

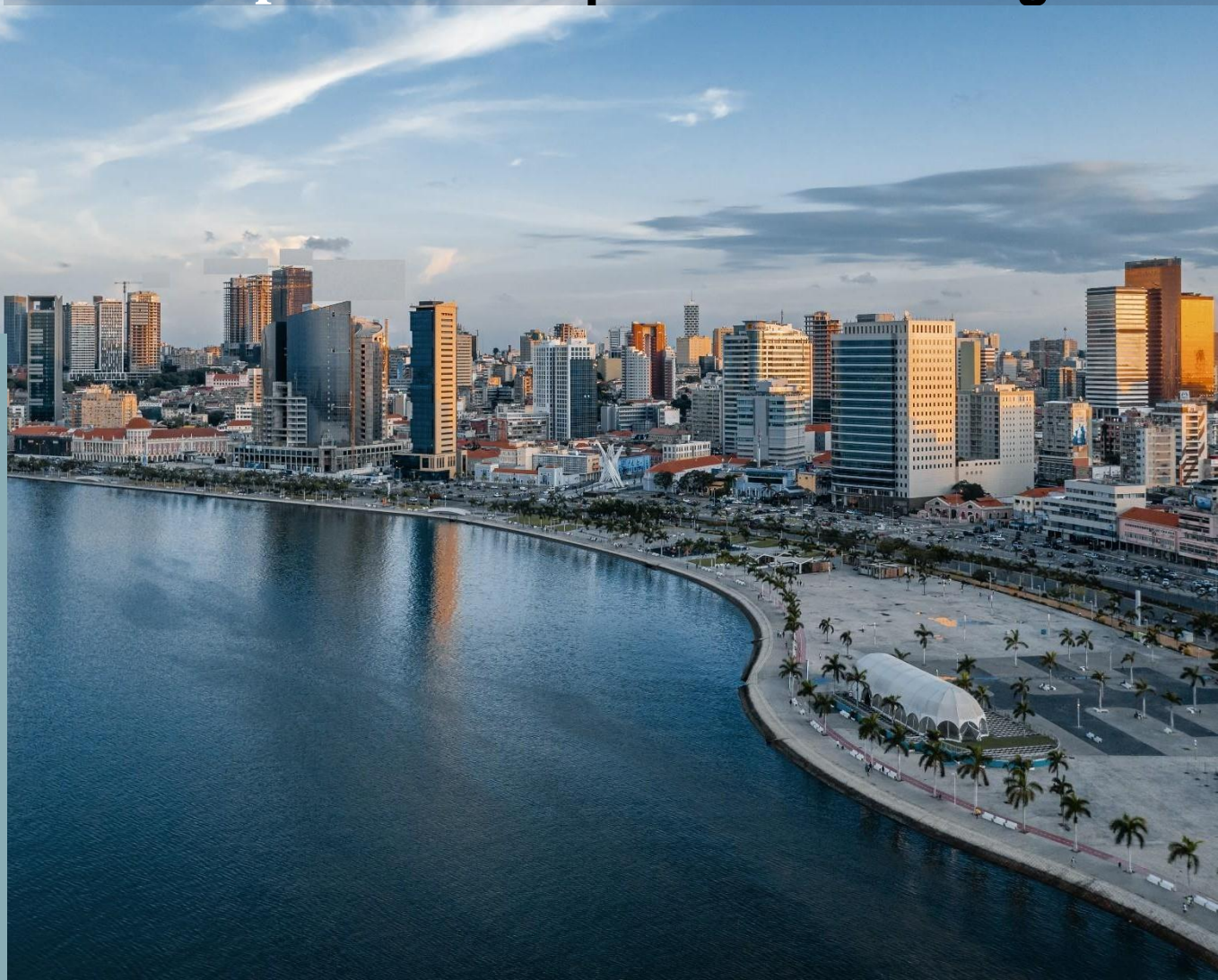


# Anti-money laundering and counter-terrorist financing measures

# Angola

1<sup>st</sup> Enhanced Follow-Up Report & 1<sup>st</sup>  
Technical Compliance Re-rating  
April 2025

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 21 countries and also includes a number of regional and international observers such as AfDB, 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](http://www.esaamlg.org)

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**This report was approved through a written process by the ESAAMLG Task Force of Senior Officials in April 2025.**

Citing reference:

ESAAMLG (2025), *Anti-money laundering and counter-terrorist financing measures – Angola, 1st Enhanced Follow-up Report & 1st Technical Compliance Re-Rating*, ESAAMLG, Dar es Salaam <http://www.esaamlg.org>

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## ANGOLA: 1<sup>st</sup> ENHANCED FOLLOW-UP REPORT & 1<sup>st</sup> REQUEST FOR RE-RATING

### I. INTRODUCTION

1. The Mutual Evaluation Report (MER) of Angola was adopted by the Task Force Plenary in March 2023, having been approved by the Council of Ministers through a Round Robin Process and passing the Post Plenary Global Network Review, and published on the ESAAMLG website on 17 June 2023. This follow-up report assesses the progress made by Angola to resolve the technical compliance shortcomings identified in its MER. New ratings are given when sufficient progress has been made. In general, countries are expected to have corrected most or all of their technical compliance shortcomings by the end of the third year of follow-up at the latest. This report does not cover the progress made by Angola in improving its effectiveness. Progress in this area will be assessed as part of a subsequent follow-up assessment. If sufficient progress has been made, the Immediate Outcome ratings may be reviewed.

### II. KEY FINDINGS OF THE MUTUAL EVALUATION REPORT

2. The MER<sup>1</sup> gave Angola the following technical compliance ratings:

**Table 1. Technical compliance ratings<sup>2</sup>, June 2023**

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

3. In the light of these results, Angola was placed in the enhanced follow-up process.<sup>3</sup>

### OVERVIEW OF PROGRESS IN TECHNICAL COMPLIANCE

4. Subsequent to the adoption of the 2023 MER, Angola has submitted its first FUR with requests for re-rating and taken measures aimed at addressing the technical compliance deficiencies identified in its MER.

<sup>1</sup> Mutual Evaluation Report (MER) on Angola June 2023, <https://www.esaamlg.org/reports/Angola%20MER-%20June%202023.pdf>

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

<sup>3</sup> 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.

5. This section of the report summarises progress made by Angola to improve its technical compliance by addressing the TC deficiencies identified in its MER.
6. ESAAMLG welcomes the steps that Angola has taken to improve its technical compliance with Recommendations 5 and 16. Following this progress, Angola has been re-rated with the two Recommendations.

### **3.1.1 Recommendation 5 – Terrorist Financing Offence (Rerated from PC to LC)**

7. The main shortcomings identified in the MER was that: (a) Angola’s legal framework did not provide the ability to infer intent and knowledge through objective factual circumstances. Neither Law 19/17 nor Law 5/20 specifically stipulated that intent and knowledge could be inferred through objective factual circumstances; (b) the financing of travel of an individual had a minimum sentence of 3 months and could not be treated as a predicate offence; (c) Angolan law precludes parallel civil or administrative proceedings when a criminal case is being pursued (Law 5/20, Article 76, paragraph 2); and (d) Angola could not pursue a conviction in absentia with a follow-on request for extradition.
8. Angola has amended its laws. Under Law 19/17, Article 26(3) (as amended) the intent and knowledge required to prove the offence can be inferred from objective factual circumstances. *Thus, the rating for C5.5 is considered Met.*
9. Angola has a sentencing range of 5-15 years for TF. Law 19/17, Article 29 (as amended) provides a penalty of imprisonment ranging from 6 months to 5 years for financing of travel of individuals. The law 19/17– Law on the Prevention and Combat of Terrorism, has been amended. Now Article 29 provide a new minimum threshold for financing of travel of an individual offence (6 months and maximum 5 years). The new amendment meets the threshold of proportionality and dissuasiveness of sanctions against natural persons convicted of TF. *Thus, the rating for C5.6 is considered Met.*
10. The authorities have not demonstrated the measures they have taken to address the deficiency in Law 5/20, Article 76 (2) which precludes parallel civil or administrative proceedings when a criminal case is being pursued. *Thus, the current rating of Partly Met for C5.7 is retained.*
11. Law 19/17, Article 29 (1) and (2) provides a penalty for the financing of travel of an individual which ranges from a minimum of 6 months to a maximum of 5 years. All crimes with a penalty exceeding 6 months are considered predicate offences. *Thus, the rating for C5.9 is considered Met.*
12. The authorities have not demonstrated the measures they have taken to address the deficiency in Law 19/17, Article 2 (applicable to facts practiced abroad) which is limited to persons “found in Angolan territory,”. Therefore, Angola cannot pursue a conviction in absentia with a follow-on request for extradition. *Thus, the current rating of Partly Met for C5.10 is retained.*

### **Weighting and Conclusion**

13. During the reporting period, Angola addressed the deficiencies identified in the MER on C5.5, 5.6 and 5.9. So far, the Angolan authorities have not demonstrated that action has been taken to address the deficiencies identified in C5.7 and 5.10 and therefore the reviewers’ conclusion is that

these criteria have not been addressed. The Reviewers considered the remaining shortcomings minor and therefore recommend that *Angola's rating for R.5 be upgraded from PC to LC.*

### **3.1.2 Recommendation 16 – Wire transfers (Rerated from PC to C)**

14. The main shortcomings identified in the MER were: (a) lack of guidance to FIs on implementation of targeted financial sanctions related to designations made subject to UNSCR 1267 and 1373, and lack of mechanisms for communicating UNSC listings and removal to FIs; (b) lack of legal provisions for cross border wire transfers in batched files to contain required originator and beneficiary information; and (c) lack of requirements for intermediary FIs.
15. Law 11/24, Article 30(4) provides that where several individual cross-border electronic transfers from a single payer/originator are aggregated into batches for transmission to payees, each batch shall contain the necessary and accurate information on the originator, as well as all information on the payee, which is fully traceable in the beneficiary country, including the originator account number pursuant to para 1 of Article 30(4) law 11/24. *Thus, the rating for C16.2 is considered Met.*
16. Law 11/24, Article 30(7) requires the sending FIs to ensure that all originator and beneficiary information that accompanies a wire transfer is retained with it. *Thus, the rating for C16.9 is considered Met.*
17. Article 30(13) of Act No.11/24 (as amended) requires intermediary FIs to have risk-based policies and procedures and determine appropriate follow up actions [Art.30(13)(b)]. *Therefore, c16.12 is Met.*
18. Law 11/24, Article 31(1) mandates beneficiary FIs to take appropriate measures to identify cross-border electronic transfers that lack the necessary information on the payer or beneficiary. *Thus, the rating for C16.13 is considered Met.*
19. Law 11/24, Article 30(15) provides an obligation for FIs to adopt freezing measures and comply with prohibitions from conducting transactions with persons, groups and entities designated by the UN Security Council for terrorism financing. *Thus, the rating for C16.18 is considered Met.*

### **Weighting and conclusion**

20. Angola has addressed all the deficiencies identified in the MER on Recommendation 16. The Reviewers therefore recommend that *Angola's rating for R.16 be upgraded from PC to C.*

## **IV. CONCLUSION**

21. Angola has made significant overall progress in resolving the technical compliance shortcomings identified in its MER, and the ratings for 2 Recommendations have been revised. The jurisdiction has addressed the deficiencies in respect of Recommendations 5 (PC), and 16 (PC). The reviewers recommend upgrading the rating for R5 with Largely Compliant (LC) and R16 with Compliant (C).
22. Given the progress made since adoption of its MER, Angola's technical compliance with the FATF Recommendations has been revised as shown in the table below:

**Table 2. Technical compliance following revision of ratings, March 2025**

<b>Recommendation</b>	<b>R5</b>	<b>R16</b>
<b>Previous Rating</b>	PC	PC
<b>Re-rated to</b>	LC	C

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

23. Overall, considering the progress made by Angola 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 Angola MER, March 2025**

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

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

24. Angola 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.