

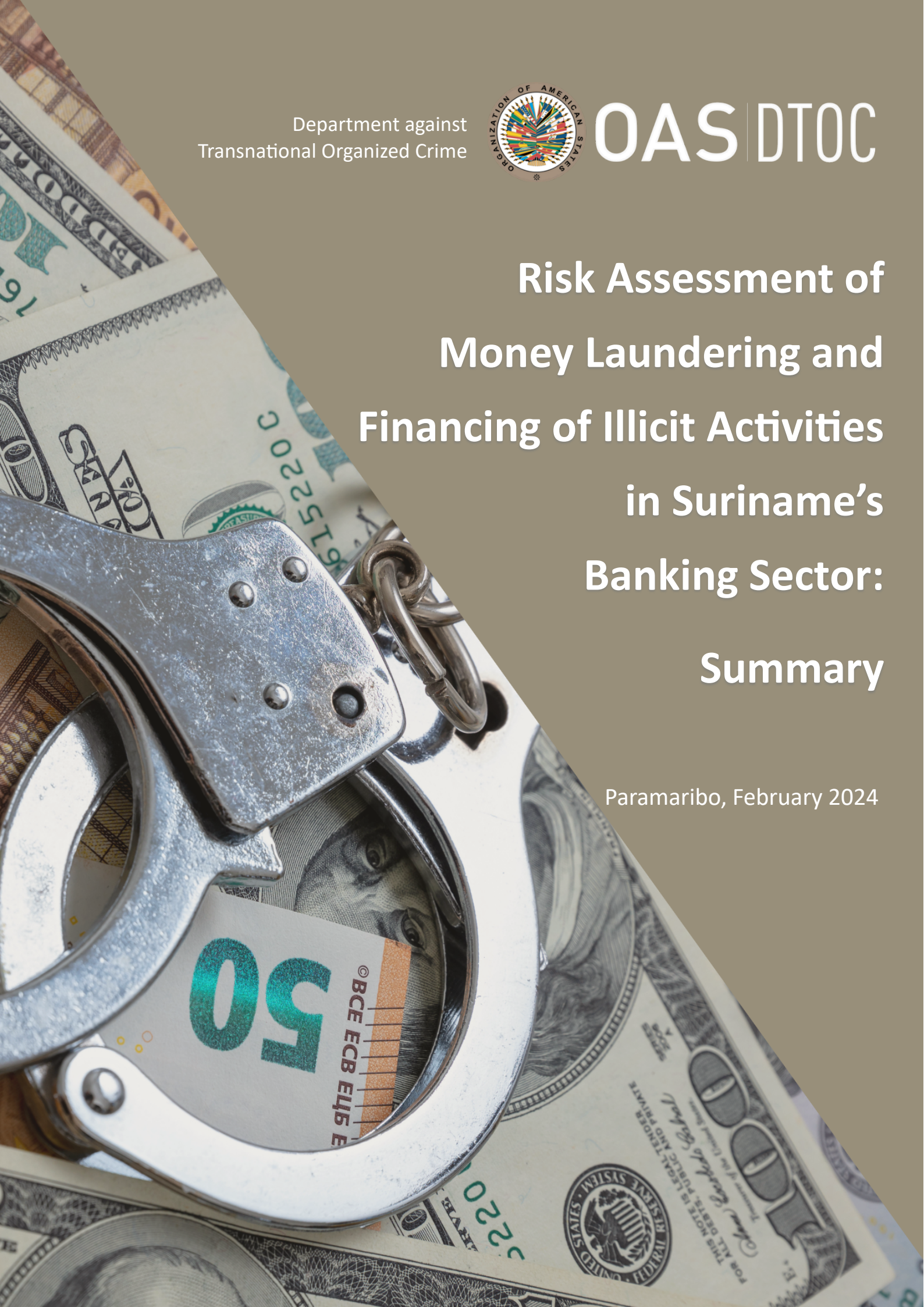
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Transnational Organized Crime



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# Risk Assessment of Money Laundering and Financing of Illicit Activities in Suriname's Banking Sector: Summary

Paramaribo, February 2024

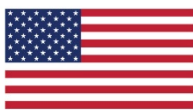






# Risk Assessment of Money Laundering and Financing of Illicit Activities in Suriname's Banking Sector: Summary

Paramaribo, February 2024



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## ABBREVIATIONS

|              |  |
|--------------|--|
| AML/CTF      | Anti-Money Laundering and Combating Terrorism Financing                                      |
| AML SC       | Anti-Money Laundering Steering Council   |
| BMCD         | Banking, Money Transaction Offices and Capital Market Supervision Department                 |
| CBvS         | Centrale Bank van Suriname (Central Bank of Suriname)  |
| CDD          | Customer Due Diligence   |
| CIS          | Council on International Sanctions   |
| CPF          | Combating Proliferation Financing  |
| DNFBP        | Designated Non-Financial Businesses and Professions  |
| DPMS         | Dealers in Precious Metals and Stones  |
| FIU Suriname | Financial Intelligence Unit Suriname   |
| IDB          | Inter-American Development Bank  |
| IMF          | International Monetary Fund  |
| MER          | Mutual Evaluation Report   |
| ML           | Money Laundering   |
| MOT          | Disclosure of Unusual Transactions Act   |
| NAMLAC       | National Anti-Money Laundering Committee   |
| NRA          | National Risk Assessment   |
| OAS/DTOC     | Organization of American States   Department against Transnational Organized Crime           |
| PF           | Proliferation Financing  |
| RBA          | Risk Based Approach  |
| SRA          | Sectoral Risk Assessment   |
| TF           | Terrorist Financing  |
| TFS          | Targeted Financial Sanctions   |
| VA           | Virtual Assets   |
| VASP         | Virtual Asset Service Provider   |
| WMTF         | Act on preventing and combating Money Laundering and Terrorism Financing (O.G. 2022 No. 138) |

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# 1. INTRODUCTION

The January 2023 Mutual Evaluation Report (MER) represents the outcome of the Caribbean Financial Action Task Force (CFATF) 4th Round Mutual Evaluation of Suriname, which took place from February 28 to March 11 of 2022. This report evaluates Suriname's Anti-Money Laundering and Combating Terrorism Financing (AML/CTF) system's effectiveness and compliance to the Financial Action Task Force (FATF) 40 recommendations, making suggestions for improvement. The report suggested updating the National Risk Assessment (NRA) and conducting sectorial risk assessments for better understanding of its primary risks.

With technical assistance from the Department against Transnational Organized Crime of the Organization of American States (OAS/DTOC), Suriname's Central Bank (CBvS) assessed Money Laundering/ Terrorism Financing (ML/TF) threats and vulnerabilities within the banking sector. Hereby, measures can be taken to prevent and combat ML and TF, using a Risk-Based Approach (RBA). In light of the most urgent actions of the CFATF MER, this sectorial risk assessment (SRA) can contribute to enhancing the AML/CTF supervisory policy.

This summary focuses on the banking sector's effectiveness and compliance with ML/TF measures, whereas the extended version contains the details.

The scope of the work in this SRA covers all regions in the country and was developed collaboratively by the public and private sectors. It utilizes various sources, including:

- a Statistical data on AML/CTF measures;
- b Insights from surveys and interviews;
- c Outputs from the 2021 NRA;
- d Recommendations from the MER resulting from CFATF's 4th Round;
- e Open-source data from FATF and its regional bodies, including mutual evaluation reports and reports from international organizations such as OAS, IDB, and the World Bank.

## 2. MONEY LAUNDERING AND FINANCING OF ILLICIT ACTIVITIES CONTEXT IN SURINAME AT NATIONAL AND SECTORAL LEVEL

### 2.1 Effectiveness of Supervision Procedures and Practice

The Act on Preventing and Combating Money Laundering and Terrorism Financing (S.B. 2022 no. 138) (WMTF) has identified the CBvS (for banks, other financial institutions and virtual assets service providers), the FIU Suriname (for DNFBPs), and the Gaming Control Board Suriname (for games of chance/gambling companies), as the regulators for the indicated sectors. Article 38 of the WMTF further stipulates that these supervisors have the authority to issue guidelines and impose fines for non-compliance.

The Supervision Directorate (DTK) of the CBvS is responsible for prudential, integrity and structural supervision. As of October 16, 2023, DTK has established the Financial Integrity Department. Within DTK, a subdivision has been made into four departments, of which the Banking, Money Transaction Offices and Capital Market Supervision Department (BMCD) is involved in the supervision of aforementioned financial institutions. There is no separate department responsible for integrity supervision, but each department has incorporated (aspects of) AML/CTF supervision into its activities.

A Directive on AML/CTF was issued in 2016 and is currently subject to modification due to amended laws as well as aligning with FATF and Basel standards. In addition, other guidelines have been issued:

- Guidelines for applying for a license to carry on the business of a credit institution with the associated instructions and appendices;
- Regulation no. 6: Corporate Governance for Credit Institutions;
- Regulation no. 7: Fit and Proper testing of Management, Supervisory Board members and Shareholders at Credit Institutions;
- Regulation no. 8: Internal Audit Department in Credit Institutions;
- Regulation no. 9: Integrity Policy for Credit Institutions;
- Regulation no. 10: Internal Control of Credit Institutions.





## 2.2 Assessment indicators of supervisory procedure and practices

The assessment of supervisory procedures and practices is one of the key elements of measuring the effectiveness level of AML/CTF. AML/CTF oversight procedures are effective when the oversight body:

- I. Is clearly identified in the law and regulations and has the appropriate authority and mandate to perform AML compliance checks;
- II. Performs its oversight activities within a comprehensive oversight framework, which includes clear oversight policies, procedures, and manuals;
- III. Has a good understanding and appreciation of the ML/TF risks within the sector;
- IV. Has sufficient trained personnel;
- V. Provides staff with the necessary skills and up-to-date knowledge for AML/CTF compliance exams;
- VI. Has the necessary resources to ensure AML/CTF compliance (such as technical capacity, budget, and resources);
- VII. Conducts a comprehensive, risk-based monitoring program consisting of on-site and off-site components on both regularly scheduled cycles and periodic spot checks (risk-based and as needed);
- VIII. Records reports and register results in a systematic manner and can use these registers effectively for policy purposes;
- IX. Exercises "moral suasion" sufficient to positively influence patterns of behavior;
- X. Can demonstrate that supervisory powers are exercised effectively and impartially.

According to the MER and the NRA, Suriname had to work on enhancing its AML and CTF measures, strengthening regulatory frameworks, improving transparency, and increasing cooperation with international organizations to combat financial crimes effectively.

## 2.3 Current economic situation and situation of the banking sector

The Surinamese economy has been struggling for years due to systemic fiscal and external imbalances. The national debt rose by the end of 2020 to 148 percent of GDP. Rising international food and energy prices, the effects of the COVID-19 pandemic on international trade and the ongoing disruption of global supply chains have put heavy pressure on economic activity in the country.

Suriname received a USD 688 million IMF loan on December 22, 2021 to stabilize its economy. Inflation peaked to 60.7 percent in 2021 and remains high at 54.6 percent in 2022 due to global and domestic reasons. The Surinamese dollar's depreciated in 2022 to only 30 percent of the value it had in 2019.

The banking sector is formed by 11 banks, of which nine primary banks, one secondary bank and a National Development Bank N.V., which is not considered a primary bank due to its activities. Within these 11 banks, there is one foreign bank (considered a large bank) and two state-owned banks (considered small banks). In 2022, banking sector assets amounted 78% of the total financial sector assets and 95% of the country's GDP, making it the most significant financial subsector. The table below provides an overview of AML/CFT factors:

**TABLE 1 NUMBER OF CLOSED ACCOUNTS OF CUSTOMERS AND PEPS FROM 2020 - 2022**

| Number of closed accounts of customers and PEPS from 2020-2022.                | 2020   | 2021   | 2022   |
|--|--------|--------|--------|
| 1. Client bank accounts with incomplete files                                  | 51.838 | 65.902 | 59.286 |
| 2. Clients who are N.V.'s (public limited company's) with bearer shares        | 68     | 69     | 102    |
| 3. Accounts closed, or customer relationships terminated due to CDD/KYC issues | 107    | 24     | 2.825  |
| 4. Clients subject to enhanced customer due diligence                          | 49.348 | 55.660 | 60.252 |
| 5. Terminated customer relationships with PEPS                                 | 1      | 2      | 5      |

## 2.4 Judicial proceedings against companies in the sector

Suriname categorizes all crimes as predicate offenses for ML and TF, including fiscal crimes. However, the sanctions are limited to what traditional criminal law offers, namely deprivation of liberty, fine, and confiscation. For example, a fine of US\$ 50,000 for a bank is not a deterrent. This indicates that the fines should be adjusted to be sufficiently dissuasive.



ML fundamental offenses, including those against legal persons, face criminal sanctions under Suriname's law. According to the Act of 5 September 2002 (SB 2002, no. 68), further amending the Penal Code (GB 1911, no.1), general provisions have been laid down regarding the criminal liability of legal persons. However, the current penalties, despite applying to various entities, lack sufficient deterrence. While legal entities can be prosecuted, sentencing options for judges are limited to custodial sanctions or fines, indicating a need for broader measures to combat ML/TF effectively.

There is a fully established framework for AML/CTF supervision. However, there is no structured policies, processes/procedures and manuals are being updated. The procedure is included in the extended version of this document.

### 3. FINDINGS FROM PREVIOUS NRA AND MER EVALUATIONS REGARDING THE FINANCIAL SECTOR

According to the 2021 NRA and the 2023 MER, Suriname should:

- Review the Penal Code and MOT Act to ensure the terrorist financing offense includes all elements of TF in accordance with the FATF recommendations.
- Conduct a risk assessment of the ML/TF risks and vulnerabilities of new technologies, virtual assets (VA) and the operations of virtual asset service providers and implement the appropriate measures to mitigate the identified ML/TF risks.
- Implement appropriate mechanisms to identify Virtual Asset Service Providers (VASPs) that may be operating in the jurisdictions and ensure the necessary preventive measures are taken.
- Clarify the role of the Council on International Sanctions (CIS) and ensure that it is fully resourced so that it can function effectively regarding its supervision of Targeted Financial Sanctions (TFS).
- Implement United Nations Security Council Resolutions (UNSCRs) in relation to Proliferation Financing (PF), including through the adoption of appropriate laws and the establishment of mechanisms to facilitate their implementation without delay.
- Address the technical deficiencies regarding the transparency of beneficial ownership of legal persons and legal arrangements, assess the ML/TF risks associated with all types of legal persons permitted under the Trade Register Act, implement mitigating measures commensurate with the risks identified, and devise mechanisms to ensure that information on the beneficial ownership of a legal person is available at a specified location in the country, or can be otherwise determined in a timely manner by a competent authority.
- Provide adequate human, and financial resources, along with needed technological tools and training, including in the identification of TF, to the Financial Intelligence Unit (FIU) Suriname as a repository and producer of financial intelligence, so it can adequately execute its core FIU functions, including the analysis of the backlog of Unusual Transaction Reports on



- To give effect to Article 33 of the Act on preventing and combating Money Laundering and Terrorism Financing (O.G. 2022 No. 138) (WMTF), the administrative and institutional framework should be developed and implemented to enable direct access, and where this is not technically feasible, indirect access, by the FIU Suriname, to the following sources of government information and all other sources of government information relevant to its functions.

### Recommended Actions:

- a The authorities should finalize and implement the Action Plan developed to address the risks identified in the NRA.
- b Suriname should ensure that simplified and enhanced due diligence measures outlined in the WMTF are informed by risk assessments.
- c Suriname should conduct risk assessments on the non-profit organization sector, Legal Persons and the risk posed by new technologies, Virtual Assets (Vas) and VASPs, to identify the risk in these sectors and determine if the controls in place are adequate. The findings of the risk assessments should be incorporated in national AML/CTF policies and mitigating measures.
- d The CIS should be made aware of its objectives and roles as a competent authority and should commence its function.
- e Targeted sectoral outreach sessions (guidance) should be held with entities that fall under the country's AML/CTF framework to make them aware of the risks associated with their sectors, and how they should use the NRA to inform their risk assessments. Higher risk sectors such as casinos and Dealers in Precious Metals and Stones (DPMS) should be prioritized and targeted.
- f Suriname should put mechanisms in place to ensure that risk assessments have a clearly articulated TF component, are kept current and reflect the evolving risk.
- g The membership and role of the CIS (which is also a supervisor for the implementation of TFS related to TF), on the National Anti-Money Laundering Commission (NAMLAC), should be clearly defined to ensure proper co-ordination of issues related to TF.

## 4. METHODOLOGY AND MAIN FINDINGS

The ML and TF risk self-assessment tool evaluates banking sector risks based on vulnerability and probability of ML/TF threats, yielding a qualitative assessment ranging from Nonexistent to Extreme Risk, represented numerically from 0 to 1 (See Table 2)

**TABLE 2 RISK ASSESSMENT MATRIX**

| Qualitative assessment of ML/TF risk | ML/TF Assessment - Result |
|--------------------------------------|---------------------------|
| Extreme                              | 1                         |
| Almost Extreme                       | 0,9                       |
| Very High                            | 0,8                       |
| High                                 | 0,7                       |
| Medium-High                          | 0,6                       |
| Medium                               | 0,5                       |
| Medium-Low                           | 0,4                       |
| Under                                | 0,3                       |
| Very Low                             | 0,2                       |
| Almost Non-existent                  | 0,1                       |
| Non-existent                         | 0                         |

Source: SRA Research team

This final assessment will be the result of the vulnerability assessment of each sector, adjusted by the national vulnerability assessment (common for both sectors) and by the probability of ML/TF threats in each individual sector.

Thus, the result of each factor will be calculated according to the following formulas:

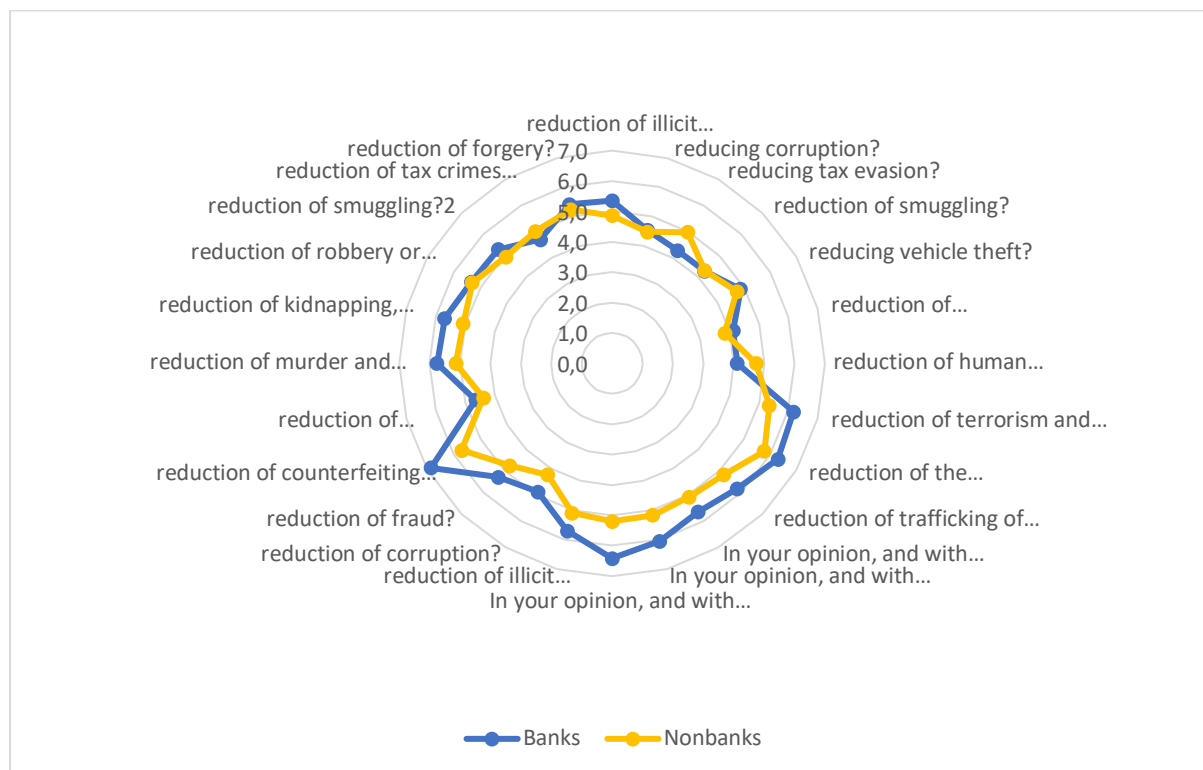
- National vulnerability: It will be the sum of the valuation of each national evaluation variable, weighted by the weight established for each variable.
- Sectoral vulnerability: This will be the sum of the valuation of each sectoral evaluation variable, weighted by the weight established for each variable.
- Sectoral vulnerability adjusted for national vulnerability: This will be the sum of sectoral and national vulnerability, weighted according to the maximum impact level of national vulnerability on sectoral vulnerability.
- Final sectoral risk score: This will be the result of applying to the adjusted sectoral vulnerability, an incremental factor of up to 50% depending on the level of probability of hazards for each sector (from Nonexistent Probability: 0%; up to Very High Probability: 50%).

Note: Since the objective of this study is to complement the previous national risk assessment, the results found in the recently completed national risk assessment were taken as a starting point. Therefore, in order to calculate the ML/TF risk in the banking sector, the assessment carried out two years ago was not repeated. The variables and the result of their assessment is the one contemplated in the NRA. Considering that progress has been made since the NRA was completed, the tool used makes it easier to give a higher or lower weighting to the national assessment, so that the final result is as representative as possible of the current situation.

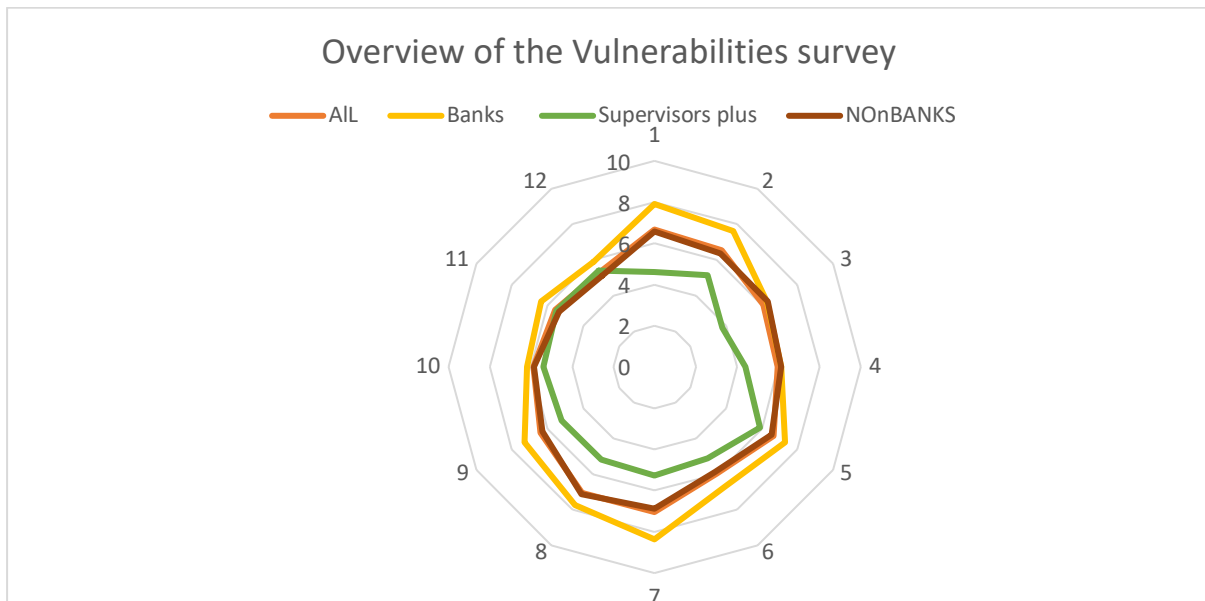
### Main Findings

**Threats:** The score that stakeholders in the financial sector give on vulnerabilities within the sector is remarkable. A score of 7 (high vulnerability) was given overall. Within the banks, a score of 6.1 was recorded, while employees scored a 5.5 (moderate vulnerability) for the sector in which they work (see Figure 1)

**FIGURE 1 OVERVIEW RESULTS OF THE THREATS QUESTIONNAIRE**



**Vulnerabilities:** the score that stakeholders in the financial sector give to regarding vulnerabilities within the sector is also noteworthy. A score of 6.2 (moderate Threat) was given overall. Within the banks, a score of 5.5 was recorded, while employees scored a 5.0 for the sector in which they work.

**FIGURE 2 OVERVIEW RESULTS OF THE VULNERABILITIES QUESTIONNAIRE**

**TABLE 3 DETAILED LISTING OF THE SURVEY RESULTS**

| No | Indicator  | Analysis   |
|----|--|--|
| 1  | Comprehensiveness of the AML legal framework             | Overall, the assessment is that the country has comprehensive laws and regulations regarding AML preventive measures and AML oversight of the banking sector. The banking sector has a higher score, 8, compared to the other financial institutions   |
| 2  | Effectiveness of supervisory procedures and practices    | The assessment overall shows that the effectiveness of AML supervisory procedures and practices for the banking sector is moderate / medium. Noteworthy is that supervisors and regulators have a score of 5 while the banks received a significantly higher score for the quality of the supervisory procedures |
| 3  | Availability and enforcement of administrative sanctions | Regarding the availability and enforcement of administrative sanctions, the supervisors and regulators scored evidently lower than the other surveyed groups. The overall score for this indicator is moderately low   |
| 4  | Availability and application of criminal sanctions       | Regarding the availability and applications of criminal sanctions, the supervisors and regulators scored evidently lower than the other surveyed groups. The overall score for this indicator is moderately low  |
| 5  | Availability and effectiveness of entry controls         | The overall score regarding the availability and effectiveness of entry controls is moderate   |
| 6  | Integrity of banking personnel                           | The overall score regarding the integrity of banking personnel is moderately low   |



**TABLE 4 DETAILED LISTING OF THE SURVEY RESULTS (CONTINUED)**

| No | Indicator   | Analysis   |
|----|---|--|
| 7  | Staff knowledge of AML  | The assessment overall shows that the knowledge of the staff in the financial sector is seen as moderate. Notably the bank staff received a relatively higher than moderate score while the supervisors and regulators received a relatively lower score.              |
| 8  | Effectiveness of the compliance function                        | The assessment overall shows that the effectiveness of the compliance function in the financial sector is seen as moderate. Notably the banks received a relatively higher than moderate score while the supervisors and regulators received a relatively lower score. |
| 9  | Effectiveness of surveillance and suspicious activity reporting | The overall score regarding the effectiveness of surveillance and suspicious activity reporting in the financial sectors is seen as moderate, with a relatively lower score for the supervisors and regulators.  |
| 10 | Availability and access to beneficial ownership information     | The availability and access to beneficial ownership information in the financial sector is seen as moderate  |
| 11 | Availability of a reliable identification infrastructure        | The availability of a reliable identification infrastructure is seen as moderate   |
| 12 | Availability of independent sources of information              | The availability of independent sources of information is seen as moderately low   |

On November 9th, 2023 validation sessions at the CBvS were organized with stakeholders to validate preliminary findings. The validation sessions, combined with thorough discussions engaging all stakeholders, enriched the study with additional perspectives. These valuable insights served to complement and validated the information acquired through the validation surveys.

The final result of the risk of ML/TF for the banking sector in Suriname is found to be medium-high. This is the result of a combination of a medium vulnerability for the banking sector, with a high level of ML/TF threats. Among the variables analyzed, it is considered that those that offer the least vulnerabilities for abuse of the system through ML and TF are:

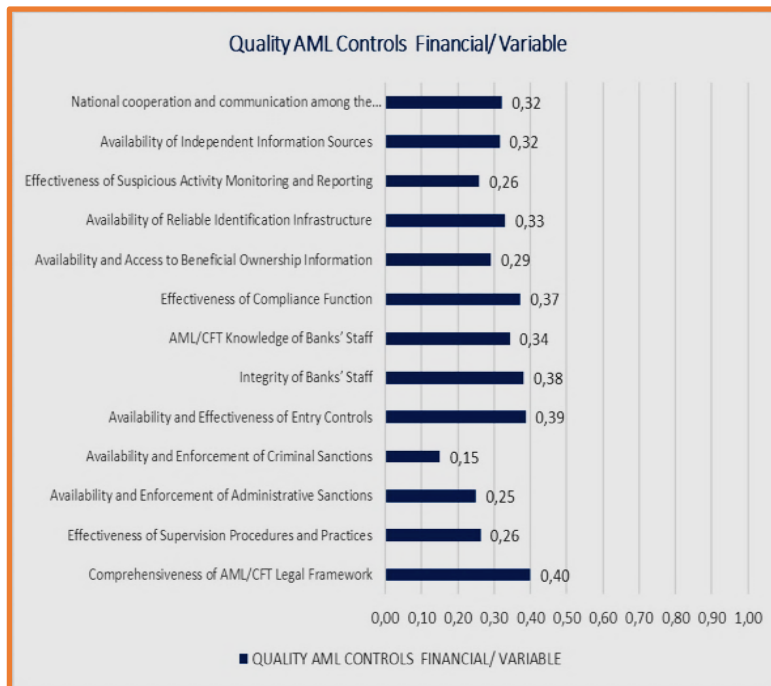
- Comprehensiveness of the AML legal framework
- Availability and effectiveness of entry controls
- Integrity of banking personnel
- Staff knowledge of AML
- Effectiveness of the compliance function
- Availability of a reliable identification infrastructure

Interviews and responses to questionnaires show that the general prevention framework has been sufficiently established, the obligations are known and applied by employees in the sector. On the other hand, the following variables showed a greater vulnerability when analyzing the interviews and the responses to the questionnaires:

- Effectiveness of supervisory procedures and practices
- Availability and enforcement of administrative sanctions
- Availability and application of criminal sanctions
- Effectiveness of surveillance and suspicious activity reporting
- Availability and access to beneficial ownership information

As can be observed, the greatest vulnerabilities are concentrated around the effectiveness of the implemented system. Within this, the high vulnerability assigned to the effectiveness of STR sent and the lack of effective capacity to obtain up-to-date and reliable information on the final beneficiaries of legal entities stand out.

**TABLE 45    QUALITY ASSESSMENT OF AML CONTROLS**



Source: SRA Research team



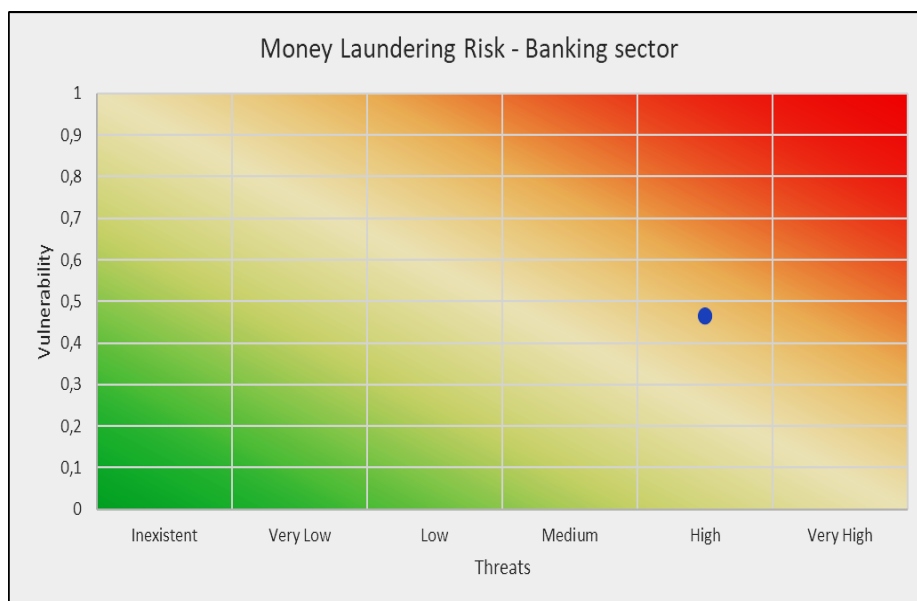
Threats - this assessment is a qualitative estimate, which will have an impact on the final risk score for the sector. The estimated threat level for the sector (from Non-existent to Very High Threat) is selected also in the tool.

**TABLE 6 SNAPSHOT OF THE RISK OF ML/TF FOR THE BANKING SECTOR VARIABLES IN SURINAME**

| #  | SECTOR ASSESSMENT<br>MONEY LAUNDERING VARIABLES                 | WEIGHT VARIABLES |  | Sector BANKS             |        |
|----|---|------------------|--|--------------------------|--------|
|    |   | WEIGHT SELECT OR | WEIGHTS<br>0 (lower weight) - 12 (higher weight) | VULNERABILITY ASSESSMENT | RESULT |
| 1  | Comprehensiveness of the AML legal framework                    | < >              | 8%   | Low                      | 0.30   |
| 2  | Effectiveness of supervisory procedures and practices           | < >              | 9%   | Medium-High              | 0.60   |
| 3  | Availability and enforcement of administrative sanctions        | < >              | 6%   | Medium                   | 0.50   |
| 4  | Availability and application of criminal sanctions              | < >              | 7%   | Medium-High              | 0.60   |
| 5  | Availability and effectiveness of entry controls                | < >              | 8%   | Low                      | 0.30   |
| 6  | Integrity of banking personnel                                  | < >              | 8%   | Medium-Low               | 0.40   |
| 7  | Staff knowledge of AML  | < >              | 6%   | Low                      | 0.30   |
| 8  | Effectiveness of the compliance function                        | < >              | 7%   | Low                      | 0.30   |
| 9  | Effectiveness of surveillance and suspicious activity reporting | < >              | 9%   | Medium-High              | 0.60   |
| 10 | Availability and access to beneficial ownership information     | < >              | 10%  | Very High                | 0.80   |
| 11 | Availability of a reliable identification infrastructure        | < >              | 10%  | Medium-Low               | 0.40   |
| 12 | Availability of independent sources of information              | < >              | 12%  | Medium                   | 0.50   |

In relation to the weight given to each variable, an attempt has been made to overweight those variables that are considered to be particularly essential for combating ML/TF, such as those that establish the general framework for action and those that focus on the effectiveness of the application of the system as a whole.

**TABLE 7 FINAL RISK ASSESSMENT AND GRAPHIC REPRESENTATION**



Source: SRA Research team

The evaluation of risk indicates that the susceptibility (vulnerability) to AML in the banking sector is viewed as moderate, whereas the perceived level of threats is considered high.

## 5. CONCLUSIONS AND RECOMMENDATIONS

### Conclusions

In summary, the Surinamese banking sector faces a medium-high risk of ML and TF due to significant vulnerabilities and prevalent threats.

The informal economy, representing 30% of employment, and limited banking penetration, especially in regions where access to banking services is limited, exacerbate ML/TF risks. Suriname's cash-intensive economy poses a structural vulnerability to ML and TF, especially with the high risk of corruption and organized crimes (the two high rated threats).

This is exacerbated by a segment of the population lacking the means to meet regulatory demands for identification and source verification. Simultaneously, a national agenda promoting financial inclusion creates a complex dilemma for the sector, requiring a delicate balance between these two fundamental but sometimes conflicting requirements.

It is paramount to underline that key collaborative initiatives must be pursued to advance the nation's AML efforts while upholding the principle of financial inclusion. Collaborative efforts to enhance supervision, facilitate information access, leverage complementary regulations, broaden sectoral oversight, counter de-risking, and fortify feedback mechanisms will collectively underpin the country's stride towards a more secure and inclusive financial landscape.

### Recommendations

1. Strengthen Risk-Based Approach:
  - Develop and implement a robust risk-based approach that tailors AML and CTF efforts to the specific risks faced by individual institutions.
  - Foster a culture of risk awareness and assessment throughout the sector to enhance identification, assessment, and mitigation of ML and TF risks.
2. Enhance Customer Due Diligence:
  - Continually review and update customer due diligence processes (including KYC, CDD and EDD) to ensure the collection of accurate and comprehensive customer information, including beneficial ownership details.
  - Implement ongoing monitoring mechanisms to promptly identify and assess any changes in customer behavior, transactions, or risk profiles.



3. Leverage Technology for Monitoring:
  - Banks should invest in advanced technological solutions, such as artificial intelligence and machine learning, to detect suspicious patterns and anomalies in transactions, thereby enhancing the ability to identify potentially illicit activities.
4. Strengthen Training and Capacity Building:
  - Provide regular training programs for staff on AML/CTF regulations, typologies, and emerging risks to enhance their understanding and ability to recognize and report suspicious activities.
5. Strengthen the Statistical Monitoring Mechanism of the AML/CTF System.
  - Promote the implementation of a statistical system that collects information from all agencies related to the AML/CTF system, so that updated information can be obtained that serves as a basis for measuring its impact and effectiveness.
6. Foster Public-Private Partnerships:
  - Promote collaboration and information sharing between banks, regulatory authorities, law enforcement agencies, and other stakeholders to collectively combat financial crimes.
7. Implement Transaction Monitoring Mechanisms:
  - Banks should develop and implement automated transaction monitoring systems that can identify and flag potentially suspicious transactions in real-time, facilitating timely reporting and investigation.
8. Improve Inter-Institutional Cooperation and Coordination.
  - The analysis of intelligence information requires that the entities that generate and use the information have interaction protocols that give the processes agility, clarity, and legality, so that it can be used effectively in judicial processes. As a result, banking entities should have mechanisms to facilitate access to the information required by the authorities for investigations, guaranteeing the delivery of the information they request in a timely manner.
9. Strengthen International Cooperation:
  - Collaborate with international counterparts and financial institutions to exchange information, share best practices, and collectively combat cross-border ML and TF.
10. Regular Independent Audits and Assessments:
  - Conduct periodic independent audits and assessments of AML/CTF processes to identify gaps, weaknesses, and areas for improvement, and ensure compliance with regulatory requirements.

11. Promote Whistleblower Protection:

- Establish mechanisms to protect whistleblowers who report suspicious activities, encouraging internal reporting and enhancing the sector's ability to uncover potential illicit activities.

12. Focus on Emerging Risks:

- Stay updated on emerging ML and TF risks, such as virtual assets, crypto currencies, and online platforms, and adapt strategies accordingly.

13. Educate Customers and Public Awareness:

- Develop educational campaigns aimed at raising awareness among customers and the general public about the importance of AML/CTF measures, encouraging vigilance and cooperation.

14. Strengthen Sanctions Screening:

- Implement comprehensive sanctions screening processes to ensure that transactions and relationships with individuals, entities, and jurisdictions subject to sanctions are identified and appropriately managed.

15. Periodic Regulatory Review:

- Engage in regular dialogues with regulatory authorities to provide feedback on the effectiveness of AML/CTF regulations and suggest refinements based on practical experience.

By embracing these recommendations, the banking sector in Suriname can bolster its defenses against ML and TF activities, while contributing to the stability and integrity of the broader financial ecosystem.





# OAS DTOC

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