



Anti-money laundering and counter-terrorist financing measures

Uganda

**7th Enhanced Follow-up Report & Technical Compliance Re-Rating
September 2021**

Follow-Up Report





The Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) was officially established in 1999 in Arusha, Tanzania through a Memorandum of Understanding (MOU). As at the date of this Report, ESAAMLG membership comprises of 19 countries and also includes a number of regional and international observers such as AUSTRAC, COMESA, Commonwealth Secretariat, East African Community, Egmont Group of Financial Intelligence Units, FATF, GIZ, IMF, SADC, United Kingdom, United Nations, UNODC, United States of America, World Bank and World Customs Organization.

ESAAMLG's members and observers are committed to the effective implementation and enforcement of internationally accepted standards against money laundering and the financing of terrorism and proliferation, in particular the FATF Recommendations.

For more information about the ESAAMLG, please visit the website: www.esaamlg.org

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This report was approved by the ESAAMLG Task Force of Senior Officials at the September 2021 virtual meeting.

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UGANDA: 7th FOLLOW-UP REPORT & 3rd REQUEST FOR RE-RATING

I. INTRODUCTION

1. The Mutual Evaluation Report (MER) of Uganda was adopted by the Task Force in April 2016 and subsequently approved by the Council of Ministers in May 2016. This follow-up report assesses the progress made by Uganda to resolve the technical compliance shortcomings identified in its MER. New ratings are given when sufficient progress has been made. This report also assesses the progress made in implementing the new requirements of the FATF Recommendations that has been updated since adoption of the MER: Recommendations 8 and 21. In general, countries are expected to have corrected most or all of their technical compliance shortcomings by the end of the second year of follow-up at the latest. This report does not cover the progress made by Uganda in improving its effectiveness.

II. KEY FINDINGS OF THE MUTUAL EVALUATION REPORT

2. The MER¹ gave Uganda the following technical compliance ratings:

Table 1. Technical compliance ratings², April 2016

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

3. In the light of these results, Uganda was placed in the enhanced follow-up process.³
4. Subsequent to the adoption of the MER, Uganda submitted its 1st and 2nd requests for

¹ Mutual Evaluation Report (MER) on Uganda, April 2016, https://esaamlg.org/reports/2ND-ROUND-MUTUAL-EVALUATION-REPORT-OF-THE-REPUBLIC-OF-UGANDA_1.pdf

² Four technical compliance ratings are available: compliant (C), largely compliant (LC), partially compliant (PC), and non-compliant (NC).

³ Enhanced follow-up is based on the traditional ESAAMLG policy for members with significant shortcomings (in technical compliance or effectiveness) in their AML/CFT systems, and involves a more intense follow-up process.

re-rating and these were published on the ESAAMLG website⁴ as shown in Table 1(a) below:

Table 1 (a): Technical compliance following revision of ratings, December 2020⁵

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

5. The assessment of Uganda's request for technical compliance re-ratings and the preparation of this report were undertaken by the following experts (Supported by ESAAMLG Secretariat: Muluken Yirga Dubale and Chris Likomwa):

- James Manyonge (Kenya)
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- Kennedy Mwai (Kenya)
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- Sandra Hall (Seychelles)
- May Paule Rabat (Seycheles)
- Thomas Mongella (Tanzania)
- Juma Msafiri (Tanzania)

6. Part 3 of this report summarises the progress made by Uganda on technical

⁴ https://www.esaamlg.org/index.php/Mutual_Evaluations/readmore_me/432

⁵ Re-ratings in **red italics** for September 2018 and December 2020.

compliance. Part 4 sets out conclusions and contains a table of Recommendations for which a new rating has been given.

III. OVERVIEW OF PROGRESS IN TECHNICAL COMPLIANCE

7. This section of the report summarises the progress made by Uganda in improving technical compliance by resolving the shortcomings identified in its MER and implementing the new requirements associated with the changes made to FATF standards since adoption of the MER (Recs. 2, 8, 15 and 21).

3.1. Progress in resolving the technical compliance shortcomings identified in the MER

8. Uganda has made progress in resolving the technical compliance shortcomings identified in the MER, the 2nd FUR and the 5th FUR for Recommendations 2 and 14 which both had received a PC rating.

9. Given the progress made, Uganda's rating has been revised for the following Recommendations 2 and 14 and retained the ratings for R.8, R.15 and R.21.

3.1.1. Recommendation 2- National cooperation and coordination (Originally rated PC –rerated to LC)

10. The main shortcomings under the MER related to: a) The activities of the AML/CFT Committee are not informed by identified ML/TF risks and are not regularly updated to be consistent with the identified risks; b) the AML/CFT Committee has not coordinated development of AML/CFT policies based on identified ML/TF risks; c) there is no framework in place to coordinate proliferation issues and the extent of the ML/TF risk to proliferation has not been determined to enable categorisation of the sector as low or high risk and the sector might require to be prioritised. In February 2018, R.2 was amended to ensure compatibility of AML/CFT requirements and data protection and privacy rules, and to promote domestic inter-agency information sharing among competent authorities.

11. Uganda completed its NRA in 2017 which identified its AML/CFT risks. An Action plan was also developed as part of the NRA. The Action Plan had several key actions such as, enactment of relevant laws and amendment of those with loopholes, promote the use of electronic payment options and encourage the use of formal financial institutions, strengthen capacity and resource allocation to FIA and LEAs, introduce AML/CFT off-site and onsite supervision and adopt a risk-based approach.

12. In September 2020, Uganda came up with a National Strategy for Combatting Money Laundering and the Financing of Terrorism and Proliferation 2020/21–2024/25 which sets out the approach which Uganda adopts to tackle money

laundering (ML), terrorist financing (TF) and proliferation financing (PF) threats. The strategy developed was based on the 2017 NRA and 2016 MER findings. The strategy recognizes the importance of cooperation of entities represented on the Taskforce of all in collaboration with MOFPED and support from the Government of Uganda. The strategy highlights the key activities which will be undertaken in order to achieve the objectives, and they including the following: i) Completion of the ML/TF risk assessment of legal persons. ii) Completion of the TF risk assessment for the NPO sector. iii) Develop and implement a legal framework to criminalize proliferation financing. iv) Seek MLA and other forms of international cooperation for ML, TF and high-risk predicates. v) Assign / appoint official persons or points of contact for AML/CFT matters for all key stakeholders. vi) Establish joint working groups and taskforces to handle particular large high priority cases. vii) Develop coordination mechanisms between competent authorities. viii) Engage with foreign counterparts on a bilateral or regional perspective. **Criterion 2.1 is Met.**

13. The Anti-Money Laundering and Combatting of Terrorist Financing Taskforce was constituted by the Minister responsible for Finance Planning and Economic Development and among its terms of reference, include to develop and implement a national AML/CFT Policy. Uganda has also adopted a mechanism of fostering and enhancing cooperation through signing MOUs with respective law enforcement and supervisory bodies and competent authorities. The FIA has signed MOUs with BOU, URA, CMA, IRA, DPP and UPF. **Criterion 2.3 is Met.**

14. The reconstituted AML/CFT/CPF Task Force Terms of Reference gives it a mandate to deal with PF matters. The National AML/CFT Strategy has included, among its objectives, matters related to PF Further, Uganda has not addressed the deficiencies in R7 and has no law dealing with PF to enable the authorities to identify the areas of coordination and cooperation on PF at a domestic level. **c.2.4 is rerated with Partly Met.**

15. The new c2.5 was rerated as Met. Uganda has mechanisms in place to ensure compatibility of AML/CFT requirements with data protection and privacy rules (see FUR Dec. 2020).

Weighing and Conclusion

16. *Uganda has fully addressed the identified deficiencies against Criteria 2.1, 2.3 and 2.5 and partly addressed the deficiency under Criterion 2.4. Uganda has not addressed the deficiencies in R7 and has no law dealing with PF which would have also impact on the extent to which the competent authorities are coordinating and cooperating on CPF matters. Uganda is rerated Largely Compliant with the requirements of Recommendation 2.*

3.1.2. Recommendation 14- Money or Value Transfer Services (Originally PC –rerated to LC)

17. The main shortcomings under the MER related to: a) there is inadequate monitoring on Mobile Money Service Providers (as a sub category of MVTS); and b) there are no explicit legal requirements for agents to be licensed or registered and included in the AML/CFT programmes of MVTS providers.
18. Uganda passed a National Payment Systems Act (NPSA) in 2020. In terms of Sections 6 and 7 of the NPSA, no person can operate MVTS business without having a license from the BoU. The law requires a person who wishes to offer payment services, establish or operate a payment system, or issue payment instruments, to apply to BoU. Under Sec 4 and 19, the BoU is mandated to regulate, supervise and oversee the operations of payment systems. **Criterion 14.1 is met.**
19. The definition of accountable person under S.1 of AMLA, 2013 includes MVTS providers (including mobile money service providers) and therefore subject to AML/CFT obligations. This does not apply to any natural or legal person that provides other persons solely with message or other support systems for transmitting funds.⁶ The BoU is the designated AML/CFT supervisor of MVTS (See Para. 14(d) of the Second Schedule of AMLA 2013). **Criterion 14.3 is met.**
20. Both MVTS providers and their agents and mobile money providers are required to be licenced under S.7 of the NPSA. See analysis on 14.1. **Criterion 14.4 is Met.**
21. The NPSA covers all MVTS providers, including mobile service providers. This does not apply to any natural or legal person that provides other persons solely with message or other support systems for transmitting funds. The deficiencies that

⁶ This includes any person who solely provides a messaging service or support systems for transmitting the funds eg transmission of a sent or received short message (SMS), or the software such as *fundamo* which is a platform provider of mobile financial services for mobile network operators and financial institutions in developing economies. It enables financial institutions and other service providers to offer a wide range of mobile banking and payments services to their customers. The exemption is to remove anyone not involved in the financial activity itself. The reviewers found that this exemption is aligned to the FATF one in that the FATF envisages financial services while the exempted institutions are served merely as switches for facilitating transactions.

existed in the 5th FUR including on the status of the Guidelines issued by the BoU are still outstanding and therefore there is no progress on this criterion. Thus, there is no explicit legal provision for agents to be regulated for AML/CFT purposes. **Criterion 14.5 remains as Partly Met.**

Weighing and Conclusion

22. *Uganda has fully addressed the identified deficiencies against Criteria 14.1, 14.4. However, the deficiencies on c 14.5 are still outstanding. There is no explicit legal provision for agents to be regulated for AML/CFT purposes. The Guidelines issued by the BoU on Mobile Money is a provisional measure and not enforceable means as they are not supported by sanctions. The reviewers could not also determine the legal basis for the authorities to issue the Guidelines (See 5th FUR (2018)). Uganda is rerated with LC on Recommendation 14.*

3.2 Progress on Recommendations which have Changed since the Adoption of the MER

3.2.1. Recommendation 8-Non-Profit Organisations (Originally rated NC-No rerating)

23. In June 2016, R.8 and its Interpretive Note were significantly revised rendering the analysis of R.8 in Uganda's MER obsolete.
24. Uganda has not adequately reviewed its NPO sector, including a mapping of its size, features and activities with a view to identify features and types of NPOs which by virtue of their activities or characteristics, are likely to be at the risk of terrorist financing abuse. In addition, the authorities have not identified any threats of NPO abuse emanating from terrorist entities or the manner in which such abuse is done.
25. Uganda has not carried out any review to determine adequacy of measures, including laws and regulations targeting a subset of NPOs that may be abused for terrorist financing to guide application of appropriate risk-based measures. Furthermore, the country does not have any framework in place or capacity to obtain timely information on the activities of the NPOs, their size and other relevant features which would help in identifying characteristics which would potentially make them vulnerable to TF risks.
26. Uganda's National NGO Policy was developed prior to the Second Round AML/CFT assessment and there is no evidence that it has been updated or reviewed in line with the risks identified in the NRA. Besides, the NRA does not comprehensively cover the

TF risks in relation to NPOs. The Policy does not have comprehensive elements on enhancing the transparency and accountability of the NPO Sector in general and from a TF's perspective. Uganda is yet to develop best practices to address terrorist financing risk and vulnerabilities in the NGO sector that would protect it from being exposed to terrorist financing abuse. The outreach activities to the NPOs and their donors is still in process.

27. Uganda has not developed any risk-based measures for supervision and monitoring the NPOs which may be at risk of being abused for terrorist financing purposes. The NPOs are not under obligation to comply with the requirements of Rec.8 and the authorities cannot monitor their compliance. As it was stated in the MER, the sanctions prescribed in the Non-Governmental Organisations Act Chap 113 as amended in 2006, of a fine or of less than one year imprisonment or both are not dissuasive, effective or proportionate enough and are not related in any way to TF.
28. Uganda does not have in place measures to ensure effective cooperation, co-ordination and information-sharing to the extent possible among all levels of appropriate authorities or organisations that hold relevant information on NPOs. Apart from existence of the legal provisions for NGOs to keep records, the Uganda authorities did not appear to have specific investigative expertise and capability to examine those NPOs suspected of either being exploited by, or actively supporting, terrorist activity or terrorist organisations. Uganda does not have appropriate mechanisms to ensure that information is promptly shared with competent authorities, in order to take preventive or investigative action when there is suspicion or reasonable grounds to suspect that a particular NPO is involved in terrorist financing abuse and/or is a front for fundraising by a terrorist organisation; is being exploited as a conduit for terrorist financing, including for the purpose of escaping asset freezing measures, or other forms of terrorist support; or is concealing or obscuring the clandestine diversion of funds intended for legitimate purposes, but redirected for the benefit of terrorists or terrorist organisations.
29. Uganda does not have points of contact and procedures to facilitate prompt sharing of information with competent authorities in order to take preventive or investigative action regarding particular NPOs suspected of terrorist financing or involvement in other forms of terrorist support.

Weighting and Conclusion

30. Uganda does not meet all the criteria under this Recommendation. All the measures regulating the activities of NPOs in Uganda under the laws are not for purposes of dealing with the possible exposure of the NPO sector to abuse for TF activities. Authorities have not undertaken a comprehensive review of the NPO sector to appropriately understand TF risks and have not taken steps to promote targeted risk-based supervision or monitoring of NPOs. The NPO sector has not been engaged to raise awareness about potential vulnerabilities to TF abuse and risks. In view of the foregoing deficiencies, **Uganda has been rated Non-Compliant with the revised requirements of Recommendation 8.**

3.2.2 Recommendation 15 – New Technologies (Rerated PC in 2nd FUR – No Rerating)

31. Under its Second Round MER, Uganda was rated Non-Compliant with the requirements of this Recommendation. The major deficiency was that the Ugandan legal framework does not provide for ML/TF risks from new technologies. No ML/TF risk assessments were also done in the sector. In the 2nd FUR, Uganda Met the requirements of c.15.2. R.15 was revised, introducing new requirements on VAs and VASPs.

32. Under the 2nd FUR, it was indicated that except in the case of 13 commercial banks (out of the 26 banks) and 1 MVTs (out of more than 200 regulated and unregulated institutions) which are identified as more vulnerable than other financial institutions under the NRA, all other financial institutions have not yet identified and assessed ML/TF risks that may arise in relation to development of their new products/business practices. The authorities did not submit any update since the 2018 FUR. **Criterion 15.1 remains Not Met.**

33. Uganda has not identified and assessed the ML/TF risks emerging from VA and VASPs activities. As a result, there is no risk-based approach to ensure that measures to prevent or mitigate ML/TF are commensurate with the risks identified. The Second Schedule to AMLA was amended to include VASPs as accountable persons (The Anti-Money Laundering (Amendment of Second Schedule) Instrument, 2020). As such VASPs are accountable persons subject to all AML/CFT obligations under the AMLA. Therefore, VASPs are required to identify, assess, manage and mitigate ML/TF risks as per Regulation 9 (2) of the Anti-Money Laundering Regulations. **Criterion 15.3 is not met.**

34. The definition of accountable person under Schedule 2 of AMLA, 2013 (as amended by the AML (Amendment of Second Schedule) Instrument No. 136/2020) includes VASPs. Regulations 3 and 4 of the Anti-Money Laundering Regulations 2015 requires an accountable person to register with FIA. However, these provisions cannot be enforceable without requiring the VASPs to get licensed or registered as any other

business before they get registered with the FIA for AML/CFT purposes. In other words, there is no registration or licensing requirements for VASPs before they start operating their business in Uganda. Moreover, there is no requirement for competent authorities to take necessary legal or regulatory measures to prevent criminals or their associates from holding, or being the beneficial owner of, a significant or controlling interest, or holding a management function in, a VASP. **Criterion 15.4 is Not Met.**

35. Uganda has not taken action to identify natural or legal persons that carry out VASP activities without the requisite license or registration and apply appropriate sanctions to them. **Criterion 15.5 is Not Met.**
36. VASPs are not subject to risk-based supervision. There is also no designated supervisory with adequate power to supervise or monitor and ensure compliance by VASPs with requirements to the AML Act and Regulations as there is no yet a designated supervisory authority for VASPs in Uganda. **Criterion 15.6 is Not Met.**
37. Uganda has not established any guidelines or provided any feedback to VASPs. Further, same deficiencies that were noted in the MER on Rec 34 will also apply under c.15.7. **Criterion 15.7 is Not Met.**
38. VASPs are subject to the sanctions under S.116 of AMLA. See 5th FUR and the analysis of Rec 35 as it was re rated to LC. **Criterion 15.8 is Mostly Met.**
39. VASPs are required to comply with Recommendations 10 to 21 since they are subject to supervision. Uganda was rated with C on Recs 11, 13, 17, 18 and 20 and with LC on Recommendation 10. The same deficiencies that were noted and still outstanding against Recs 12, 14 and 19 which were rated PC will also apply under c.15.9. **Criterion 15.9 is Mostly Met.**
40. VASPs are required to comply with Recommendations 6 and 7 since they are subject to supervision as accountable persons under Schedule 2 of the AMLA. However, Uganda has outstanding deficiencies on Rec 7 and the same would apply under c.15.10. **Criterion 15.10 is Partly Met.**
41. Uganda was rated partially compliant with Recommendations 37, 38, and 40 and non-complaint with Recommendation 39. It therefore means the same deficiencies would prevent Uganda from rapidly providing widest range of international cooperation. The definition of property is broad enough to cover also virtual assets

and there is no provision that excludes virtual assets as properties in Uganda. ***This criterion is Partly Met.***

Weighing and Conclusion

42. VASPs are included as one of the Accountable Persons under Schedule 2 of the AMLA and are therefore subject to AML/CFT requirements. Uganda has mostly addressed the identified deficiencies against Criteria 15.8 and 15.9, Partly Met Criteria 15.10 and 15.11 and Not Met Criteria 15.1, 15.3, 15.4, 15.5, 15.6 and 15.7. It was rated Met with Criterion 15.2 under the 5th FUR. The major deficiencies still outstanding include that Uganda has not identified and assessed the ML/TF risks emerging from VA and VASPs activities, there is no requirement for competent authorities to take necessary legal or regulatory measures to prevent criminals or their associates from holding, or being the beneficial owner of, a significant or controlling interest, or holding a management function in a VASP. ***In view of the remaining deficiencies, the rating for R. 15 should remain as PC.***

3.2.3 Recommendation 21 -Tipping Off and Confidentiality (Originally rated C, to remain C)

43. Under its Second Round MER, Uganda was rated Compliant with the requirements of this Recommendation. Uganda is being re-rated on this Recommendation due to the changes on c.21.2 that were made to the FATF Standards after Uganda's MER was adopted.
44. The Tipping off provisions as set out in S.117(2) of the AMLA have exceptions to allow for information sharing within financial groups as required under Recommendation 18. The section states that these provisions do not apply if the disclosure is made to a court, competent authority or any other person authorised by law. Since financial groups are required to have policies and procedures for sharing information (S.6 (17)-(19) of the AML (Amendment) Act), compliance with this requirement would not constitute tipping off.

Weighing and Conclusion

45. Uganda was assessed as compliant with Rec 18 in the 2nd MER. The tipping off provisions have exceptions to cover information sharing within members of financial groups. ***The rating therefore remains Compliant.***

IV. CONCLUSION

46. Uganda has made significant overall progress in resolving the technical compliance shortcomings identified in its MER and ratings for 2 Recommendations have been revised. The jurisdiction has largely addressed the deficiencies in respect of Recommendations 2 and 14 (both initially rated PC) and the reviewers recommend to upgrade the ratings for the Recommendations with Largely Compliant (LC).

Reviewers have also evaluated information provided in support of the request for re-rating of Recommendations 8 (initially rated NC) and 15 (initially rated PC). However, while the steps taken to address the deficiencies have been noted, the information currently provided does not indicate that the country has made sufficient progress to warrant re-rating. On this basis, it was agreed that the ratings for these Recommendations should remain as they are. A review was further made on the revised requirements of Recommendation 21 (originally rated C) and it was agreed to retain the rating C.

47. Given the progress made since adoption of its MER, Uganda’s technical compliance with the FATF Recommendations has been revised as shown in the table below:

Table 2. Technical compliance following revision of ratings, September 2021

Recommendation	R2	R8	R14	R15	R21
Previous Rating	PC	NC	PC	PC	C
Re-rated to	LC	NC (No rerating)	LC	PC (No rerating)	C

Note: Four technical compliance ratings are available: compliant (C), largely compliant (LC), partially compliant (PC), and non-compliant (NC).

48. Overall, in light of the progress made by Uganda since the adoption of its MER, the re-ratings for its technical compliance with the FATF Recommendations should be considered and approved by the ESAAMLG Task Force of Senior Officials Plenary as follows:

Table 3. Technical compliance following revision of ratings after the adoption of the Uganda MER

R 1	R 2	R 3	R 4	R 5	R 6	R 7	R 8	R 9	R 10
PC	LC	C	LC	C	C	NC	NC	C	LC
R 11	R 12	R 13	R 14	R 15	R 16	R 17	R 18	R 19	R 20
C	PC	C	LC	PC	C	C	C	PC	C
R 21	R 22	R 23	R 24	R 25	R 26	R 27	R 28	R 29	R 30
C	PC	LC	NC	NC	NC	PC	NC	C	PC

R 31	R 32	R 33	R 34	R 35	R 36	R 37	R 38	R 39	R 40
<i>LC</i>	<i>C</i>	NC	PC	<i>LC</i>	C	PC	PC	NC	PC

Note: Four technical compliance ratings are available: compliant (C), largely compliant (LC), partially compliant (PC), and non-compliant (NC). Re-ratings in **red italics** for December 2020.

49. Uganda will remain in enhanced follow-up and will continue to inform the ESAAMLG of the progress made in improving and implementing its AML/CFT measures.