the LEAs.

Significant challenges in identifying ML through parallel financial investigations or crimes that generate proceeds.

Lack of Standard Operating Procedures (SOPs) creates ambiguity regarding the circumstances under which ML is comprehensively identified and investigated.

LEAs, including the Transnational Organized Crime Unit (TOCU), are yet to prioritize the identification and investigation of ML in relation to successful investigations of predicate crimes.

Lack of statistics on disseminations from the Financial Intelligence Agency (FIA), including the number received, utilized, and not utilized, along with relevant reasons.

LEAs are not prioritizing discussions on ML investigations within collaborative stakeholder platform - the Financial Crime Working Group (FCWG), which could assist in their efforts.

Lack of guidance for investigating authorities on identifying ML during investigations of proceeds-generating crimes.

Inability of LEAs to pursue ML investigations due to insufficient knowledge of the three types of ML (self; third and stand-alone).

Financial intelligence is not fully utilized to identify the types of ML activities that pose inherent risks to the financial system.

Except for the Anti-Corruption Commission (ACC), the other LEAs lack the necessary forensic expertise for effectively investigating financial and proceeds-generating crimes that lead to ML.

There is a notable shortage of investigators with specialization in ML investigations. The extent of discretion applied by judges in the adjudication of some ML/TF/PF cases was at variance with the provisions of the law. Therefore, establishing sentencing guidelines that consider the gravity of ML risks in the country is worth exploring.

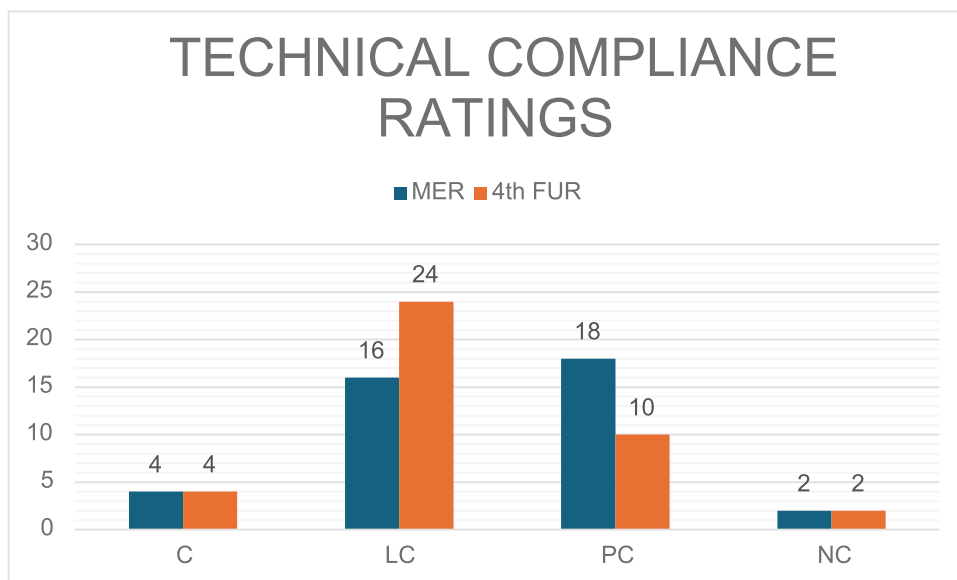
Sierra Leone does not have legal framework that permit the application of other criminal justice measures in cases where a ML investigation has been pursued but where it is not possible, for justifiable reasons, to secure a ML conviction. Though the Anti-Corruption Commission (ACC) applies a similar standard, but only in cases of predicate offences of money laundering (ML), rather than as an alternative to ML prosecution due to insufficient evidence.

2.6 Second Mutual Evaluation of Sierra Leone

2.6.1 Overview of Performance in the Mutual Evaluation

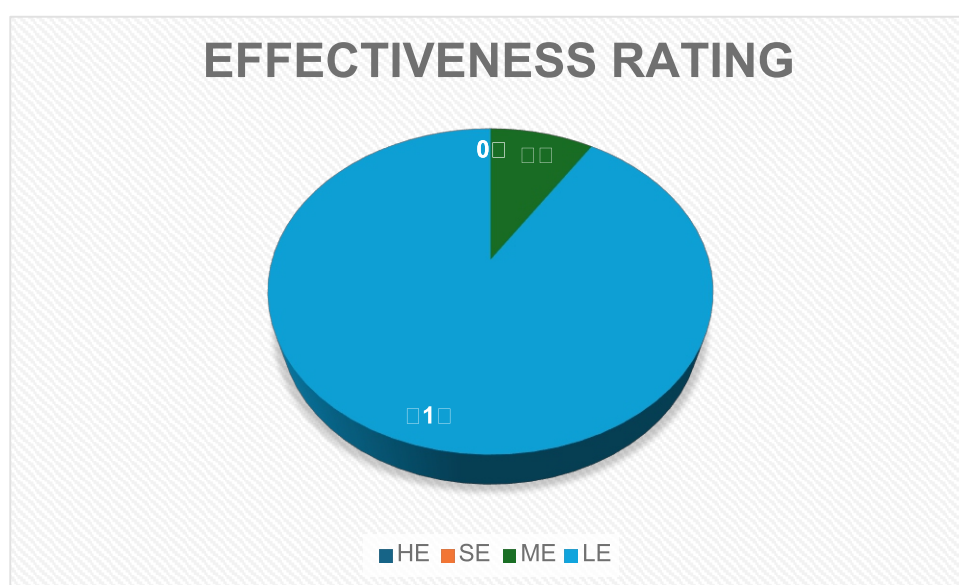
The Republic of Sierra Leone was evaluated by GIABA for the second time 2019 and its Mutual Evaluation Report (MER) adopted in 2020. The assessment covered Technical Compliance relating to the FATF 40 Recommendations and Effectiveness on AML/CFT/CPF system based on the FATF eleven (11) Immediate Outcomes. The ratings achieved by Sierra Leone in Technical Compliance in the MER adopted in December 2020 and 4th Follow-Up Report of November 2024 with upgrade re-rating in eight (8) FATF Recommended rated PC are presented in the table below.

REC	MER RATING	4 TH FUR RATING	REC	MER RATING	4 TH FUR RATING
1	LC	LC	21	C	C
2	LC	LC	22	PC	LC
3	LC	LC	23	PC	PC
4	LC	LC	24	PC	PC
5	LC	LC	25	PC	PC
6	PC	PC	26	LC	LC
7	NC	NC	27	LC	LC
8	NC	NC	28	PC	PC
9	C	C	29	LC	LC
10	PC	LC	30	LC	LC
11	C	C	31	LC	LC
12	LC	LC	32	PC	LC
13	LC	LC	33	LC	LC
14	PC	LC	34	PC	PC
15	PC	LC	35	LC	LC
16	PC	PC	36	LC	LC
17	PC	LC	37	PC	PC
18	PC	LC	38	PC	LC
19	PC	PC	39	PC	PC
20	C	C	40	LC	LC



The rating in the Immediate Outcomes did not change as the FATF Universal Procedure has not provided for re-rating. Hence, the ratings in the MER are as follows:

IO 1	IO 2	IO 3	IO 4	IO 5	IO 6	IO 7	IO 8	IO 9	IO 10	IO 11
ME	LE	LE	LE	LE	LE	LE	LE	LE	LE	LE



2.6.2 Summary of Findings of the Second Mutual Evaluation Exercise

The MER revealed the following significant deficiencies in the AML/CFT/CPF regime of Sierra Leone as at the time of on-site visit in 2019.

Inadequate resources for AML/CFT/CPF issues including for investigation and prosecution of money laundering cases, and for supervisory roles,

Low level of understanding of the outcome of the NRA among the Non-Bank financial institutions,
 STR filing not commensurate with the level of ML/TF risks particularly by non-bank reporting entities,
 Lack of regulation of identified high-risk sectors (Bureau de Change; Real Estate Agents; DPMS),
 Low level of financial investigative skills among LEAs,
 Level of ML convictions not consistent with the ML/TF/PF risk profile of the country,
 Limited level of confiscation in relation to offences generating significant amount of proceeds of crime,
 Weak framework for managing confiscated assets,
 Absence of parallel financial investigation,
 Lack of specific guidelines or SOPs or manuals on freezing and confiscation of assets,
 Limited confiscation of falsely declared and non-declared cross-border currencies and bearer negotiable instruments,
 Limited capacity to recover assets in a range of ML/TF cases and predicates consistent with the ML/TF/PF risk profile,
 Low level of awareness of obligations and implementation of TFS related to TF by NBFIs and DNFBPs,
 Lack of Effective supervision and monitoring of implementation of TFS by reporting entities,
 No legal and institutional framework or mechanism to implement TFS related to PF,
 Inadequate application of preventive measures by NBFIs and DNFBPs,
 Inability to establish Bos by NBFIs and DNFBPs as part of CDD measures,
 Lack of due diligence on an ongoing basis on existing directors, persons with beneficial interest at or above the threshold of 5%,
 Lack of necessary supervisory tools/methodologies by SLICOM and DNFBP supervisors to ascertain comprehensive information on the nature of ML/TF/PF risk facing their sectors,
 Sanctions and remedial actions by supervisors/regulators are not effective, proportionate and dissuasive, and no sanctions for AML/CFT/CPF non-compliance for the DNFBP sector,
 No ML/TF/PF risk assessment relating to different types of legal entities (persons and arrangements),
 Lack of enforcement of sanctions in Company Act against legal persons for non-compliance with information requirement,
 Lack of case management system for monitoring and managing MLA and extradition requests received or sought,
 Absence of dedicated staff with expertise to handle MLA and at the Law Office of Attorney General.

2.6.3 Major Recommended Actions in the Mutual Evaluation Report

To address the deficiencies in the AML/CFT/CPF regime of Sierra Leone, the following actions were recommended.

Development of a more comprehensive National AML/CFT/CPF Strategy/Policy based on the risk identified in the NRA taking into consideration the following:

- o The AML/CFT/CPF Strategy to be developed in consultation with all key stakeholders
- o To clearly set out actions related to preventive, supervision and enforcement actions in the short, medium and long terms
- o To establish mechanism to track the success and/or implementation of the action items

Development of and implementation of National Confiscation Strategy/Policy

Establishment of Asset Management Office or strengthening existing mechanisms

Effective implementation of risk-based AML/CFT/CPF supervisory/monitoring framework for NBFIs and DNFBPs including the following:

- o BSL and the FIA to improve RBS for the banking sector and to deepen the scope of inspection
- o SLICOM and DNFBP supervisors to adopt robust risk assessment methodology and inspections to be on risk-sensitive basis

Amendment of the AML/CFT/CPF to remove legal constraints in the application of administrative sanctions to enable supervisors to apply proportionate, dissuasive and effective sanctions for AML/CFT/CPF violations

Supervisory authorities to be adequately resourced

Establishment of mechanism for effective implementation of TFS relating to PF

Establishment of case management system in the AG's Office for effective management of MLA requests and training of personnel.

Identification of NPOs at risk of TF and conduct of Risk Assessment

Other recommended actions include:

Increase in funding for Anti-Corruption Commission to enhance its capacities for the timely and efficient disposal of corruption and corruption related cases.

Institute legal reforms to confer powers on the ACC to prevent, detect, investigate, and prosecute corruption in the private sector.

Provide adequate ICT infrastructure for use by the Cyber Security Unit at the CID and the Cyber Security Coordination Unit within the Ministry of Information and Civic Education.

Establish a working relationship between the CID and the Ministry of Information and Civic Education for a successful implementation of the cyber security system established by law.

Provide training and capacity building opportunities for law enforcement officers on cybercrime and computer related violations for effective investigations and prosecutions.

Fast-track the enactment of the counter-terrorism legislation now in the process to fully criminalize terrorism and terrorism related activities and provide for other processes in handling cases of actual or potential terrorism.

Fast-track the enactment of the Anti-money Laundering and Combating of Financing of Terrorism and proliferation Financing Bill 2023.

Review the Customs Act 2011, Act No 9 of 2011 to fully criminalize smuggling and related activities.

Introduce legal reforms to fully criminalize illegal restraint and hostage taking and provide for adequate sanctions to make it more dissuasive and legal reforms to fully criminalize sea piracy and related offences.

Fast-track the enactment of the Bill entitled THE SECURITIES AND EXCHANGE ACT 2021 that fully criminalizes insider trading and market manipulation.

Establish a division within the Law Officers Department dedicated to the prosecution of financial crimes including money laundering, terrorism financing and proliferation financing.

Establish a Financial Crimes Investigation Task Force dedicated to the investigation of financial Crime including money laundering, terrorism financing and proliferation financing.

Increase funding/support in technology and cyber security to keep pace with the increased abuse of the cyberspace for money laundering, terrorism financing, proliferation financing and other forms organized crime.

The specialized division of the High Court established by the Chief Justice for the adjudication of corruption offences should consider other financial crimes including money laundering, terrorism financing, and proliferation financing.

Designed a tailored filing system in the High Court to guarantee speed and confidentiality in the determination and disposal of cases of money laundering, terrorism financing and proliferation financing.

Allocate resources for training and capacity building for judges in the spheres of money laundering, terrorism financing and proliferation financing.

Deploy more resources in energy supplies, internet connectivity and the procurement of ICT infrastructure to enhance the capacity of allied ministries, departments, and

agencies to combat cybercrime and other forms of computer abuse to strengthen the hand of the National Revenue Authority in their effort to mobilize revenue and combat revenue related violations.

Invest more in strengthening the capacity of the Provincial and Border security Unit and establish a department within the Office of National Security for the Management of Border areas to reduce the rate of smuggling which occasions a loss of revenue.

Establish a framework for cooperation between the National Revenue Authority and the Anti-corruption Commission to effectively mobilize revenue and combat revenue related violations.

Establish a data bank for law enforcement agencies to ease access to data for the purposes of review, assessment and periodic reporting on the country's progress in combating money laundering, terrorism financing, proliferation financing and other predicate offences.

Develop a concept paper for technical Assistance by international partners to aid the operationalization of the National Implementation Plan.

Institute legal reforms to establish a specialized Unit for the preservation, management and disposal of proceeds and instrumentalities of crime.

2.7 Preparation for the Third Round of Mutual Evaluation Exercise

GIABA member States have agreed with the following Phase 1 Schedule for conducting the third round of their mutual evaluations.

MS	2ND ROUND PLENARY DISCUSSION	FOLLOW-UP CUT-OFF*	TC DUE DATE**	3RD ROUND PLENARY DISCUSSION
Ghana	May 2017	February 2024	August 2025	November 2026
Senegal	November 2018	August 2024	February 2026	May 2027
Burkina Faso	May 2019	February 2025	August 2026	November 2027
Mali	November 2019	August 2025	February 2027	May 2028

Benin	May 2021	February 2026	August 2027	November 2028
Nigeria	August 2021	February 2026	August 2027	November 2028
Niger	August 2021	August 2026	February 2028	May 2029
Cabo Verde	May 2019	February 2027	August 2028	November 2029
Sierra Leone	December 2020	February 2027	August 2028	November 2029

Source: GIABA Secretariat

Sierra Leone has demonstrated the desired commitment to addressing the gaps in its AML/CFT/CPF regime prior to undergoing the next round of mutual evaluation. Consequently, the country has taken several steps including the following:

The Financial Intelligence Agency (FIA) has been admitted to the Egmont Group of FIUs

Establishment of National Mutual Evaluation Working Group with the FIA as the Coordinator

Capacity building on AML/CFT/CPF for state prosecutors. Nonetheless, the LEAs lack the needed personnel complement in parallel financial investigation

Tremendous efforts by the Anti-Corruption Commission in recovery of stolen assets or misappropriated funds by public officials. However, ACC's is limited in scope without the mandate to investigate and prosecute corruption in the private sector.

Enactment of Cyber Security and Crime Act 2021, Act No 7 of 2021 to enable competent authorities to investigate and prosecute cybercrime and related offences

Establishment of Cybercrime Unit within the Criminal Investigations Department (CID) to handle cases of cybercrime and other form of abuse of the cyberspace.

The Ministry of Information and Civic Education has established the Cyber Security Coordination Unit with specialists dealing with issues of cyber security and other forms of computer-related violation.

Establishment of a specialized division of the High Court for the adjudication of corruption cases which has led to a dramatic increase in the number of prosecutions and convictions in corruption and corruption related cases

The recalibration of the Anti-corruption Commission as an independent entity with sufficient powers to investigate corruption and state indictments without the need for a preliminary investigation has led to a dramatic increase in the number of prosecutions, convictions, and recoveries of stolen assets.

There has been tremendous transformation of the National Revenue Authority in the areas of Technical, Financial and Human Resources, thereby increasing the capacity of the Authority to mobilize revenue and combat tax evasion and other revenue related violations. However, there is the need enhance the technical

capacity of Authority by upgrading related national infrastructure including power supply and internet connectivity.

The Justice Administration System has witnessed significant progress including the recruitment of 31 State Counsels at the Law Officers Department as well as 34 Magistrates and 43 Judges who have been deployed across all the regions of the country.

CHAPTER THREE

3.0 Strategic AML/CFT/CPF Pillars and their Key Priority/Result Areas

These are the operational backbone driving the implementation of an effective AML/CFT/CPF system. They represent major thrust areas of intervention; interaction; governance reforms including legal and institutional frameworks, and capacity building. Each Pillar will be accomplished through a series of key results areas/priorities within specified timeframe by designated stakeholders. The Strategy will be implemented through the following six (6) pillars.

3.1 Pillar 1: Strengthening Legal and Institutional Framework

Objective: This Pillar aims to ensure comprehensiveness of the legal infrastructure and the adequacy of institutional arrangements that support the implementation of an effective AML/CFT/CPF system consistent with international standards.

Key Result Areas:

Comprehensive review of AML/CFT/CPF Legal Framework: Review and amend extant laws, regulations and guidelines as well as guidance papers in line with the requirements of the FATF Standards without violating fundamental principles of domestic law; develop and enact new laws and regulations; criminalisation of the full range of predicate offences, adoption or introduction of provisions to address the supervision and operations of crypto currency and development of appropriate guidelines for the sector; address inconsistency between principal laws and operating guidelines; and also between national laws and institutional legal frameworks; removing ambiguity in sanction regime.

Institutional framework Reforms: Review mandates of all competent authorities to reduce overlap of functions thereby reducing inter-agency rivalry; establish new institutions with adequate powers and resources; streamline operational relationship among competent authorities.

Autonomy and Independence of Institutions: Strengthening institutions to make them less vulnerable to external interference in the execution of their mandates.

Impact Indicators:

Improved understanding of AML/CFT/CPF conceptual issues and requirement
Improved institutional performance
Existence of comprehensive legal and regulatory frameworks

3.2 Pillar 2: Effective and Efficient AML/CFT/CPF Regulatory and Supervisory Framework and Preventive Measures

Objective: This Pillar is designed to promote efficiency and effectiveness of supervisory actions in line with the identified ML/TF/PF risks confronting the operations of reporting entities.

Key Result Areas:

Institutionalised Risk-Based Approach: Deploy risk-based approach (RBA) for supervision of all reporting entities and for compliance obligations; resources are efficiently managed to produce the desired outcomes taking into account the ML/TF/PF risks at national, sectoral and institutional levels; conduct sectoral risk-based supervision actions and annual evaluation of high-risk sectors such as the NPOs; DPMS; Real Estate.

Effective Supervisory Oversight: Well-designed risk-based AML/CFT/CPF supervisory framework that takes into consideration the peculiarities of the reporting entities (associated ML/TF/PF risks, diversity, etc) based on available resources; supervisory actions and follow-up measures facilitate better compliance; sectoral risk-based supervision of all sectors including VASPs; application of effective, dissuasive and proportionate sanctions; development of clear methodologies and procedures for application of remedial actions; establishment of feedback between supervisors and operators, mechanism for collaboration among supervisors including joint inspections/examinations; guidance to private sector in meeting their obligations relating to Targeted Financial Sanctions (TFS) for TF and PF; digitalisation of regulatory processes to enhance identification of beneficial ownership; establishment of clear regulation for digital financial services and cybercrimes; development of guidelines for treatment of PEPs and High-Risk jurisdictions.

Capacity Building Enhancement: provision of adequate resources for AML/CFT/CPF supervision; provision of training including mentorship, attachments; study tours and outreach programs to promote peer-to-peer learning and implementation of robust AML/CFT/CPF measures.

Effective Preventive Measures: harmonization of account opening form and CDD/KYC requirements; development of AML/CFT/CPF guidelines for the DNFBP sector; establishment of Board Committees on Risk Management; introduction of Independent Directors for reporting entities; introduction of Bank Verification Numbers (BVN) to enhance CDD process; revision of Guidelines on PEPs; formation/strengthening Compliance Officers forum; revision of corporate governance codes; conduct of ML/TF/PF risk assessment by reporting entities; development of digital KYC, online reporting tools and adoption of RegTech; development of guidance for wire transfer services including travel rules; Development and issuance of guidance for the NPOs at risk of TF to address the unintended consequences of misapplication of the FATF Recommendation 8 by financial institutions.

Impact Indicators:

- Improved risk-based supervision of reporting entities especially Non-Bank Financial Institutions (NBFIs) and DNFBPs
- Enhanced understanding of risk mitigating measures
- Improved implementation of preventive measures
- Enhanced risk-based supervision of VASPs
- Improved regulatory reporting with delay relating to STRs; asset freezing; etc.

3.3 Pillar 3: Strengthening Operational Effectiveness in the fight against Money Laundering and its Predicates

Objective: This Pillar aims to ensure the effectiveness of several competent authorities in the implementation of robust AML/CFT/CPF regime.

Key Result Areas:

Effective Law Enforcement Actions: review mandates of LEAs to reduce inter-agency rivalry and improve resource optimization; strengthen investigative and prosecutorial processes; specialised training on parallel financial investigations; incentivisation to facilitate retention of competent personnel and reduce unethical practices; establishing functional whistleblowing protection programs; simplification of operational processes and procedures; deployment of modern techniques and tools; enhancing cross-border collaboration and information sharing; strengthening asset declaration system to enhance transparency and accountability in the fight against corruption; establishing regional/provincial offices to enhance local intelligence; establish National Financial Crime Coordination Committee (NFC3) as a collaborative, integrated, public-to-public model to address significant financial crime threats with focus on - policy development to advance horizontal policy and legislative solutions to enhance law enforcement capacity and expansion of knowledge and learning for enforcement and prosecutorial partners (see Canadian Model).

Modernise IT Infrastructure of the Financial Intelligence Agency: provision of modern IT systems to keep pace with rapid technological innovation relating to delivering of the financial services and products; securely deliver on its intelligence analysis and dissemination; facilitating compliance mandates in a digital landscape thereby improving business performance; promoting standardisation in reporting obligations by the reporting entities especially STR submission; facilitating membership of Egmont Group of FIUs.

Establishment of Specialised AML/CFT/CPF Unit: for a more focused approach to handling AML/CFT/CPF matters at institutional level; establishing/strengthening National Sanctions Committee.

Functional Recovered Stolen Asset Management Office: strengthen existing Asset Management Office to reduce deterioration of recovered assets in line with international best practices such as StAR Initiatives; clear procedure on sharing of benefits from recovered to agencies involved in the recovery process.

Personnel Complement and Capacity Building: holistic approach to capacity building of LEAs including Customs; Immigration as well as Attorney-General's Department; Prosecutors; Lawyers and the Judiciary on ML/TF/PF matters; improving logistics support; developing memorandums of understanding (MoUs) between Sierra Leone Bar Association (SLBA) and General Legal Counsel to promote sectoral compliance with AML/CFT/CPF obligations.

Efficient Data Collection and Management System: in-depth review of AML/CFT/CPF data collection process; provision of IT infrastructure for maintaining data; adequacy of resources for data collection and management; training on digital data collection tools; establishing centralised data dashboards; designation of dedicated unit for data collection within stakeholder institutions; establishment of data protection agency.

Risk Assessment: Periodic review National Risk Assessment to incorporate emerging ML/TF/PF risks (every 2 years or as may become urgent); conduct standalone National PF risk assessment; conduct risk assessment for the NPO sector and other thematic areas such as the petroleum sector.

Impact Indicators:

Improved level of successful investigation and prosecution of ML/TF/PF cases
Enhanced cooperation, coordination and collaboration among competent authorities
Improved level of expertise on AML/CFT/CPF matters
Improved data collection and management processes
Enhanced timely access to AML/CFT/CPF databases
Improved quality of STRs
Enhanced understanding of the NPO sector especially NPOs at risk of TF abuse.

3.4 Pillar 4: Enhancing National Coordination and International Cooperation

Objective: This Pillar is designed to facilitate inclusiveness in policy design and implementation, exchange of information at both national and international levels.

Key Result Areas

3.4.1 National Coordination

Effective Inter-Agency Platform: strengthening platform for dialogue among stakeholders; use of working groups and taskforces to address specific ML/TF/PF cases; reinforcing coordination mechanisms; developing options for enhancing information sharing; strengthening IMC at both operational and policy levels.

Effective Communication of Policies and Programs: ensuring effective communication of changes to legal framework and the FATF Standards as well as outcomes of risks assessment to the industry and the public.

Effective Public-Private Collaboration: expanding public-private collaboration to improve efficiency and effectiveness of AML/CFT/CPF system; enhanced focus on results-driven policy; establishing shared priorities; enhancing information sharing between the public and private sector; leveraging technology to increase automation of processes.

Establishment of Joint Intelligence Task Force: adoption of international best practice strategic platform for public-private partnership (PPP) to foster trust, secure collaboration, facilitate intelligence-led decision-making, and to create a robust defence mechanism to combat financial crimes at scale (see UK, Jersey, Australia, Singapore, India and South Africa models).

Adequate preparation for 3rd Round of Mutual Evaluation: establish National Mutual Evaluation Team including Strategic Working Groups aligned with the Immediate Outcomes (IOs) and Operational Working Groups for specific areas; conduct regular training on mutual evaluation process to facilitate good understanding of the FATF Standards and its methodology, and the GIABA Mutual Evaluation Process & Procedure; establish data collection protocols including timelines and development of templates; ensuring completion of major recommended actions from the 2nd MER before the follow-up exit date of February 2027; collecting and reviewing relevant documents; regular briefing and stakeholder engagements at both policy and operational levels; conduct, where possible, micro/mock/self-evaluation to ascertain level of preparedness.

3.4.2 International Cooperation

Effective Management of MLA and Extradition Issues: establishing a dedicated Unit at the Law Office to manage MLA and extradition requests; establishing effective case management system particularly on collection of statistics;

developing Standard Operating Procedures (SOPs) and guidelines for prioritizing requests; adoption of proactive approach in handling MLA requests.

Efficient Information Sharing Platform: availability of appropriate procedures and legal framework to facilitate both formal and informal exchange of information especially on spontaneous basis at both horizontal and diagonal basis (between supervisors, between law enforcement agencies or between non-counterparts); exploring mechanisms that would facilitate more rapid access to information; leveraging structured international and regional platforms for information sharing.

Impact Indicators:

Existence of structured engagement on policy development
Enhanced coordination and robust mechanism for combating ML/TF/PF
Improved ownership of AML/CFT/CPF programs by various stakeholders
Increased number of Memorandums of Understanding (MoUs) between Sierra Leone and other jurisdictions
Increased statistics on MLA requests both inbounds and outbounds
Improved deployment of case management platform in MLA matters.

3.5 Pillar 5: Enhancing Beneficial Ownership for Legal Persons and Legal Arrangements

Objective: This Pillar is designed to facilitate transparency and timely access to adequate, accurate and up-to-date Beneficial Ownership (BO) Information relating to Legal Persons (LPs) and Legal Arrangements (LAs).

Key Result Areas:

Centralisation of BO Information: developing central digital registry linking registries and databases of different holders of information (Company Registry; NPOs; Voluntary Organisations; Land Registries; etc.)

Risk Assessment of Beneficial Ownership: complete the assessment of ML/TF/PF risk associated with LPs and LAs.

Effective Sanctions Regime: ensuring that legal and/or natural persons are subject to effective, proportionate and dissuasive sanctions for failure to keep adequate and accurate BO information; enforcement of reporting obligations on BO.

Availability and Access to BO Information: including accurate and up-to-date basic and BO information; ensuring timely access to BO information by relevant competent authorities; exploring new ways of securing BO information.

Impact Indicators:

Enhanced adequate, accurate and up-to-date BO Information
Increased access to BO information by competent authorities

Reduction in corruption and illicit financial flows (IFFs)
Enhanced traceability and detection of financial crimes

3.6 Pillar 6: Strengthen Capacity and Awareness Raising Programs

Objective: This Pillar aims to ensure that all relevant stakeholders are provided with quality and relevant capacity building, and to promote the desired awareness of AML/CFT/CPF requirements

Key Result Areas:

Development of Holistic Capacity Building Programs: identification of AML/CFT/CPF training needs across the public and private sectors; design and delivery of appropriate training programs to array of stakeholders at macro, meso and micro levels; assessment of the impact of capacity building; organising structured community education programs.

Awareness Raising on AML/CFT/CPF Matters: organisation of awareness programs for all stakeholder including policy makers, non-state actors such as the youths, civil society, academia, the media, religious leaders, market women, etc; conduct outreach programs to Financial Institutions including VASPs, DNFBPs, and NPOs to ensure better understanding of ML/TF/PF risks; establishing community-based risk monitoring and feedback mechanism to improve early detection and prevention of illicit activities; improving use of social media in creating awareness about the consequences of ML/TF/PF and AML/CFT/CPF obligations.

Enhancing Financial Inclusion: promote financial inclusion policy; widening participants in the formal sector; strengthening diaspora engagement thereby attracting diaspora capital to boost domestic revenue mobilisation for national development in line with African Union Agenda 2063; facilitating innovative product design; facilitating dialogue between supervisory bodies and professional associations.

Impact Indicators:

Improved level of understanding of AML/CFT/CPF issues
Improved ownership of AML/CFT/CPF obligations
Increased availability and usage of innovative financial products and services
Increased participation in the formal financial system

CHAPTER FOUR

4.0 Coordination Mechanism

Effective implementation of any strategy requires robust and adaptive coordination process to provide synergy among the stakeholders. It helps to avoid overlap and duplication of actions thus preventing resource wastages. Good coordination facilitates responsiveness at institutional, national and regional contexts with respect to AML/CFT/CPF obligations. It involves the designation of lead institution or mechanism at both operational and policy levels and facilitates maintenance of coherence and alignment of actions with overall national AML/CFT/CPF priorities. Thus, the coordination of the implementation of this strategy is a multi-pronged approach as follows:

4.1 Advisory Board

The overall coordination of the implementation of this strategy shall rest on the Advisory Board (AB) chaired by the Honourable Minister of Finance. The Advisory Board shall ensure the availability of adequate resources for the implementation of the priorities in the strategy. The Advisory Board shall consider progress reports received from time to time from the FIA. The Advisory Board may meet once every six (6) months or at any other intervals it may deem necessary for the effective implementation of the Strategic Plan.

4.2 Financial Intelligence Agency

The FIA shall serve as the National Coordinator of the AML/CFT/CPF Strategy and report to the Advisory Board. It shall be responsible for implementation oversight, stakeholder engagements, coordination of technical support, and advocacy. The FIA shall receive regular progress reports (every six months) from other competent authorities and the reporting entities and prepare consolidated reports for the Advisory Board's consideration. The FIA shall organise regular review meetings of institutional coordinators.

4.3 Competent Authorities and Reporting Entities

The primary implementers of the strategy are the various competent authorities/national public institutions and the private sector (reporting entities). Each stakeholder institution will be required to designate a focal point who is of considerable higher position to coordinate the implementation of the strategy across their institutions. The focal point shall liaise with the FIA and prepare progress report. Each stakeholder institution shall integrate the priorities of the strategy into their operational framework.

4.4 Non-State Actors

The non-state actors especially the media and civil society organisations shall play critical role in ensuring effective follow-up on the implementation of the priorities in the strategy. They shall be required to raise alarm where implementations are lagging.

4.5 Development and Technical Partners

The implementation of the strategy will require support (both the technical and financial) from development partners. The FIA shall ensure coordinated approach to the delivery of all forms of supports from partners to prevent fragmentation and ensure efficiency. A partnership mapping shall be conducted to streamline areas of intervention to avoid duplication of efforts. The strategic partners shall include inter-alia the FATF, ECOWAS, GIABA, Egmont Group, African Union, AfDB, IMF, World Bank, UNDP, UNODC, Transparency International, Mano River Authority, ARINWA. The partnership can be on bilateral, multi-lateral or sectoral basis. Irrespective of the nature of partnership, the FIA shall be informed.

CHAPTER FIVE

5.0 Monitoring and Evaluation

Monitoring and evaluation (M& E) will be undertaken in line with strategic Results-Based Management (RBM) framework as the Action Plan (to be annexure 1 to this strategy) with performance indicators. There shall be a dedicated unit within the FIA responsible for M&E functions. The unit will be charged with producing periodic progress reports for submission and presentation by the Director General or the representative to the Advisory Board.

Each stakeholder institution shall establish an AML/CFT/CPF Observatory for tracking progress and produce reports accordingly.

In reporting periodic progress on implementation of the Strategy, each institution will deploy automated dashboard indicating the level of progress ascribed to each action taken using the following description.

Level	Status of Achievement	Action (s) Required for Improvement
	Fully Achieved	Sustain implementation
	Largely Achieved	Follow up with outstanding actions without delay
	Moderately Achieved	Review outstanding actions and re-prioritise resources for effectiveness
	Insignificantly Achieved	Conduct holistic review of implementation plan Undertake stakeholder engagement
	Not Achieved at all	Re-assess emerging risks Undertake stakeholder engagement Re-prioritise actions

Independent evaluations will be conducted at mid-term (2027) and end-term (2029) respectively. The Advisory Board may establish a Risk and Mitigation Taskforce to address risks that could impair the implementation of the Strategic Plan

Where significant events emerge during the implementation of the strategy, then the Strategic Plan and the risk profile can be reviewed on ad hoc basis to incorporate the emerging trends and risks for the purpose of developing appropriate mitigation measures.

At either the mid-term or end-term evaluation, the process could deploy the ED4SP² (Entity Design for Sustainable Performance) Principle that seeks to reduce the negative impacts and improve development performance.

² ED4SP is copyright work by Dr. Lucy S. Newman in her book African Leaders' Tete a Tete: Navigating Entity Design and Prioritization for Systemic Outcomes, Pyxidia House Publishers Dallas Texas, USA, 2022

The copyrighted schematic for ED4SP is presented as follows:



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The components of the ED4SP principle as explained by the author are as follows:

The Mandate: This is what the entity seeks to achieve, what it represents and whom it is set to serve

The Strategy: This is How the entity plans to go about attaining its mandate and to what end.

The Structure: Describes How the entity arranges the various roles within the entity in pursuit of the mandate and Strategy. It also identifies the relationships that exist between the various bodies that make up the whole.

Policies: This considers the various provisions within which the entity will operate. It identifies the processes required to attain the defined objectives; what rules exist to guide how these processes are carried out at the various levels within the structure as defined.

Platforms: This relates to the level of engagement for application, storage, retrieval, dissemination, and disclosures to stakeholders within and externally.

People: This identifies the type of people required to work within the entity's various roles as defined in the structure. How will they be selected, placed, monitored, and eliminated or rewarded?

Culture: This is the social contract that exists within the entity on how the entity engages people at various levels and how should those whom the entity serves expect to be served.

Systemic or Institutional Risk and Capacity Assessment: What are the issues that can compromise the attainment of the entity's mandate? How can they be identified, measured, and nipped in the bud?

CHAPTER SIX

6.0 Risks and Mitigation Measures

The Sierra Leone National AML/CFT/CPF Strategy is a multi-dimensional Strategy that comes with its own specific risks. Hence, the need to anticipate and identify potential risks in advance and then outline possible mitigation measures to address them to increase the probability of success of the Strategy.

In particular, the following risks in addition to others, will be of primary concern.

S/N	Risk Type	Elements of Risk	Proposed Mitigating Measures
1.	Lack of Political Will	Lack of ownership due to wrong perception about AML/CFT/CPF measures and resistance from powerful interest groups Interference with operations of certain competent authorities Deliberate inadequacy of resources for AML/CFT/CPF matters due to non-alignment with national priorities	High-Level advocacy by GIABA at instance of AB/FIA Transparency and emphasis on meritocracy in leadership recruitment of institutions Direct budget for AML/CFT/CPF issues by the Parliament Regular high-level stakeholder engagement (meetings; colloquiums; etc.) Regular participation of AML/CFT/CPF line ministers at GIABA Statutory meetings.
2.	Capacity Constraints	Limited knowledge about AML/CFT/CPF issues across stakeholder institutions Capacity deficit arising from lack of personnel in terms of quality and quantity in both the public and private sectors	Holistic capacity building leveraging partners supports Deployment of technology in capacity building to facilitate fast-track learning and operational effectiveness Adoption of best practices such as mentorship, attachment, study tour and other peer learning platforms

			Appropriately sequencing and scalability of reforms in line with existing capacity Increased incentives to attract and retain qualified talents in the public sector.
3.	Impact of Disruptive Times (BANI)	Rapid changes to the FATF Standards Inability to catch up with technological innovations Ingenuity of criminals Delays in enactment of revised or new legal framework Emergence of other international requirements from other jurisdictions	Adoption of non-parliamentary approach to revision of legal framework especially use of OEMs Involvement of Parliament in AML/CFT/CPF matters Capacity building in IT related matters Establishment of joint taskforces to facilitate coordination and information sharing
4.	Impact of ESG on implementation	Wrong perception of formalisation of the informal sector as punitive to small businesses Lack of responsible business conduct (RBC) by businesses both public and private sectors Lack of social justice in treatment of corruption cases Lack of equity in application of rules and regulations Non-alignment of business activities with the needs of the society Inter-generational misalignment in governance	Strong communication strategy articulating the benefits of reforms Regular engagement in policy design to facilitate ownership and trust Involvement of youths in design and implementation of national programs Enforcement of due diligence in business conducts Establishment of whistleblowing protection programs Adherence to legal and regulatory requirements Adoption of best practices in leadership Promotion of ethics and integrity in governance

			Undertake corporate social responsibility and sustainability Promote sound compliance management practices Ensure effective financial governance and accountability Establish Risk Assessment and Management framework and internal control programs Mainstreaming reform initiative into business operations Balancing innovation with ethical responsibility
5.	Coordination Misalignment or failure	Dereliction of roles and responsibilities by key stakeholders Poor communication between the stakeholders and the national coordinating agency Overlapping of mandates of competent authorities Silo approach to implementation	Clear terms of reference for each coordinating platform Regular follow-up meetings between the FIA and network of focal points and Strategy Observatories Establishment of digital dashboards to track progress Incentivise coordination to facilitate commitment and effectiveness
6.	Weak Governance	Lack of proper oversight Use of personnel with little or no authority as contact points	Use of high-level personnel as contact points Deployment of adaptive mechanism to keep the strategy on track

Each risk and their corresponding mitigation measures will be incorporated into a Risk Register maintained by the designated coordination process (FIA) in collaboration with the institutional focal points.

CHAPTER SEVEN

7.0 Conclusion

The Sierra Leone National AML/CFT/CPF Strategic Plan 2025-2029 is a paradigm shift in the implementation of AML/CFT/CPF measures in the country. It ushers in a new thinking for addressing identified gaps in the AML/CFT/CPF system, and how to mitigate emerging ML/TF/PF risks. The Strategy provides the needed focus on prioritisation of limited resources for implementing AML/CFT/CPF measures. It also laid out the foundational rationale for change with respect to implementing an effective AML/CFT/CPF system.

The Strategy has taken cognisance of the capacity of stakeholders in the AML/CFT/CPF value chain in Sierra Leone and thus has developed proactive actions required to facilitate ownership of the implementation of the Plan. The Strategy is anchored on integrated and interrelated six strategic pillars with corresponding action plan to ensure that progress can be measured.

It is therefore important to note that the success of the Strategy is a function of the following: High-Level Political Commitment; Alignment of National Policies with institutional mandates and discipline; availability and efficient deployment of the limited resources for the intended purposes; continuous investment in capacity building at both human and institutional levels; and the integrity of the monitoring and evaluation programs.

Effective implementation of the Strategy will enable Sierra Leone to guard against international sanctions applied on countries with weak AML/CFT/CPF system. Such sanctions include grey listing by the FATF ICRG program that calls on other countries of the world to apply enhanced measures in relating with a country that is not compliance with international AML/CFT/CPF Standards. The attendant implications of such sanctions include:

- Reputational damage to country at international level as country could be labelled high-risk jurisdiction.
- Risk to correspondent banking relationships, particularly involving US Dollar businesses, thus leading to de-risking.
- More scrutiny of international transactions, delays and more questions/documentations and denial of use of international financial products such as use of domestic debit cards for international transactions.
- Higher transaction costs.
- Increasing risk that existing relationships will be cancelled, for fear of reputational contagion.
- Low attraction of Foreign Direct Investments

- Citizens of the country are subjected to rigorous security checks/scrutiny for visa; at point of entry/exit and for business relationship.

Thus, the implementation of the Strategy is envisaged as a collective responsibility and shared national priority driven by ownership and sincerity of purpose by all stakeholders. In addition, development partners will be expected to play facilitating roles in every segment of the Strategy including risk-sharing. The Strategy should therefore not be seen as a one-off reform program but a catalyst for continuous learning, engagement and adoption of measures to address evolving practices in the global AML/CFT/CPF landscape.

CHAPTER EIGHT

8.0 Appendices

The two major annexures to the Strategy are as follows.

8.1 Action Plan (Template – Annexure 1)

This consists of the logical framework for implementing the Strategy. For each key result area in the respective strategic Pillar, it specifies the Activities/Guide to Action; timelines; responsibility and expected outcome.

8.2 Outcome Framework (Template – Annexure 2)

Provides a complete picture of how the measures of success are verified, sources of verification and likely assumptions/risks for each Key Result Area (KRA) under each pillar.

LIST OF ACRONYMS

AB	-	Advisory Board
ACC	-	Anti-Corruption Commission
AfDB	-	African Development Bank
AG	-	Attorney General
AML	-	Anti-Money Laundering
ARINWA	-	Asset Recovery Interagency Network for West Africa
BANI	-	Bristle, Anxious, Non-Linear and Incomprehensible
BO	-	Beneficial Ownership
BSL	-	Bank of Sierra Leone
BVN	-	Bank Verification Number
C	-	Compliant (Fully)
CAGR	-	Compound Annual Growth Rate
CDD	-	Customer Due Diligence
CFT	-	Countering the Financing of Terrorism
CID	-	Criminal Investigation Department
CPF	-	Countering Proliferation Financing
DNFBP	-	Designated Non-Financial Businesses and Professions
DPMS	-	Dealers in Precious Metal and Stones
ECOWAS	-	Economic Community of West African States
FATF	-	Financial Action Task Force
FCWG	-	Financial Crime Working Group
FIA	-	Financial Intelligence Agency
FIU	-	Financial Intelligence Unit
FUR	-	Follow-Up Report
GDP	-	Gross Domestic Product
GIABA	-	Intergovernmental Action Group against Money Laundering in West Africa

HE	-	High Effectiveness
IAIS	-	International Association of Insurance Supervisors
ICRG	-	International Cooperation Review Group
IFF	-	Illicit Financial Flow
IMC	-	Inter-Ministerial Committee
INGO	-	International Non-Governmental Organisation
IO	-	Immediate Outcome
IT	-	Information Technology
KRA	-	Key Result Area
KYC	-	Know Your Customer
LA	-	Legal Arrangement
LC	-	Largely Compliant
LE	-	Low Effectiveness
LEA	-	Law Enforcement Agency
LIC	-	Low Income Country
LP	-	Legal Person
M&E	-	Monitoring and Evaluation
ME	-	Moderate Effectiveness
ME	-	Mutual Evaluation
MER	-	Mutual Evaluation Report
ML	-	Money Laundering
MLA	-	Mutual Legal Assistance
MoU	-	Memorandum of Understanding
NBFI	-	Non-Bank Financial Institution
NC	-	Non-Compliant
NDLEA	-	National Drug Law Enforcement Agency
NFC3	-	National Financial Crime Coordination Centre
NPO	-	Non-Profit Organisation
NRA	-	National Risk Assessment

OEM	-	Other Enforceable Means
PC	-	Partially Compliant
PEP	-	Politically Exposed Person
PF	-	Proliferation Financing
PPP	-	Public-Private Partnership
RA	-	Recommended Action
RBA	-	Risk-Based Approach
RBM	-	Results Based Management
RegTech	-	Regulatory Technology
SDG	-	Sustainable Development Goal
SE	-	Substantial Effectiveness
SLBA	-	Sierra Leone Bar Association
SLICOM	-	Sierra Leone Insurance Commission
SOP	-	Standard Operating Procedures
StAR	-	Stolen Asset Recovery
STR	-	Suspicious Transaction Report
TC	-	Technical Compliance
TF	-	Terrorist Financing
TFS	-	Targeted Financial Sanctions
TOCU	-	Transnational Organised Crime Unit
UBO	-	Ultimate Beneficial Owner
UK	-	United Kingdom
UNDP	-	United Nations Development Program
UNODC	-	United Nations Office for Drug Control
US	-	United States
VA	-	Virtual Asset
VASP	-	Virtual Asset Service Provider

ANNEXURE 1:

ACTION PLAN – RESULTS MANAGEMENT FRAMEWORK

Pillar 1: Strengthening Legal and Institutional Framework				
Objective: This Pillar aims to ensure comprehensiveness of the legal infrastructure and the adequacy of institutional arrangement that support the implementation of an effective AML/CFT/CPF system consistent with international standards.				
KEY RESULT AREA	ACTIVITY/GUIDE FOR ACTION	TIMELINE	RESPONSIBILITY	MEASURES OF SUCCESS (OUTCOMES)
1.1: Comprehensive review of AML/CFT/CPF Legal Framework: Review and amend extant laws, regulations and guidelines as well as guidance papers in line with the requirements of the FATF Standards without violating fundamental principles of domestic law; develop and enact new laws and regulations; criminalisation of the full range of predicate offences, adoption or introduction of provisions to address the operations of crypto currency and development of appropriate guidelines; address inconsistency between principal laws and operating guidelines; and also between national laws and	Amend National Drug Control Act – List of controlled substances in the Schedule to include new and emerging psychoactive substances. Also expand the scope/mandate of the Agency to include rehabilitation and reintegration	Q4:2026	NDLEA (Lead); AG/MoJ; SLP; FIA;	All amended legislations are in force and effect All relevant legislations meet the requirements of the FATF Standards Enhanced regulation of Virtual Assets (VAs) and Virtual Asset Service Providers (VASPs) Secondary legislations consistent with primary legislations Enhanced regulation of Financial Institutions Existence of appropriate Guideline and directives for enhanced effectiveness of the AML/CFT/CPF regime
	Amend Registration of Business Act to incorporate Beneficial Ownership	Q4:2026	NIB (Lead); AG/MoJ; FIA	
	Amend Communication Authority Act to provide clarification on regulation of digital financial services and joint supervision by NatCA and BSL	Q2: 2027	NatCA and BSL (Co-Lead); AG/MoJ; FIA; Operators	
	Amend Investment Board Act Section 34 to capture declaration by Beneficial Owners.	Q3: 2027	NIB (Lead); AG/MoJ; FIA	

institutional legal framework; unambiguous sanction regime;	Revise Directives and Guidelines for Financial Institutions in line with the provisions of the AML/CFT/CPF Act, and include a practical advisory guide on the prevention of ML/TF/PF. Also to include the establishment of Board-Level Risk Committees and the appointment of Independent Directors	Q1: 2026	FIA (Lead); BSL, SLICOM; Operators	Enhanced AML/CFT/CPF compliance by reporting entities Well streamlined Sanction regimes and enhanced enforceability Effective regulation of DNFBP sector Well-regulated NPO sector to avoid unintended consequences of de-risking by financial institutions.
	Revise Directives and Guidelines for Mobile Money Service Operators in line with the provisions of the AML/CFT/CPF Act, and include a practical advisory guide on the prevention of ML/TF/PF.	Q2: 2026	FIA (Lead); BSL, NatCA; Operators	
	Develop guidelines for the implementation of Targeted Financial Sanctions related to Proliferation Financing.	Q2: 2026	FIA (Lead); Primary Supervisors, Reporting Entities; CISA	
	Develop an AML/CFT/CPF Risk Assessment Framework which includes risk assessment relating to proliferation financing.	Q1:2027	FIA (Lead); BSL; ONS; FISU; CISA	
	Amend Pharmacy and Drug Act to harmonize with the National Drug Control Act relating to	Q4: 2027	AG/MoJ (Lead); MoH; FIA, NDLEA	

1.2: Institutional framework <i>Reforms:</i> Review mandates of all competent authorities to reduce overlap of functions thereby reducing inter-agency rivalry; establish new institutions with adequate powers and resources; streamline operational relational among competent authorities.	general provisions and to clarify enforcement roles.			
	Develop sector-specific directives and guidelines for NPOs to include a thorough background check of possible funding partners/donors to deter those likely to be involved in illicit activities, including terrorist financing.	Q4: 2026	MoPED/NGO Department (Lead); FIA; SLANGO; NPOs	
	Revise the AML/CFT/CPF Guideline and Administrative Sanctions/Penalties for the DNFBP sector, along with any possible sector-specific directives and guidelines following a sectoral risk assessment. (Real Estate; Casinos; Lawyers; DPMS; etc.)	Q4: 2026	Sector Primary Regulators and FIA (Co-Leads); Stakeholders within the Sectors	
	Develop specific SoPs for Law Enforcement Agencies/Competent Authorities for Investigation and Prosecutions (SLP; ACC; CISA; NDLEA) Develop a SoP framework for the effective implementation of the Currency Declaration (CDR) regime	Q4: 2027 Q4: 2026	AG/MoJ (Lead); LEAs; FIA; CAs FIA, NRA (Co-Leads); SLP; BSL; FISU	LEAs have operational SoP and mandates well delineated Elimination of inter-agency rivalry Mechanism for TFS operational Well-regulated NPO sector

	Establish National Sanctions Committee on TFS	Q1: 2028	AG/MoJ (Lead); MoF; MFA; FIA	Coordinated intelligence gathering framework Recovered assets well managed and put to developmental use BSL well focused on Risk-Based Approach to supervision and compliance by reporting entities Increase in enforcement actions due to improved coordination
	Establish Regulatory Agency for NPOs	Q4: 2027	MoPED/NGO Department (Lead); AG/MoJ; FIA; SLANGO; NPOs	
	Establish Department of Compliance at Bank of Sierra Leone	Q1: 2028	BSL (Lead); FIA; MoF	
	Create Self-Regulatory Bodies for High-Risk DNFBPs	Q4: 2027	DNFBP Operators (Lead); AG/MoJ; FIA; BSL	
1.3: Autonomy and Independence of Institutions: Strengthening institutions to make them less vulnerable to external interference in the execution of their mandates	Direct budget allocation to the FIA	Every Q1 of successive year	FIA (Lead); Parliament; MoF; BSL	Provision of timely and quality intelligence by FIA to Competent Authorities Improved performance of Competent Authorities with respect to the investigation and prosecution of financial crime cases Reduction in failed prosecution cases
	Direct budget allocation to Competent Authorities	Every Q1 of successive year	FIA (Lead); Parliament; MoF; BSL	
	Develop a strategic Plan for the FIA	Q1: 2026	FIA (Lead) , Advisory Board	

	Develop a sustainable and long-term resourcing model for the FIA and stakeholders within the National AML/CFT/CPF Regime	Q1: 2026	FIA (Co-Lead); MoF; AG/MoJ	
	Review and develop administrative, internal control and procedures policies for the FIA.	Q4: 2026 and Ongoing	FIA (Lead);	

Pillar 2: Effective and Efficient AML/CFT/CPF Regulatory and Supervisory Framework				
Objective: This Pillar is designed to promote efficiency and effectiveness of supervisory actions in line with the identified ML/TF/PF risks confronting the operations of reporting entities.				
KEY RESULT AREA	ACTIVITY/GUIDE FOR ACTION	TIMELINE	RESPONSIBILITY	MEASURES OF SUCCESS (OUTCOMES)
2.1: Institutionalise Application of Risk-Based Approach: Deploy RBA for supervision of all reporting entities and for compliance obligations; resources are efficiently managed to produce the desired outcomes;	Develop and issue RBA supervisory guidelines for different categories of reporting entities (banks, NBFIs, DNFBPs, VASPs etc.)	Q3: 2026	FIA (Lead); Primary Supervisors	Well-focused RBA Supervisory programs Reduction in supervisory resource wastage, increase in awareness and understanding of RBA across entities, Enhanced detection of high-risk activities Timely submission and quality of Suspicious Transaction Reports (STRs). Better understanding of emerging ML/TF/PF risks thereby facilitating coordinated
	Develop and share institutional/sectorial risk assessment methodology for reporting entities (Banks, NBFIs, DNFBPs, etc.).	Q3: 2026	Primary Supervisors (Lead); FIA; Reporting Entities	
	Update existing National Risk Assessment	Q4: 2027	FIA (Lead); other stakeholders	
	Conduct Thematic Risk Assessment and Sectoral risk assessments to identify and prioritize ML/TF/PF threats	Q1:2026 and Continuous	Primary Supervisors (Lead); FIA; Reporting Entities	
	Implement tailored compliance expectations based on risk classification (high, medium, low)	Continuous	FIA (Lead); Primary Supervisors	
	Conduct national research studies and develop strategic products on emerging risks and trends in ML/TF/PF	Continuous (At least twice every year)	FIA (Lead); other stakeholders	

	Train supervisory staff and reporting entities on RBA principles and operational application	Continuous (At twice once every year)	FIA (Lead); other primary supervisors; Reporting Entities	approach to combat and mitigate those risks
	Establish periodic review mechanisms to adjust supervisory programs based on evolving ML/TF/PF risks	Q1: 2027 and Ongoing	BSL (Lead); FIA; other primary supervisors; Reporting Entities	
	Integrate RBA into supervisory tools (onsite inspections, targeted inspection, offsite monitoring,)	Q3: 2026	BSL (Lead); FIA other Primary supervisors	
	Review and update sectoral supervisory policies based on identified ML/TF/PF risks, and develop risk-based supervision manuals, including regular training for supervisors.	Q3: 2026	Primary Supervisors and FIA (Co-Lead); MoF; AG/MoJ	
2.2: Effective Supervisory Oversight: Well-designed supervisory framework to address the needs of reporting entities; supervisory actions and follow-up measures facilitate better compliance; coverage of all sectors including VASPs; application of effective, dissuasive and proportionate sanctions; development of clear methodologies and procedures for application of remedial actions; establishment of feedback between supervisors and operators, mechanism for collaboration among supervisors including joint inspections/examinations; support	Implement structured compliance follow-up protocols and organize periodic outreach and awareness programs for reporting entities.	Continuous	Primary Supervisors and FIA (Co-Lead); MoF; AG/MoJ	Increased reporting of high quality STRs and decline in violations and delayed filings. Enhanced Coverage of sectors under regular supervision and Inclusion of new sectors (VASPs, fintech). Enhanced compliance level due to application of effective, dissuasive and proportionate
	Develop and Issue tailored guidelines and directives for virtual asset and virtual asset service providers and develop supervisory mapping of newly emerging sectors	Q2: 2026	BSL (Lead); FIA; other Primary Supervisors	

to private sector in meeting their obligations relating to Targeted Financial Sanctions (TFS) for TF and PF; digitalise regulatory processes to enhance identification of beneficial ownership; establish clear regulation for digital financial services and cybercrimes.	Establish effective, dissuasive and proportionate sanction procedures with clear escalation paths and publish enforcement outcomes to promote transparency and compliance by reporting entities.	Q1: 2027	FIA (Lead); BSL; Other Primary Supervisors	sanctions and resolution of infractions through remedial action. Increase in joint inspections and improved inter-agency collaboration and feedback exchanges. Increased use of digital regulatory platforms and reduction in manual data errors. Adoption of digital financial regulations and decrease in cybercrime incidents linked to financial activity Reduction in Bank fraud and identity theft Streamlined financial processes
	Design feedback templates for post-supervisory visits and create joint inspection teams across supervisory bodies.	Q2: 2026	BSL and FIA (Co-Lead); FIA and Other Primary Supervisors	
	Develop and issue guidance policies and procedures on Targeted Financial Sanctions (TFS) and develop tools to help the private sector screen names and monitor entities.	Q3: 2026	FIA (Lead); BSL; other Primary Supervisors; Reporting Entities	
	Launch centralized digital platform for reporting and beneficial ownership tracking and enable secure e-inspection modules and develop beneficial ownership regulations for disclosures, registry maintenance and accessibility.	Q2: 2027	NIB and FIA (Co-Lead); BSL; Other Primary Supervisors	
	Conduct VASP oversight and sector mapping with Sanctions protocols and Feedback mechanism	Q1: 2027	BSL and FIA (Co-Lead); Other Primary Supervisors	

	Launch Bank Verification Number (BVN) and Standardise Account Opening Form to enhance CDD measures and facilitate harmonisation of customer information across banks	Q4: 2026	BSL (Lead); FIA; Operators.	and customer onboarding Easy detection of blacklisted or designated customers.
2.3: Capacity Building Enhancement: Provision of adequate resources for AML/CFT/CPF supervision; provision of training including mentorship, attachments; study tours and outreach programs to promote implementation of robust AML/CFT/CPF measures.	Conduct Training Workshops for Supervisors, Reporting Entities, Law Enforcement Agencies, Intelligence Institutions and other stakeholders on AML/CFT/CPF measures, risk-based supervision, and typologies.	Continuous	FIA (Lead); Other Primary Supervisors; LEAs; Reporting Entities.	Increased Number of Trained Supervisors with certification or accreditation on AML/CFT/CPF issues.
	Develop Mentorship Programmes for staff with little or no experience on AML/CFT/CPF matters.	Continuous	FIA and BSL (Co-Lead); Other Primary Supervisors; Reporting Entities	Improved Quality of Supervision Reports reflecting risk-based approaches.
	Organize Study Tours to countries with advanced AML/CFT/CPF regimes for knowledge sharing especially on emerging issues.	Continuous	FIA (Lead); Other Primary Supervisors; LEAs; Reporting Entities	Reduction in Compliance Gaps among reporting entities.
	Facilitate Attachments to partner Financial Intelligence Units (FIUs), or international bodies (e.g. FATF, Egmont, GIABA).	Q4: 2026	FIA (Lead); Other Primary Supervisors; LEAs; Reporting Entities	Integration of AML/CFT/CPF Modules into national training curricula.
	Launch Outreach Campaigns targeting DNFBPs and VASPs to raise awareness of AML/CFT/CPF obligations.	Continuous	FIA (Lead); Primary Supervisors; Reporting Entities	Improved Ratings in Mutual Evaluations

2.4: Effective Preventive Measures: Harmonization of account opening form and CDD/KYC requirements; development of AML/CFT/CPF guidelines for the DNFBP sector; Establishment of Board Committees on Risk Management; Introduction of Independent Directors; Introduction of Bank Verification Numbers to enhance CDD process; Revision of Guidelines for PEPs; formation/strengthening Compliance Officers forum; revision of corporate governance codes; conduct of ML/TF/PF risk assessment by reporting entities	Develop E-learning Modules for continuous professional development on AML/CFT/CPF issues.	Continuous	FIA (Lead); Primary Supervisors; Industry Practitioners	Increased number of statutory reports received from FIs/DNFBPs. Consultative development and approval of the form, and the implementation and feedback by reporting entities. Documentation of the specific money laundering (ML), terrorist financing (TF), and proliferation financing (PF) risks the institution faces and the design of a proportionate and
	Establish Technical Assistance Partnerships Framework on how to collaborate effectively with regional and international development partners and organizations.	Q1: 2026	FIA (Lead); Development Partners	
	Establish mechanisms within FIs and DNFBPs for the progressive statutory obligation of filing Currency Transaction Reports (CTRs), Foreign Transaction Reports (FTRs), and Suspicious Transaction Reports (STRs) during the onboarding stage and during the business relationship.	Q2: 2026	FIA (Lead); Other Primary Supervisors; LEAs; Reporting Entities.	
	Develop ML/TF/PF typologies on emerging trends of financial crime activities with red flags and indicators and roll-out to Reporting Entities to enhance their detection and reporting of STRs	Continuous	FIA (Lead); Other Primary Supervisors; LEAs; Reporting Entities.	
	Develop a comprehensive single customer onboarding form for reporting entities for consistency and compliance with documentation requirements.	Q2: 2026	FIA (Lead); Other Primary Supervisors; Reporting Entities.	

	Reporting entities to establish independent directors different from executive and non-executive directors, responsible for providing independent opinion of AML/CFT/CPF compliance requirements.	Q4: 2026	Sector/Industry Associations/SRBs (Lead); FIA ; Other Primary Supervisors; Reporting Entities.	effective compliance program to mitigate those risks. Reduced regulatory enforcement actions, fines, or sanctions specifically related to the management of PEPs or high-risk customers. Increase in the number of key decisions and risk-based actions that are formally documented as direct outcomes of these forums. Formal adoption and publication of a revised governance code that explicitly enumerates the Board of Directors' and Senior Management's specific accountability for the effectiveness of
	Reporting entities to conduct institutional risk assessment.	Continuous	Sector/Industry Associations/SRBs (Lead); FIA ; Other Primary Supervisors; Reporting Entities.	
	Launch Bank Verification Number (BVN) system by all banks to easily trace customers information within the banking industry.	Q3: 2027	BSL (Lead); FIA; MoF	
	Develop and issue guidelines on PEPs and other high-risk customers to apply EDD	Q4: 2026		
	Ensure that compliance forums are strengthened and their formation immensely assists in implementing AML/CFT/CPF compliance standards within the FIs/DNFBPs sectors.	Q2: 2027	Sector/Industry Associations/SRBs (Lead); FIA ; Other Primary Supervisors; Reporting Entities.	

					the AML/CFT/CPF program
	Review the corporate governance code to incorporate additional responsibilities for AML/CFT/CPF compliance requirements.	Q4: 2027	NIB (Lead); AG/Moj; FIA		

Pillar 3: Strengthening Operational Effectiveness in the fight against Money Laundering and its Predicates

Objective: This Pillar aims to ensure the effectiveness of several competent authorities in the implementation of robust AML/CFT/CPF regime.

KEY RESULT AREA	ACTIVITY/GUIDE FOR ACTION	TIMELINE	RESPONSIBILITY	MEASURES OF SUCCESS (OUTCOMES)
3.1: Effective Law Enforcement Actions: Review mandates of LEAs to reduce inter-agency rivalry and improve resource optimization; strengthen investigative and prosecutorial processes; specialised training on parallel financial investigations; incentivisation to facilitate retention of competent personnel and reduce unethical practices; establishing functional whistleblowing protection programs; simplification of operational processes and procedures; deployment of modern techniques and tools; enhancing cross-border collaboration and information sharing; strengthening asset declaration system to enhance transparency and accountability in the fight against corruption; establishing regional/provincial offices to enhance local intelligence;	Review existing mandates to identify areas of overlap, conflict, or inefficiency that contribute to inter-agency rivalry.	Q4: 2026	AG/MoJ (Lead); Ministry of Internal Affairs; SLP; FIA; ACC; ONS; CISA; LEAs and CAs	Improved level of successful investigation and prosecution of ML/TF/PF cases Enhanced cooperation, coordination and collaboration among competent authorities Improved level of expertise on AML/CFT/CPF matters Improved quality of STRs Enhanced understanding of the NPO sector especially NPOs at risk of TF abuse in terms of
	Implement SOPs to guide investigations and prosecutions, ensuring clarity and consistency in processes.	Q1: 2026	AG/MoJ (Lead); Ministry of Internal Affairs; SLP; FIA; ACC; ONS; CISA; LEAs and CAs	
	Train LEAs to conduct parallel financial investigations alongside predicate offenses	Continuous	SLP and ACC (Co-Leads); FIA, AG/MoJ, CISA; ONS; CISA; LEAs and CAs	
	Develop clear policies that outline the rights of whistleblowers, reporting processes, and protections against retaliation, and	Q1: 2028	AG/MoJ (Lead); ONS; CISA; SLP; FIA; ACC; LEAs and CAs	

operationalise the Financial Crimes Working Group (FCWG) as a collaborative, integrated, public-to-public model to address significant financial crime threats with focus on - policy development to advance horizontal policy and legislative solutions to enhance law enforcement capacity and expansion of knowledge and learning for enforcement and prosecutorial partners.	encourage internal reporting within institutions.			classification and determination of threat level.
	Acquisition of modern/digital and technologies that enhance operational efficiency and effectiveness, followed by their implementation.	Q1: 2027	MoF (Lead); AG/MoJ; SLP; FIA; ACC; LEAs and CAs	
	Create a digital platform that facilitates collaboration and efficient sharing of Currency Declaration Reports (CDRs) between all stakeholders	Q3:2027	FIA and NRA/Customs (Co-Leads); SLP; BSL; FISU	
	Decentralisation / Regionalisation to enhance local intelligence and enforcement;	Continuous	ONS (Lead); FIA; SLP; NRA ;CISA; ACC;LEAs and CAs	
	Implementation of the operationalized FCWG Structure and Governance to Strengthen National Cooperation, Coordination and Collaboration among Stakeholders in the AML/CFT/CPF system.	Q4: 2026	FIA(lead); AML/CFT/CPF stakeholders	
	Develop an ICT Modernisation Strategy to keep pace with rapid technological innovation relating to delivering financial services and products to mitigate risks of illicit finance;	Q1: 2026	FIA (lead); MoF, Primary Supervisors, Reporting Entities.	Quality intelligence produced and disseminated by the FIA, as
3.2: Modernise ICT Infrastructure of the Financial Intelligence Agency: Modern ICT systems to keep pace with rapid technological innovation relating to delivering of the financial services and products;				

securely deliver on its intelligence analysis and dissemination; facilitating compliance mandates in a digital landscape thereby improving business performance; promoting standardisation in reporting obligations by the reporting entities; facilitating information sharing with other members of Egmont Group of FIUs.	Deployment and periodic upgrade of GoAML, and provision of advanced technological tools to enhance the Tactical, Operational and Strategic Analysis capabilities of the Agency	Q1: 2026 and Continuous	FIA (lead); MoF,	acknowledged by recipient agencies Enhanced investigation of ML/TF/PF-related cases Improved and robust information sharing platform
	Framework and tools for monitoring financial flows through the National Payment Switch	Q2:2026	FIA (Lead), BSL, MoF	
	Upgrade the FIA official website to feature an interactive hub that presents the global and regional AML/CFT/CPF contemporary activities alongside the FIA's own national efforts through reports, statistics, and related accomplishments.	Q1: 2026 and Continuous	FIA (Lead)	
	Deploy new compliance management systems that automate and enhance compliance tracking and reporting to improve business performance	Q4: 2027	FIA (lead), MoF, Primary Supervisors, Reporting Entities.	
	Procure new IT equipment and upgrade infrastructure to support Tactical, Operational and Strategic Analyses of financial intelligence.	Q2: 2026	FIA (Lead); MoF	
3.3: Establishment of Specialised AML/CFT/CPF Unit: For a more focused approach to	Establish dedicated and functional AML/CFT/CPF units at each stakeholder institution with detailed framework that defines	Q2: 2027	FIA (lead), BSL; other Primary Supervisors; LEAs;	Improved understanding of AML/CFT/CPF requirement

handling AML/CFT/CPF matters at institutional level	the unit's structure and operational procedures for a more focused approach to handling AML/CFT/CPF matters at institutional level.		Reporting Entities; NPOs	Improved ownership of AML/CFT/CPF matters aligned with national priorities
3.4: Functional Recovered Stolen Asset Management Office: Establish an Asset Management Office to reduce deterioration of recovered assets in line with international best practices such as StAR Initiatives; clear procedure on sharing of benefits from recovered to agencies involved in the recovery process.	Establish an Assets Recovery and Management Office.	Q1: 2027	AG/MoJ (Lead); MoFA/IC; MoF, FIA; SLP; NRA ;CISA; ACC;LEAs; CAs	Reduction in wastages and deterioration of recovered assets
	Develop a robust framework that aligns with StAR Initiatives, outlining processes for the effective management of recovered frozen or confiscated assets.	Q2: 2027	AG/MoJ (Lead); MoFA/IC; MoF, FIA; SLP; NRA ;CISA; ACC;LEAs; CAs	Reduction in corruption Reduction in illicit financial flows Enhanced effectiveness of LEAs in
	Create a detailed procedure that outlines how recovered benefits will be shared, including criteria and relevant percentages in line with FATF R 38.	Q3: 2027	AG/MoJ (Lead); MoFA/IC; MoF, FIA; SLP; NRA ;CISA; ACC;LEAs; CAs	identification, tracing and investigation of proceeds of crime
	Develop National Policy on how to utilize recovered assets for economic development	Q4: 2027	AG/MoJ (Lead); MoFA/IC; MoF, FIA; SLP; NRA ;CISA; ACC;LEAs; CAs	
3.5: Personnel Complement and Capacity Building: Holistic approach to capacity building of LEAs including Customs; Immigration as well as Attorney-General's Department; Prosecutors; Lawyers and the	Recruit highly qualified nationals into the LEAs; Cas; AGs Office; Customs; Judiciary; Immigration	Continuous	AG/MoJ (Lead); MoFA/IC; MoF, FIA; SLP; NRA ;CISA; ACC;LEAs ; CAs	Improved investigation of ML/TF/PF cases with priority of types of money laundering
	Create tailored AML/CFT/CPF training programs that address the unique requirements of each	Q1: 2027	FIA (lead);ACC;SLP AG/MoJ; CISA;	

Judiciary on ML/TF/PF matters; improving logistics support; developing MoUs between SLBA and General Legal Counsel to promote sectoral compliance with AML/CFT/CPF obligations.	agency such as training on Parallel Financial Investigations for LEAs; Declaration System for Customs; Reporting Obligations by Legal professionals.		Judiciary; GLC; SLBA; CAs; LEAs	Enhanced Border control and management Reduction in cases of movement of currency and Bearer Negotiable Instruments across borders Improved reporting obligations
	Training of Lawyers on AML/CFT/CPF issues	Q2: 2026 and Continuous	FIA and AG/MoJ (Co-Lead); SLBA; GLC	
	Develop MoUs that clearly define compliance responsibilities and collaborative efforts between the two entities, to promote sectoral compliance with AML/CFT/CPF obligations.	Q4: 2026	FIA and AG/MoJ (Co-Lead); SLBA; GLC	
3.6: Efficient Data Collection System: In-depth review of AML/CFT/CPF data collection process; provision of IT infrastructure for maintaining data; adequacy of resources for data collection and management; training on digital data collection tools; establishing centralised data dashboards; designation of dedicated unit for data collection within stakeholder institutions.	Review the existing AML/CFT/CPF data collection methodologies to identify inefficiencies and areas for enhancement in line with FATF R 33	Q4: 2026	FIA (lead), Primary Supervisors, CAs; LEAs, Reporting Entities, NPOs	Improved data collection and management processes Enhanced timely access to AML/CFT/CPF databases Well managed data privacy related matters
	Develop IT Infrastructure for maintaining statistics/data in line with FATF R 33	Q3: 2027	FIA (lead); Primary Supervisors; LEAs	
	Create a strategic plan to allocate and optimize resources, ensuring	Q1: 2027	FIA (lead); Primary Supervisors; LEAs	

	adequate support for effective data collection and management.			
	Create Data Protection Agency with enabling powers to ensure compliance of reporting entities data privacy of customers	Q2: 2027	AG/MoJ (lead); FIA; ACC;SLP AG/MoJ; ONS; CISA; Judiciary; GLC; SLBA; CAs; LEAs	
	Organize workshops on effective use of digital data collection tools.	Q1: 2027	FIA (lead); Primary Supervisors; LEAs; CAs	
	Create and implement centralized dashboards that integrate data for easy access and improved management.	Q3: 2027	FIA (lead), Primary Supervisors, CAs; LEAs, Reporting Entities, NPOs	

Pillar 4: Enhancing National Coordination and International Cooperation				
Objective: This Pillar is designed to facilitate inclusiveness policy design and implementation, exchange of information at both national and international levels				
KEY RESULT AREA	ACTIVITY/GUIDE FOR ACTION	TIMELINE	RESPONSIBILITY	MEASURES OF SUCCESS (OUTCOMES)
4.1: Effective Inter-Agency Platform: Strengthening platform for dialogue among stakeholders; use of working groups and taskforces to address specific ML/TF/PF cases; reinforcing coordination mechanisms; developing options for enhancing information sharing; strengthening the Advisory Board at both and operational and policy levels.	Organise regular forums for stakeholders to discuss progress, challenges, and updates on collaborative efforts.	Continuous	FIA (lead); ONS; ACC; SLP; CISA; Primary Supervisors, CAs; LEAs, Reporting Entities, NPOs	Existence of structured engagement on policy development Enhanced coordination and robust mechanism for combating ML/TF/PF Improved ownership of AML/CFT/CPF programs by various stakeholders Number of Memorandums of Understanding (MoUs) between Sierra Leone and other jurisdictions Increased statistics on MLA requests both inbounds and outbounds Improved deployment of case management platform in MLA matters.
	Focused working groups to address specific ML/TF/PF issues, ensuring diverse representation and clear objectives.	Continuous (At least once every quarter)	FIA (lead); ONS; ACC; SLP; CISA; Primary Supervisors, CAs; LEAs, Reporting Entities, NPOs	
	Develop and implement a refined framework to enhance stakeholder communication and collaboration.	Q1: 2027	FIA (lead), Primary Supervisors, CAs; LEAs, Reporting Entities, NPOs	
	Conduct Research and develop best practices, innovative solutions and develop a	Continuous (At least once every year)	FIA (lead); ONS; ACC; SLP; CISA; Primary Supervisors, CAs;	

4.2: Effective Communication of Policies and Programs: Ensuring effective communication of changes to legislative frameworks and the FATF Standards as well as outcomes of risks assessment to the industry and the general public	proposal to enhance information sharing effectiveness.		LEAs, Reporting Entities, NPOs	
	Implement targeted strategies to strengthen Advisory board fostering better collaboration and decision-making.	Continuous	MoF and FIA (Co-lead), other line ministries of . the Advisory Board	
	Create a policy outlining how changes in legal frameworks, FATF Standards, Call for treatment of High-Risk jurisdiction, and risk assessment outcomes will be communicated to stakeholders and the general public.	Continuous	FIA (lead); ONS; ACC; SLP; CISA; Primary Supervisors, CAs; LEAs, Reporting Entities, NPOs	Better understanding of emerging AML/CF/CPF issues
4.3: Effective Public-Private Collaboration: Expanding public-private collaboration to improve efficiency and effectiveness of AML/CF/CPF system; enhanced focus on results-driven policy; establishing shared priorities; enhancing information sharing between the public and private	Develop a national Communication Strategy for dissemination of AML/CF/CPF related matters such as outcomes of NRA, Guidance and Best Papers; Research Typologies results to stakeholders	Q3: 2026	FIA (lead); ONS; ACC; SLP; CISA; Primary Supervisors, CAs; LEAs, Reporting Entities, NPOs	Well-structured communication process
	Develop a Public-Private Partnership Framework incorporating international best practices to guide operations.	Q1: 2026	FIA and Private Sector (Co-Leads); ONS; ACC; SLP; CISA; Primary Supervisors, CAs; LEAs, Reporting Entities, NPOs	Enhanced coordination and robust mechanism for combating ML/TF/PF Improved ownership of AML/CFT/CPF programs by various stakeholders
	Identify and initiate engagement with key stakeholders from both	Continuous	FIA (lead); ONS; ACC; SLP; CISA;	

sector; leveraging technology to increase automation of processes	public and private sectors to discuss collaboration opportunities.		Primary Supervisors, CAs; LEAs, Reporting Entities, NPOs	
	Organize workshops to engage stakeholders in identifying and agreeing on shared priorities for policy development.	Continuous	FIA (lead), Primary Supervisors, Reporting Entities	
	Design and roll out protocols that standardize and enhance the flow of information between the two sectors.	Continuous	FIA (lead), Primary Supervisors, Reporting Entities	
	Deploy selected automation solutions and measure their impact on process efficiency and time savings.	Continuous	FIA (lead), MoF	
4.4: Establish Collaboration Platforms: Adoption of international best practices for the various platforms to foster trust, secure collaboration, facilitate intelligence-led decision-making, and create a robust defence mechanism to combat financial crimes at scale.	Implement the comprehensive framework for regular PPP Roundtable Stakeholder engagements.	Q4: 2026	FIA (lead); ONS; ACC; SLP; CISA; Primary Supervisors, CAs; LEAs, Reporting Entities, NPOs	Enhanced collaboration between Public and Private in responding to complex ML/TF/PF threats Enriched National Risk and Threat Assessments Adaptive AML/CFT/CPF resilience due to continuous feedback Well organised intelligence sharing platform thereby
	Operationalize the Financial Crimes Working Group and create sector-specific committees.	Q4: 2026	FIA (lead); ONS; ACC; SLP; CISA; Primary Supervisors, CAs; LEAs, Reporting Entities, NPOs	

	Operationalize the Supervisors forum with a monitoring mechanism for the implementation of the institutional and policy frameworks (RBA and Directives/Guideliens) to address emerging risks	Q4: 2026	FIA (lead); Advisory Board members and members of the ME Committee	facilitating better informed investigations Improved quality and utility of STRs
4.5: Adequate preparation for 3rd Round of Mutual Evaluation: Establish National Mutual Evaluation Team including Strategic Working Groups aligned with the Immediate Outcomes (IOs) and Operational Working Groups for specific areas; conduct regular training on mutual evaluation process to facilitate good understanding of the FATF Standards and its methodology; the GIABA Mutual Evaluation Process & Procedure; establish data collection protocols including timelines and development of templates; ensuring completion of major recommended actions from the 2 nd MER before the follow-up exit date of February 2027; Assembling and reviewing relevant documents; regular briefing and stakeholder engagements at both policy and operational levels;	Establish and Train the National Co-Ordination Committee for preparation towards the Third-Round Mutual Evaluation Process.	Q2: 2026	FIA (lead); Advisory Board members and members of the ME Committee	Better understanding of the ME process and obligations of various stakeholders/parties Availability of comprehensive AML/CFT/CPF to justify compliance with the FATF Standards Better performance at the 3 rd round of ME
	Develop strategic working groups focused on Immediate Outcomes, along with operational groups addressing specific evaluation areas.	Q3: 2026	FIA (lead); Advisory Board members and members of the ME Committee	
	Organize and deliver training sessions to ensure wide participation and engagement from relevant stakeholders.	Q4: 2027	FIA (lead); Advisory Board members and members of the ME Committee	
	Create standardized protocols and templates to streamline the data collection process.	Q1: 2027	FIA (lead); Advisory Board members and members of the ME Committee	
	Create detailed action plans for each Result Area (Immediate Outcome), including clear timelines and accountability.	Q1: 2027	FIA (lead); Advisory Board members and	

conduct, where possible, micro/mock/self-evaluation.				members of the ME Committee	
	Determine the necessary documents for review, and summarise key findings and noting any gaps or areas needing further action	Q4: 2026		FIA (lead); Advisory Board members and members of the ME Committee	
	Organize and facilitate regular briefings to keep stakeholders informed and engaged at both policy and operational levels.	Continuous		FIA (lead); Advisory Board members and members of the ME Committee	
	Organize training on Mutual Evaluation process for stakeholders and follow-up on the outcome of the training	Continuous		FIA (lead); Advisory Board members and members of the ME Committee	
4.6: Effective Management of Mutual Legal Assistance (MLA) and Extradition Issues: Establishing dedicated Unit at the Law Office to manage MLA and extradition requests; establishing effective case management system particularly on collection of statistics; developing Standard Operating Procedures (SOPs) and guidelines for prioritizing requests; adoption of proactive approach in handling MLA requests.	Outline the organizational structure of the dedicated unit, specifying roles and responsibilities for effective management of MLA and extradition requests.	Q4: 2026		AG/MoJ (Lead); MoFA/IC;ONS; CISA; SLP; FIA; ACC; LEAs and CAs	Increased number of Memorandums of Understanding (MoUs) between Sierra Leone and other jurisdictions Increased statistics on MLA requests both inbounds and outbounds Improved deployment of case management platform in MLA matters.
	Create and roll out a new case management system that includes robust features for collecting and analyzing case statistics.	Q1: 2027		AG/MoJ (Lead); MoFA/IC;ONS; CISA; SLP; FIA; ACC; LEAs and CAs	
	Develop and implement standard operating procedures for managing MLA and	Q1: 2027		AG/MoJ (Lead); MoFA/IC;ONS; CISA; SLP; FIA;	

4.7: Efficient Information Sharing Platform: Availability of appropriate procedures and legal framework to facilitate both formal and informal exchange of information especially on spontaneous basis at both horizontal and diagonal basis (between supervisors, between law enforcement agencies or between non-counterparts); exploring mechanisms that would facilitate more rapid access to information; leveraging structured international and regional platforms for information sharing.	extradition requests to ensure efficiency and compliance.		ACC; LEAs and CAs	
	Create clear guidelines that emphasize proactive strategies for effectively managing MLA requests.	Q1: 2027	AG/MoJ (Lead); MoFA/IC;ONS; CISA; SLP; FIA; ACC; LEAs and CAs	
	Create new procedures that support the informal exchange of information while complying with legal standards.	Q4: 2026	AG/MoJ (Lead); MoFA/IC;ONS; CISA; SLP; FIA; ACC; LEAs and CAs	Increased number of Memorandums of Understanding (MoUs) between Sierra Leone and other jurisdictions Greater access to information Improved International Cooperation Better representation at international fora
	Create mechanisms that could facilitate quicker access to information.	Q4: 2026	AG/MoJ (Lead); Mol; MoFA/IC;ONS; CISA; SLP; FIA; ACC; LEAs and CAs	
	Seek membership of International Association of Insurance Supervisors (IAIS) by SLICOM	Q4: 2026	SLICOM (Lead); AG/MoJ; Mol; MoFA/IC; FIA	
	Initiate discussions and establish partnerships with organizations such as regional law enforcement agencies and international bodies to promote collaborative efforts in information sharing.	Q1:2028	FIA (Lead); AG/MoJ; Mol; MoFA/IC;ONS; CISA; SLP; FIA; ACC; LEAs and CAs	

Pillar 5: Enhancing Beneficial Ownership for Legal Persons and Legal Arrangements					
Objective: This Pillar is designed to facilitate transparency in access and update of Beneficial Ownership (BO) Information relating to Legal Persons (LPs) and Legal Arrangements (LAs).					
KEY RESULT AREA	ACTIVITY/GUIDE FOR ACTION	TIMELINE	RESPONSIBILITY	MEASURES OF SUCCESS (OUTCOMES)	
5.1: Centralisation of Information: Developing central digital registry linking registries and databases of different holders of information (Company Registry; NPOs; Voluntary Organisations; Land Registries; etc.)	Develop comprehensive registry and databases of legal persons and legal arrangements	Q4: 2026	NIB (Lead); AG/MoJ; FIA; BSL; Reporting Entities	Unified BO Platform accessible to users Section 2 & 14 of the Right to Access Information of 2013	
	Linking functional registries across key agencies	Q3:2027	NIB (Lead); AG/MoJ; FIA; BSL; Reporting Entities		
5.2: Risk Assessment of Beneficial Ownership: Complete the assessment of the risk associated with LPs and LAs.	Conduct National Risk Assessment on Beneficial Ownership (BO)/Legal Persons and legal arrangement)	Q4: 2026	FIA (Lead); NIB; AG/MoJ; BSL; Reporting Entities	Improve understanding of ML/TF/PF risk associated with BO/legal persons and legal arrangement	
	Develop Sector-specific BO risk profiles	Q1:2027	FIA (Lead); NIB; AG/MoJ; BSL; Reporting Entities		
5.3: Effective Sanction Regime: Ensuring that any legal or natural persons are subject to effective, proportionate and dissuasive sanctions for failure to keep adequate and accurate BO information.	Develop and issue Legal Sanctions Framework for BO (including legal person and legal arrangement)	Q2: 2027	FIA and AG/MoJ (Co-Lead); NIB; Law Reform Commission; BSL; Reporting Entities	Enhance transparency in the activities of legal persons and legal arrangement Increasing number of enforcement actions for BO breaches	

					Reduction in corruption and illicit financial flows (IFFs)
5.4: Availability and Access to BO Information: Including accurate and up-to-date basic and BO information; ensuring timely access to BO information by relevant competent authorities; exploring new ways of securing BO information	Installation of digital tools to enhance security and access of BO information by competent authorities	Q2:2027	NIB (Lead); FIA; BSL; Relevant MDAs.	Enhanced timely access to adequate, accurate and up-to-date BO information. Enhanced traceability and detection of financial crimes	

Pillar 6: Strengthen Capacity and Awareness Raising Programs

Objective: This Pillar aims to ensure that all relevant stakeholders are provided with quality and relevant capacity building and to promote the desired awareness of AML/CFT/CPF requirements

KEY RESULT AREA	ACTIVITY/GUIDE FOR ACTION	TIMELINE	RESPONSIBILITY	MEASURES OF SUCCESS (OUTCOMES)
6.1: Development of Holistic Capacity Building Programs: identification of AML/CFT/CPF training needs across the public and private sectors; and Non State Actors design and deliver appropriate training programs to array of stakeholders at macro, meso and micro levels; assessment of the impact of capacity building; organising structured community education programs.	Needs Assessment, conduct surveys, interviews, and stakeholder consultations to determine specific training gaps and priority areas in AML/CFT/CPF across sectors.	Q1: 2026 and Continuous	FIA (Lead); Primary Supervisors; LEAs; Reporting Entities; Non-State Actors; Law Reform Training School, Involve Universities, Professional Associations, e-learning providers for sustainability	Existence of stock of knowledgeable personnel on AML/CFT/CPF issues Evidence of certification programs, curriculum integration, and compliance score improvements Better understanding of AML/CFT/CPF obligations. Improved Compliance with AML/CFT/CPF requirements. Reflected in higher conviction rates, faster case handling,
	Conduct training on AML/CFT/CPF compliance requirements for FIs, DNFBPs, VASPs. and NPOs. Use modular approaches (in-person, online, simulations).	Q2: 2026 and Continuous	FIA (Lead); Primary Supervisors; LEAs;	
	Conduct detail trainings and workshops on BO information disclosures and other business registration requirements.	Q2: 2026 and Continuous	FIA (Lead); Primary Supervisors; CAC, LEAs; Reporting Entities;	

	Organised workshops and seminars for primary supervisors, investigators, prosecutors and other relevant stakeholders to capacitate them on their respective roles and responsibilities as provided as provided by the AML/CFT/CPF regime. Develop cross-agency training modules to reduce silos.	Q2: 2026 and Ongoing	FIA (Lead); Primary Supervisors; LEAs; Reporting Entities;	stronger inter-agency cooperation. Structured AML/CFT/CPF learning pathways. Evidenced by accredited courses, certification, and regular updates.
	Develop curriculum tailored to stakeholders (macro-level: policymakers, meso-level: regulators, micro-level: reporting institutions). Ensure the policymakers are enlighten to the need to have a robust AML/CFT/CPF policies or regulations. Regulator to conduct awareness training on the policies requirements to ensure compliance. Integrate into universities, professional bodies, CPD programs.	Q2: 2026 and Continuous	FIA (Lead); Primary Supervisors; LEAs; Reporting Entities; Academia.	
	Organize workshops, seminars, local capacity mobilization, e-learning modules, and simulations tailored to varying roles and responsibilities for public and private stakeholders and non-state actors	Q3: 2026 and Continuous	FIA (Lead); Primary Supervisors; LEAs; Reporting Entities; Non-State Actors; Academia.	
	Community Education and awareness Campaigns, launch	Q4:2026 and Continuous	FIA (Lead); Primary Supervisors; LEAs;	

	outreach programs, information sharing sessions in local languages, Sign Languages or Brille. radio/TV spots, and youth engagement activities. Focus on building public awareness. Educate learning institutions, Civil societies, religious houses and scholars the informal sector (Market women, Car dealers, Bike Riders, Motor Drivers Union, Mobile Companies, Petroleum, etc.), on how NPOs are used to execute terrorist activities.		Reporting Entities; Non-State Actors; Academia; Media	
	Monitoring & Evaluation (M&E) Baseline before training; Impact Assessment, develop pre- and post-training evaluation tools, measure knowledge retention and behaviour change. Establish real-time dashboards, scorecards, independent reviews.	Q3: 2027 and Continuous	FIA (Lead); Primary Supervisors; LEAs; Reporting Entities; Non-State Actors; Academia;	
	Capacity building on emerging ML/TF/PF risks such as cybercrime, misuse of virtual assets, and other technology-related offenses.	Q2: 2026 ongoing	FIA (Lead); Primary Supervisors; LEAs; Reporting Entities; Non-State Actors; Academia;	

6.2: Awareness Raising on AML/CFT/CPF Matters: Organisation of awareness programs for all stakeholder including policy makers, non-state actors such as the youths, civil society, academia, the media, religious leaders, market women, etc; conduct outreach programs to Financial Institutions, DNFBPs, and NPOs to ensure better understanding of ML/TF/PF risks; establishing community-based risk monitoring and feedback mechanism to improve early detection and prevention of illicit activities; improving use of social media in creating awareness about consequences of ML/TF/PF and AML/CFT/CPF obligations	Develop a Comprehensive Awareness Strategy for disseminating messages for different stakeholders and themes (e.g., youth, civil society, financial institutions, financial inclusion, Ponzi Scheme, Online businesses, VASPs).	Q1: 2026 and Continuous	FIA & MoICE(Co-Lead) ; Primary Supervisors, Media, CSOs, Community Leaders; Religious Groups and Academia; youth and women's groups; grassroots networks.	Increased Stakeholder Engagement and knowledge, measurable by a survey to determine the increment) Improved Awareness Levels about AML/CFT/CPF requirements. Enhanced ownership and alignment of AML/CFT/CPF matters with national developmental priorities.
	Organize National Awareness Forums and Regional Workshops. Conduct Outreach to Financial Institutions, DNFBPs, VASPs and NPOs.	Q2: 2026 and Continuous	FIA (Lead); Primary Supervisors; Media; Reporting Entities; Non-state Actors; diaspora councils; grassroots leaders.	
	Launch Social Media Awareness Campaigns and establish Community-Based Risk Monitoring Mechanisms. Form local committees to identify suspicious activities and report them. Vehicle, banners and flyers sanitation/ sensitization (across all levels) in remote areas, dissemination through radio, TV, social media platforms.	Q3: 2026 and Continuous	FIA (Lead); Ministry of Communication; Non-State Actors; Media; CSOs, and youth leaders.	
	Promote and support National Financial Inclusion Initiatives	Q3: 2026 and Continuous	BSL and FIA (Co-Lead); Primary Supervisors; Fintechs; diaspora associations; SME groups.	
6.3: Enhancing Financial Inclusion: Promote financial inclusion policy; widening participants in the formal sector; strengthening diaspora engagement thereby attracting diaspora capital to boost domestic				Increase in formal financial accounts Significant increase in the volume of diaspora

revenue mobilisation for national development in line with African Union Agenda 2063; facilitating innovative product design; facilitating dialogue between supervisory bodies and professional associations.	Organize national financial inclusion forums involving stakeholders like fintech firms, banks, diaspora groups, and SMEs	Q4: 2026 and Continuous	BSL and FIA (Co-Lead); Primary Supervisors, MFA; Ministry of Communication.	investments into development Reduction in misuse of the informal sector for illicit financial flows Awareness levels increase as measured by public surveys and media engagement metrics. Improved confidence in national programs by Diaspora population Increase in compliant digital registration.
	Launch public awareness campaigns through radio, social media, and community outreach on the benefits of formal financial participation.	Q2: 2026 and Continuous	BSL and FIA (Co-Lead); Media;	
	Design incentive programs for unbanked populations and informal sector participants to transition into the formal economy. Tie to financial literacy and SME inclusion.	Q1: 2027 and Continuous	BSL and FIA (Co-Lead); other Primary Supervisors; Reporting Entities	
	Facilitate periodic stakeholder dialogues to review business regulations, foster partnerships, and strengthen compliance culture and coordination.	Q2: 2027 and Continuous	BSL and FIA (Co-Lead); Media;	
	Facilitate online business registration with clarity on tax payment requirements and other compliance measures	Q2: 2026 and Ongoing	NIB and NRA (Lead), FIA; Media;	

ANNEXURE 2:

OUTCOME FRAMEWORK

Pillar 1: Strengthening Legal and Institutional Framework			
Key Result Area	Verifiable Indicators	Sources of Verification	Assumptions/Risks
1.1 Comprehensive review of AML/CFT/CPF Legal Framework: Review and amend extant laws, regulations and guidelines as well as guidance papers in line with the requirements of the FATF Standards without violating fundamental principles of domestic law; develop and enact new laws and regulations; criminalisation of the full range of predicate offences, adoption or introduction of provisions to address the operations of crypto currency and development of appropriate guidelines; address inconsistency between principal laws and operating guidelines; and also between national laws and institutional legal framework; removing ambiguity in sanction regime.	Number of legislations amended (reviewed and updated) within the specified timeframe (At least five laws by 2027) Number of New legislations passed/enacted (eg. On VASPs; BO; Sanctions within the specified timeframe (At least each year for 2026 – 2028) Number of guidelines and directives revised and re-issued Number of new guidelines and directives issued by appropriate competent authority. Harmonization of legal frameworks across agencies (target: 80% by 2027)	Copies of the amended legislation Copies of new legislation passed Copies of revised guidelines and directives Copies of new guidelines and directives developed and issued by the appropriate competent authority.	All stakeholders are fully committed No delays by the National Parliament in passing the legislation Competent Authorities have the capacity to develop and issue guidelines and directives

1.2: Institutional framework Reforms: Review mandates of all competent authorities to reduce overlap of functions, thereby reducing inter-agency rivalry; establish new institutions with adequate powers and resources; streamline operational relationships among competent authorities.	Number of new relevant and functional institutions established Number of SoPs developed and operational Institutional mandates reviewed and streamlined (target: all relevant agencies by 2026) Inter-agency MOUs signed to clarify roles National coordination framework fully operational (target: by 2026) % increase in enforcement actions due to improved coordination (target: 40% increase by 2029)	Copies of the new SoPs in operation Copies of legal instruments establishing new institutions Copies of approved budgets for the new institutions Functional address/location and staff complement of the new institutions	No delays in parliamentary process for the passage of laws establishing the institutions Availability of stock of competent personnel in the newly created institutions and/or departments No diversion of resources from the newly established institutions
1.3: Autonomy and Independence of Institutions: Strengthening institutions to make them less vulnerable to external interference in the execution of their mandates.	Annual Budget of FIA passed by the Parliament Annual budget of Competent Authorities passed by the Parliament	Copies of approved direct budget and evidence allocation credited directly to accounts of FIA and Competent Authorities separately	High-level commitment to adequate resources for FIA and Competent Authorities

		Number of inter-agency MOUs signed to clarify roles Number of AML/CFT/CPF bodies with legal safeguards for autonomy (target: 100% by 2027) Number of Institutions with independent budget lines (target: by 2026) Absence of political interference in core AML/CFT/CPF operations (target: zero cases by 2028)		
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Pillar 2: Effective and Efficient AML/CFT/CPF Regulatory and Supervisory Framework and Preventive Measures

Key Result Area	Verifiable Indicators	Sources of Verification	Assumptions/Risks
2.1: Institutionalise Application of Risk-Based Approach: Deploy RBA for supervision of all reporting entities and for compliance obligations; resources are efficiently managed to produce the desired outcomes.	Number of directives and guidelines developed and issued on RBA The number of institutional AML/CFT/CPF Risk assessments conducted. Number of Reporting entities supervised using a Risk-Based Approach (RBA) Framework by 2027 Number of Sector-specific RBA tools developed and adopted by 2026 Number of strategic products developed Number of Primary Supervisors with Annual risk-based compliance plans	Authentic copies of directives and guidelines issued by FIA and other regulators. Copies of completed risk assessments conducted on products, services and other risk factors by reporting entities Supervisory Reports Strategic products (reports) launched and circulated to stakeholders Copies of Annual RBA Compliance Plan	FIA and other regulators have the powers to develop and issue directives and guidelines. Reporting entities' commitment to the conduct of institutional risk assessment and delay must be avoided. Inadequacy of resources to undertake RBA supervision Stakeholders will provide the required data/information as required for the studies

2.2: **Effective Supervisory Oversight:**

Well-designed supervisory framework to address the needs of reporting entities; supervisory actions and follow-up measures facilitate better compliance; coverage of all sectors including VASPs; application of effective, dissuasive and proportionate sanctions; development of clear methodologies and procedures for application of remedial actions; establishment of feedback between supervisors and operators, mechanism for collaboration among supervisors including joint inspections/examinations; support to private sector in meeting their obligations relating to Targeted Financial Sanctions (TFS) for TF and PF; digitalise regulatory processes to enhance identification of beneficial ownership; establish clear regulation for digital financial services and cybercrimes; development of guidelines for

Number of sectoral risk assessment guidelines and policies developed and issued.

Number of sectoral risks conducted and updated.

VASPs guidelines and directive developed and issued to reporting entities by 2026

The number of dissuasive and proportionate sanctions implemented for compliance violations.
The number of feedback received and the outcomes.

Number of Officials trained on TFS requirements

Legal and administrative Measures to be implemented to

Copies of risk assessment guidelines and policies the FIA jointly developed with primary supervisors.

Copies of completed risk assessment report conducted

Certified copies of update provided on the reports.

The number of directives and guidelines issued by regulators.

Evidence of administrative sanctions or penalties instituted for compliance violation.

Copies of TFS regulation and Guideline Developed and Issued

Training Report on TFS

Stakeholders' commitment to the execution of a successful risk assessment.

Stakeholders are capacitated and have the knowledge to conduct a comprehensive risk assessment.

FIA and BSL have the powers to regulate VASPs for AML/CFT/CPF compliance obligations.

This increases the level of effectiveness for mutual evaluation assessment.

This enhances national cooperation and coordination.

treatment of PEPs and High-Risk jurisdictions.	address targeted financial sanctions At least 50% of high-risk entities inspected annually 80% of remedial actions completed within deadlines All relevant stakeholders implementing TFS measures by 2027 Digital platforms for supervision and beneficial ownership in place by 2027	Copies of policy documents developed and issued to regulate VASPs. Copies of attendance register of engagements held to enrolled VASPs. Evidence of measures applied to address administrative issues of targeted financial sanctions.	The kinds of designated name screening systems used.
2.3: Capacity Building Enhancement: provision of adequate resources for AML/CFT/CPF supervision; provision of training including mentorship, attachments; study tours and outreach programs to promote implementation of robust AML/CFT/CPF measures.	Number of Training, Workshops and seminars for supervisors, reporting entities, Law enforce agencies, judiciary, intelligence institutions and other stakeholders. Number of public sensitisations and	Copies of training materials and attendance register. List of participated stakeholders. Documentary evidence of materials and other records for justifications	FIA has the required expertise to conduct this activity. Failure to capacity key stakeholders will create colossal gaps in the country's AML/CFT/CPF regime. Facilitators and participants must

	outreach conducted across the country. At least 500 supervisory staff trained by 2028 About 2 to 4 peer learning activities held annually from 2026 Continuous training framework established by 2026		demonstrate commitments to understand the content of the presentation.
2.4: Effective Preventive Measures: harmonisation of account opening form and CDD/KYC requirements; development of AML/CFT/CPF guidelines for the DNFBP sector; Establishment of Board Committees on Risk Management; Introduction of Independent Directors; Introduction of Bank Verification Numbers to enhance CDD process; Revision of Guidelines for PEPs; formation/strengthening Compliance Officers forum; revision of corporate governance codes; conduct of ML/TF/PF risk assessment by reporting entities	The number of Suspicious Activities identified during the onboarding stage. The number of fraudulent documentations represents onboarding flagged. Number of customers onboarded with wrong documentation flagged. Number of directives, guidelines and other policy documents developed and issued to DNFBPs.	Made available details Information of the SAR identified in the CDD stage. Copies of fraudulent documentation presented and other relevant information. Details of Suspicious Transactions Report (STR) Copies of Onsite examination reports and/or targeted inspection reports. Copies of examination letters.	This will increase statistic of STRs reported to the Agency This will aid the defection of STRs and other predicate offenses This will help to identify and proffer remedial measures for AML/CFT/CPF compliance deficiencies. Failure to implement such a board will undermine the seriousness of compliance.

Reporting entities to create a sub-board committee constituted by non-executive members responsible for addressing issues of compliance. The soundness of guidelines for PEPs and other high-risk customers. The number of implementations of such guidelines and the outcomes. Implement strategies to strengthen compliance forum as a steering body to ensure effective compliance adherence across each sector. Number of institutions that apply the principles of corporate governance code. The number of non-compliance identified, and the remedies provided The number of institutional reporting	Copies of meetings held, and the actions taken to address policy issues and compliance violations. Copies of guidelines on PEP issued to reporting entities and the number compliance check conducted. The copies of strategies implemented and the result of implementation by the respective sectors. Copies of reports indicating the result of adherence to principles of corporate governance. The number is systems, directions and control provided. Copies of risk assessment reports and the mitigating measures provided	This will reduce and burden on the entire board and will ensure effective compliance supervision in the institution. This will help to detect the risk of corruption as predominance predicate offence. This will foster a good compliance culture across the sector. This will help to determine how companies are directed and controlled Failure to understand your ML/TF/PF risk and context your institutions will be used a conduit.
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	risk assessments conducted. The type of products, services, clients, location, transactions and other risk factors assessed. 80% of reporting entities aligned with national CDD/KYC standards by 2028 AML/CFT guidelines for DNFBPs issued and enforced by 2026 60% of DNFBPs with risk committees or independent directors by 2029 100% of banks using BVNs by 2027 Functional Compliance Officers Forum established by 2026		
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Pillar 3: Strengthening Operational Effectiveness in the fight against Money Laundering and its Predicates			
Key Result Area	Verifiable Indicators	Sources of Verification	Assumptions/Risks
3.1: Effective Law Enforcement Actions: Review mandates of LEAs to reduce inter-agency rivalry and improve resource optimization; strengthen investigative and prosecutorial processes; specialised training on parallel financial investigations; incentivisation to facilitate retention of competent personnel and reduce unethical practices; establishing functional whistleblowing protection programs; simplification of operational processes and procedures; deployment of modern techniques and tools; enhancing cross-border collaboration and information sharing; strengthening asset declaration system to enhance transparency and accountability in the fight against corruption; establishing regional/provincial offices to enhance local intelligence; operationalise the Financial Crimes Working	All mandate documents reviewed and aligned by 2026. Over 500 LEA personnel trained on ML/TF/PF by 2028 including training on Parallel Financial Investigations Number of Institutions with operational Whistleblower system by 2027 FCWG operationalised by 2026 Average rating of positive feedback from users (LEAs and prosecutors) regarding the clarity and usefulness of the SOPs. Regional/Provincial Offices established by 2027.	A comprehensive report summarizing the review process including findings, recommendations and recorded approvals from agencies concerned. Completed feedback forms from users assessing the effectiveness and usability of the SOPs. Documentation of the training program, including materials, curriculum outlines, and learning objectives Report on Feedback from personnel indicating their awareness and understanding of the incentive program benefits. Official records of the finalized whistleblower policy Copies of enabling law establishing NFC3.	Some agencies may be resistant to change, which could hinder the identification of overlaps and potential conflicts. Resistance to change may hinder the adoption of new SOPs Effective communication strategies will ensure personnel are informed about the incentive program. A culture of fear or skepticism may deter personnel or the public from reporting issues despite the existence of protections. If the training is inadequate, staff may struggle to adapt to the new processes. Insufficient training may lead to users frustration

Group (FCWG) as a collaborative, integrated, public-to-public model to address significant financial crime threats with focus on - policy development to advance horizontal policy and legislative solutions to enhance law enforcement capacity and expansion of knowledge and learning for enforcement and prosecutorial partners.		Collected feedback from users assessing their experiences and satisfaction levels with the newly implemented tools. Documentation confirming the platform's operational status, including launch dates and user access records. Documentation outlining the new asset declaration protocols, including any changes made to the submission process or requirements. Documentation detailing the status of each regional office, including staffing and operational efficiency. Official records outlining the finalized governance structure, including roles and responsibilities of committee members.	and lowers satisfaction rates. Lack of technical proficiency may hinder user engagement and satisfaction. If the new protocols are not clearly communicated or if there is insufficient training, compliance may be low. Budget constraints may delay the setup or limit the quality of infrastructure and tools. Lack of engagement from key stakeholders may lead to incomplete governance processes.
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3.2: Modernise IT Infrastructure of the Financial Intelligence Agency: Modern IT systems to keep pace with rapid technological innovation relating to delivering of the financial services and products; securely deliver on its intelligence analysis and dissemination; facilitating compliance mandates in a digital landscape thereby improving business performance; promoting standardisation in reporting obligations by the reporting entities; facilitating information sharing with other members of Egmont Group of FIUs.	ICT infrastructure upgraded and all statutory reports (CDRs, CTRs, FTRs, STRs) processed digitally by 2027 All Banks have in place operational compliance management system by 2027. Launch of an updated website connecting the international and regional context directly to the agency's concrete efforts, offering a comprehensive view of both the threats and the national response to financial crime.	The completed and approved ICT Modernization Strategy document detailing technologies and implementation plans. Report of evaluation on the effectiveness of the new system in enhancing compliance goals.	Insufficient stakeholder engagement may lead to a strategy that does not fully address operational needs. Insufficient training may lead to low adoption rates and ineffective use of the system.
3.3: Establishment of Specialised AML/CFT/CPF Unit: For a more focused approach to handling AML/CFT/CPF matters at institutional level	Specialized AML/CFT/CPF units operational in key institutions by 2027 National Sanctions Committee established and functioning by 2026	Copies of approved document establishing specialized AML/CFT/CPF units Copy of legal framework establishing National Sanctions Committee Reports of meetings and feedback sessions with stakeholders during the	Misalignment could lead to compliance issues and operational inefficiencies. Deliberate inadequacy of resources for AML/CFT/CPF matters at the institutions

3.4: Functional Recovered Stolen Asset Management Office: Establish an Asset Management Office to reduce deterioration of recovered assets in line with international best practices such as StAR Initiatives; clear procedure on sharing of benefits from recovered to agencies involved in the recovery process.	Number of personnel employed by the Asset Management Office by 2027 % increase in stolen Asset recovered. Policy on sharing benefits to agencies involved in asset recovery in place by 2027. Number of training on Asset Recovery and Management organized and number of beneficiaries.	Official status report on Asset Management Office Report on recovered assets and benefit-sharing procedure	The framework will be adaptable to changes in regulatory requirements and best practices. Lack of engagement may result in an incomplete or ineffective procedure that does not meet operational requirement.
3.5: Personnel Complement and Capacity Building: Holistic approach to capacity building of LEAs including Customs; Immigration as well as Attorney-General's Department; Prosecutors; Lawyers and the Judiciary on ML/TF/PF matters; improving logistics support; developing MoU between SLBA and	Number of Training organized for each Over 200 prosecutors and judges trained by 2028 Improved logistics and support in key sector LEAs by 2027 MoU signed between SLBA and General Legal Counsel by 2027.	Copies of completed and approved training program document detailing the modules and topics covered. Detailed Training Reports. Copy of signed MoU between SLBA and General Legal Counsel.	Insufficient input may lead to a training program that does not adequately address the unique needs of each agency. Insufficient training may lead to misunderstandings or improper implementation of the

General Legal Counsel to promote sectoral compliance with AML/CFT/CPF obligations.			new logistics procedures. Lack of collaboration may lead to incomplete or ineffective MoUs that do not accurately reflect compliance responsibilities.
3.6: Efficient Data Collection and Management System: In-depth review of AML/CFT/CPF data collection process; provision of IT infrastructure for maintaining data; adequacy of resources for data collection and management; training on digital data collection tools; establishing centralised data dashboards; designation of dedicated unit for data collection within stakeholder institutions; establishment of data protection agency.	Central AML/CFT/CPF data system and dashboards in use by 2026 Development of centralized dashboards completed by 2027	The completed report detailing the findings from the review, including identified inefficiencies in the existing data collection process. The completed document detailing the plan, including specifications, budget, and timeline. The finalized document that includes detailed specifications, budget estimates, and a timeline for implementation. Report on successful deployment of the dashboards, including user access. Report on establishment of data	Oversights in the review process may result in missed opportunities for improvement. Insufficient stakeholder engagement may lead to a plan that does not fully address operational needs. Limited stakeholder engagement may lead to an incomplete understanding of needs, resulting in a suboptimal plan. Inadequate training materials or methods may lead to insufficient understanding and proficiency among participants. Technical challenges in data integration may

			collection unit, including organizational structure and roles.	hinder the functionality and effectiveness of the dashboards. Insufficient resources or institutional support may delay or prevent the establishment of the unit. Inadequate funding could hinder the agency's ability to perform its functions and enforce data protection laws effectively.
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Pillar 4: Enhancing National Coordination and International Cooperation

Key Result Area	Verifiable Indicators	Sources of Verification	Assumptions/Risks
4.1: Effective Inter-Agency Platform: Strengthening platform for dialogue among stakeholders; use of working groups and taskforces to address specific ML/TF/PF cases; reinforcing coordination mechanisms; developing options for enhancing information sharing; strengthening Advisory Board at both operational and policy levels.	Functional inter-agency platforms and taskforces established by 2026 At least 4 inter-agency/public-private meetings held annually At least 90% of stakeholders receiving updates on policies and risk assessments by 2027	Documentation of minutes from each forum meeting, including agendas, attendance records, and summaries of discussions and decisions made. Documentation that includes the names of the working groups, the specific cases they are addressing, and the members involved. The finalized coordination framework document outlining communication protocols, roles, and collaboration mechanisms among stakeholders.	Low attendance or engagement may hinder the effectiveness of the forums and the quality of collaboration Limited participation or lack of diversity may affect the effectiveness of the working groups and their ability to address the cases comprehensively. Resistance to change or lack of commitment may hinder effective implementation and utilization of the framework.
4.2: Effective Communication of Policies and Programs: Ensuring effective communication and sensitization of changes to legislative frameworks and the	Biannual briefing of stakeholders on development at Regional level from GIABA	Copies of approved memos on dissemination of outcomes of GIABA meetings, FATF	Lack of engagement or inadequate feedback may result in a policy that does not fully address the needs and

FATF Standards, as well as outcomes of risks assessment to the industry and the general public;	Dissemination of outcomes of the FATF Plenaries (3 times a year). Dissemination of outcomes of Risk Assessments or update within 5 working days of approval of the report.	Plenaries and RA reports	concerns of the intended audience.
4.3: Effective Public-Private Collaboration: Expanding public-private collaboration to improve efficiency and effectiveness of AML/CFT/CPF system; enhanced focus on results-driven policy; establishing shared priorities; enhancing information sharing between the public and private sector; leveraging technology to increase automation of processes.	Quarterly meeting of the Advisory Board at Operational Level Bi-Annual meeting of the IMC at the Policy level Biennial Colloquium on AML/CFT/CPF Dialogue Forum for Supervisor-Reporting Entities on emerging AML/CFT/CPF development including feedback mechanism	Copies of signed Meeting Minutes and Reports Report of the outcome of the Colloquium	Ineffective discussions or lack of follow-through may result in missed opportunities for meaningful collaboration. Low engagement or participation may affect the quality of discussions and the ability to reach consensus on priorities. Resistance to change or lack of commitment from one or both sectors may hinder effective implementation and adherence to the protocols. Technical challenges or resistance from staff

				may hinder effective implementation and adoption of the automation solutions.
4.4: Establish Collaboration Platforms: Adoption of international best practices for the various platforms to foster trust, secure collaboration, facilitate intelligence-led decision-making, and create a robust defence mechanism to combat financial crimes at scale.	All cooperation platforms operational by 2026 At least 2 Roundtable meetings held annually	Copy of the framework operationalizing the platforms Reports of Roundtable meetings Reports of operational outcomes	Inadequate adaptation of best practices to the local context may limit the framework's effectiveness and applicability. Lack of resources for the platforms	
4.5: Adequate preparation for 3rd Round of Mutual Evaluation: Establish National Mutual Evaluation Team including Strategic Working Groups aligned with the Immediate Outcomes (IOs) and Operational Working Groups for specific areas; conduct regular training on mutual evaluation process to facilitate good understanding of the FATF Standards and its methodology; the GIABA Mutual Evaluation Process & Procedure; establish data collection	National Coordination Committee and working groups established by second half of 2026 At least 5 mutual evaluation training sessions held before 2027 All key actions from 2nd Mutual Evaluation Report completed by February 2027 At least one mock/self-evaluation conducted by 2026	Documentation detailing the formation process, including lists of members, roles, and the scope of the committee and each working group. Training Attendance Records The completed standardized protocols and templates, including guidelines for use and implementation. Finalized Action Plan Documents	Low participation or commitment from members could hinder the effectiveness and productivity of the working groups. lack of interest may result in lower attendance than anticipated. Incomplete or unclear input may result in protocols and templates that do not fully meet user requirements. Lack of engagement or unclear responsibilities	

protocols including timelines and development of templates; ensuring completion of major recommended actions from the 2nd MER before the follow-up exit date of February 2027; Assembling and reviewing relevant documents; regular briefing and stakeholder engagements at both policy and operational levels; conduct, where possible, micro/mock/self-evaluation.	All relevant documents assembled by early 2027	Final Summary Report Briefing Session Agendas and Minutes Attendance Record^S	may lead to incomplete or ineffective action plans. The review process will be thorough and involve relevant stakeholders to ensure accuracy. If the briefings do not meet the interests or needs of stakeholders, engagement may decline over time. Limited availability or engagement from teams may affect the comprehensiveness and effectiveness of the evaluations.
4.6: Effective Management of MLA and Extradition Issues: establishing dedicated Unit at the Law Office to manage MLA and extradition requests; establishing an effective case management system, particularly on the collection of statistics; developing Standard Operating Procedures (SOPs)	MLA/Extradition Unit established and functional by 2026 SOPs and case management system for MLA/extradition requests operational by 2026 Increasing number of MLA/extradition cases processed annually	Copy of the Legal instrument establishing the MLA Unit Copies of the SOPs for undertaking MLA functions Evidence of case management system	Misalignment may lead to inefficiencies or gaps in processing requests. Failure to accurately capture user requirements may result in a system that does not fulfill its intended purpose. If the SOPs are not user-friendly, they may

and guidelines for prioritising requests; Adoption of a proactive approach in handling MLA requests.	Legal frameworks for spontaneous international information exchange in place by 2026 Active use of regional/international platforms for cooperation and information sharing Number of MoUs signed with international counterparts		hinder efficient processing. Limited engagement or feedback from stakeholders may result in incomplete or less effective guidelines.
4.7: Efficient Information Sharing Platform: Availability of appropriate procedures and legal framework to facilitate informal exchange of information especially on spontaneous basis; exploring mechanisms that would facilitate more rapid access to information; leveraging structured international and regional platforms for information sharing.		The completed document outlining the new procedures, including guidelines for informal information exchange. A document summarizing the mechanisms explored, including descriptions, objectives, and methodologies used for evaluation. Signed Partnership Agreements	If the procedures are complex or ambiguous, they may lead to inconsistent application and potential legal issues. If the mechanisms are not compatible with existing systems or processes, implementation may be challenging or ineffective. Without clear objectives and commitment, the partnerships may not produce the desired collaborative outcomes.

Pillar 5: Enhancing Beneficial Ownership for Legal Persons and Legal Arrangements			
Key Result Area	Verifiable Indicators	Sources of Verification	Assumptions/Risks
5.1: Centralisation of Information: Developing central digital registry linking registries and databases of different holders of information (Company Registry; Voluntary Organisations; Land Registries; etc.)	Number of Competent Authorities accessing the database	Physical location of the database Evidence of linkage of registries with the databases All data centralized at the NIB	Existence of skills on how to link the registries and the databases Lack of cooperation by the agencies Financial Resource constraint Knowledge Gap
5.2: Risk Assessment of Beneficial Ownership: Complete the assessment of ML/TF/PF risk associated with LPs and LAs.	65% of participation of different stakeholders in the risk assessment process Number of stakeholders in receipt of the Report	Copy of the Report of the BO/Legal Persons and Legal Arrangement Risk Assessment	
5.3: Effective Sanction Regime: Ensuring that any legal or natural persons are subject to effective, proportionate and dissuasive sanctions for failure to keep adequate and accurate BO information.	At least 80% of entities are compliant with BO reporting obligations by 2027	Examination report detailing extent of compliance List of entities sanctioned, and types of sanctions applied and proposed remedial actions	
5.4: Availability and Access to BO Information: Including accurate and up-to-date basic and BO information; ensuring timely access to BO information by relevant competent authorities; exploring new ways of securing BO information	At least 80% of BO records accurate and updated by 2027 Number of competent authorities accessing BO information within 48–72 hours	Statistics of competent authorities accessing BO information in a timely manner	

Pillar 6: Strengthen Capacity and Awareness Raising Programs			
Key Result Area	Verifiable Indicators	Sources of Verification	Assumptions/Risks
6.1: Development of Holistic Capacity Building Programs: identification of AML/CFT/CPF training needs across the public and private sectors; and non-state Actors; design and delivery of appropriate training programs to array of stakeholders at macro, meso and micro levels; assessment of the impact of capacity building; organising structured community education programs;	Comprehensive national AML/CFT/CPF training needs assessment completed by 2026 Number of capacity building programs delivered across public and private sectors and non-state Actors annually At least 70% of trained personnel report improved AML/CFT/CPF knowledge and skills Structured community education programs implemented nationwide by 2028 The numbers of PPP meetings held and the issues discussed. The number of training needs identified based on sectorial knowledge gaps and how the training materials	The training needs assessment report. Copies of training materials delivered. Reports of training conducted and whether it addresses the gaps identified. The minutes of PPP meetings and the attendance register. Report of analyses of feedback collected and the assessment of community appreciation of the message. Add post training evaluation report (Impact assessment) Include third-party review on training assessment. Require repository training resources (Manuals, e-learning tools) for sustainability.	Enhancing capacity building is very key and strategic within the AML/CFT/CPF regime. Risk of failure to conducted training will affect the enhancements of capacity building. This will count against the country in the next mutual evaluation. It helps to allocate resources to priority areas on risk-based approach. Assume that trained staff remain in AML/CFT/CPF the roles. The risk of poor absorption due to inadequate follow up or institutional support. Assumption of sufficient budget and technical partners to sustain training programs.

	addressed the identified gaps. Number of public sensitizations and outreach conducted at community levels. The number of sensitizations conducted per calendar year. Number of civil society engagement to educate the public Pre and post training assessment indicator (to measure knowledge or skills gained) Include or integrate trainings into institutional workplan. Add an outcome indicator on improved compliance course in supervisory inspection linked to training.			The risk of sufficient budget and technical partners to sustain training programs.
6.2: Awareness Raising on AML/CFT/CPF Matters: Organisation awareness programs for all stakeholder including policy makers, non-state actors such as the youths, civil society,	Number of outreach and awareness programs conducted for diverse groups (e.g., youth, civil society, religious leaders) annually	Copies of invitation of correspondences Copies of reports, training materials and attendance register. The names of institutions invited and	Knowledge is power, this will help stakeholders to understand the risk and consequences of ML/TF/PC.	

academia, the media, religious leaders, market women, etc; conduct outreach programs to Financial Institutions, DNFBPs, and NPOs to ensure better understanding of ML/TF/PF risks; establishing community-based risk monitoring and feedback mechanism to improve early detection and prevention of illicit activities; improving use of social media in creating awareness about consequences of ML/TF/PF and AML/CFT/CPF obligations.	AML/CFT/CPF awareness coverage extended to at least 80% of financial institutions, DNFBPs, and NPOs by 2027 Community based risk monitoring systems established in (All) key regions by 2027 Increased public engagement through social media and media campaigns (measured by reach and participation rates) Add an indicator for audience diversity and inclusivity (Gender, disability etc). Add an indicator for awareness level survey (Baseline and follow-up)	their significant roles to AML/CFT/CPF. Letters of invitations, the copies of report justifying the conduct of the program. Attendance registers. Copies of social media campaigns and the platforms used. Copies of the post disseminated via the various social media platforms. Report from media houses (Coverage, frequency, tone etc.)	This will improve capacity building for various stakeholders and strengthen stakeholders' coordination and collaboration. Helps the community to understand the risk and context of ML/TF. It will improve the community by identifying all illicit activities which will help to prevent further occurrences. Risk of low participation. Assume that all posts or messages are localized and adoptable to different set of audiences.
6.3: Enhancing Financial Inclusion: Promote financial inclusion policy; widening participants in the formal sector; strengthening diaspora engagement thereby attracting diaspora capital to boost domestic revenue mobilisation	Increase in the percentage of the population participating in the formal financial sector Number of innovative financial products or partnerships introduced	Copies of the types of services provided. Copies of AML/CFT/CPF Policies on Financial Inclusion Copies of the guidelines and the new	Apathy by the Diaspora community due to lack of confidence on policy implementation Risk of non-compliance to formal cash-based transfers in Rural Areas.

for national development in line with African Union Agenda 2063; facilitating innovative product design; facilitating dialogue between supervisory bodies and professional associations.	to support inclusion goals Number of engagement with diaspora communities with a clear intention and transparent focus to encourage them to invest in Sierra Leone. Develop a committee of supervisors and professional bodies to have dialogues to enhance financial inclusion by 2027. Include an indicator to track the percentage of entities or persons that have access to financial services at the rural level. Add an indicator for the minimization of informal cash-based transfers.	areas reviewed or amended. Copies of Reports on diaspora investments made Report on engagements held with diaspora and the attendance list. Bank of Sierra Leone report on financial assessment to indicate the percentage of entities or persons that have access to financial services at the rural level. A percentage compliance report on the number of rural cash transfer.	Risk of weak digital infrastructure limiting the access and compliance to cash-based transfer.
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