

# Critical Examination of AML Risk Lists: Basel AML Index 2023 vs. FATF Grey/Black Lists

## Introduction

Both the Basel AML Index 2023 and the FATF Grey/Black List are key tools for assessing global money laundering (ML) and terrorist financing (TF) risks. While they share common goals, they differ in methodology, scope, and political influence. This analysis critically examines these lists, highlighting similarities, differences, and their real-world implications.

## 1. Similarities Between the Basel AML Index & FATF Lists

### Overlapping High-Risk Countries

Several countries, such as Myanmar, the Democratic Republic of the Congo (DRC), and Mozambique, appear on both lists. These nations struggle with:

- Weak AML/CFT regulations
- High corruption levels
- Lack of financial transparency

### Corruption & Weak Governance as Core Factors

Both lists consider corruption, political instability, and regulatory weaknesses as major contributors to ML/TF risks. Countries ranking high in Basel's ML/TF risk score often have:

- Weak judiciary enforcement
- Politically exposed persons (PEPs) involved in financial crime
- Bribery and illicit financial flows

### FATF Blacklisted Nations Face Global Sanctions

Countries on the FATF Black List (e.g., Iran, North Korea, Myanmar) not only score high in Basel's risk assessment but also face severe economic sanctions.

## 2. Key Differences Between Basel AML Index & FATF Lists

### Basel Index Includes More High-Risk Countries

While FATF lists only Grey and Black List nations, the Basel AML Index provides a broader global ranking of 200+ countries based on ML/TF risk.

### FATF List Reflects Political & Economic Influence

The FATF Grey List includes major economies like UAE, Turkey, and Pakistan, despite their relatively stronger regulatory frameworks compared to Basel high-risk nations.

#### Methodology Differences: Compliance vs. Risk-Based Analysis

Basel serves as an early warning system, while FATF listings lead to regulatory actions and financial penalties.

### **3. Implications & Recommendations**

#### Basel & FATF Should Complement Each Other

- Basel provides broader risk insights, helping financial institutions adjust AML strategies.
- FATF enforces direct compliance measures, ensuring international cooperation.

#### Stronger AML Enforcement is Needed

- Financial institutions should use both Basel & FATF data to assess client risk exposure.
- Regulators should ensure AML laws are enforced consistently, regardless of political influence.
- Governments must invest in AML technology, stricter KYC/monitoring, and corruption prevention.

#### Example:

UAE was Grey Listed by FATF but is making significant AML reforms.

Pakistan was removed from FATF Grey List in 2023 due to enhanced compliance measures.

### **Conclusion**

- Basel & FATF Lists Overlap - Many high-risk countries appear on both lists.
- FATF Lists Are More Politically Driven - Some Basel high-risk nations are missing from FATF lists.
- Basel Provides a Broader AML Risk View - FATF focuses only on nations requiring urgent compliance action.
- Better Coordination Between Basel & FATF Needed - Combining risk data and enforcement mechanisms can strengthen AML frameworks worldwide.

By understanding these differences, financial institutions, regulators, and policymakers can develop more effective AML strategies to combat money laundering & terrorist financing globally.