

Anti -money laundering and Counter -terrorist financing measures

ZAMBIA

**7th Enhanced Follow-up Report and
4th Technical Compliance Re-Rating**

September 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 Commonwealth Secretariat, East African Community, FATF, GIZ, IMF, SADC, United Kingdom, 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.

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ZAMBIA'S 7th ENHANCED FOLLOW-UP REPORT & 4th REQUEST FOR RE-RATING

I. INTRODUCTION

1. The Mutual Evaluation Report (MER) of Zambia was adopted by the Task Force and approved by the Council of Ministers in June 2019¹. According to the MER, Zambia was Compliant (C) on 11 Recommendations, Largely Compliant (LC) on 17 Recommendations, Partially Compliant (PC) on 11 Recommendations and Non-Compliant (NC) on one Recommendation. Out of the 11 Immediate Outcomes (IOs), Zambia was rated Moderate Level of Effectiveness on 9 IOs and Low Level of Effectiveness on 2 IOs. Details of the MER ratings are provided in Table 2.1. This follow-up report (FUR) assesses the progress made by Zambia to resolve the technical compliance shortcomings identified in its MER.
2. The assessment of Zambia's request for technical compliance re-ratings and the preparation of this report was undertaken by the following experts: Mr Evans Siziba (Zimbabwe); Mr. Toka Mashoi (Lesotho); Ms. Motšeng Tšolo (Lesotho); Paulo Munguambe (Mozambique); Ms Julia Tloubatla (South Africa); Ms Nokwazi Mtshali (South Africa) and Ms Cynthia Ngwane (South Africa). The Reviewers were supported by the following ESAAMLG Secretariat Experts: Valdane Joao, Vanevola Otieno, Catherine Ampairwe and Tom Malikebu.
3. Section III of this report summarises the progress made by Zambia on technical compliance. Section IV sets out conclusions and contains a table of Recommendations for which a new rating has been given.

II. KEY FINDINGS OF THE MUTUAL EVALUATION REPORT

4. The MER rated Zambia's technical compliance ratings as set out in Table 2.1 below. Considering these results, Zambia was placed in the enhanced follow-up process.

Table 2.1. Technical compliance ratings² April 2019

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

¹ <https://www.esaamlg.org/reports/MER%20Zambia-June%202019.pdf>

² There are four possible levels of technical compliance: compliant (C), largely compliant (LC), partially compliant (PC) and non-compliant (NC).

III. OVERVIEW OF PROGRESS IN TECHNICAL COMPLIANCE

3.1 Progress in addressing the technical compliance deficiencies identified in the MER/FUR

5. Since the adoption of its MER in April 2019, Zambia has taken measures aimed at addressing the technical compliance deficiencies identified in its MER. This section of the report summarises progress made by Zambia to improve its technical compliance by addressing the TC deficiencies identified in its MER.
6. ESAAMLG welcomes the steps that Zambia has taken to improve its technical compliance deficiencies.

3.1.1 Recommendation 5: Terrorist Financing Offence (Previously rated PC, now re-rated to C)

	Year	Rating
MER	2019	LC
FUR.1	2022	PC (downgraded)
FUR.2	2023	PC (no re-rating requested)
FUR.3	2024	PC (not re-rated)
FUR.4	2025	C (re-rated from PC)

7. In its 3rd FUR, Zambia was rated Partially Compliant (PC) with the requirements of Recommendation 5 because Zambia's legal framework, while criminalizing terrorist financing for general acts under Article 2(1)(b) of the Terrorist Financing Convention, contained three critical gaps. First, it failed to explicitly incorporate offenses from UN counter-terrorism treaties listed in the Second Schedule, as required under Article 2(1)(a). Second, the legislation inconsistently limited its TF offense to 'terrorist acts' rather than adopting the Act's broader 'terrorism' definition. Third, the framework neither addressed institutional support to terrorist organizations nor criminalized financing for foreign terrorist fighter travel.
8. **Criterion 5.1 – (Met)** The 3rd FUR rated this criterion as 'Partly Met' as Zambia's legal framework, while criminalizing terrorist financing for general acts under Article 2(1)(b) of the Terrorist Financing Convention, excluded offenses under UN treaties listed in the Second Schedule limited its TF offense to 'terrorist acts' rather than the Act's broader 'terrorism' definition; and did not address institutional support to terrorist organizations or foreign fighter travel financing.
9. Zambia subsequently amended the Anti-Terrorism and Non-Proliferation Act which now criminalises terrorism financing (TF) offenses in a manner consistent with Article 2 of the International Convention for the Suppression of the Financing of Terrorism.

10. Section 20(1) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024 establishes the legal basis prohibiting a person from committing a TF offence. Based on this section as read together with the definition of "Terrorism Financing" under Section 2 of the same Act, Zambia has criminalised TF. It is an offence to willfully provide or collect funds or other assets by any means, directly or indirectly, with the intention that those funds or other assets be used, or in the knowledge that they are to be used, in full or in part to carry out a terrorist act or by a terrorist or by a terrorist organisation, even in the absence of a link to a specific act or acts of terrorism. In addition, the definition of the TF offence includes an offence within the scope of and as defined the applicable treaties listed in the Second Schedule. The list includes all treaties contained in the Annex of the TF Convention. This essentially means that all activities covered by the Conventions and Protocols in the Annex to the TF Convention have been criminalised. The funding of these activities can be pursued as a TF offence. Hence Zambia has criminalised TF consistent with Article 2(1)(a) of the TF Convention.
11. Furthermore, the definition of terrorism financing under section 2 of the Anti-Terrorism and Non-Proliferation Act No. 30 of 2024 includes carrying out any other act intended to cause death or serious bodily injury to a civilian, or to any other person not taking an active part in the hostilities in a situation of armed conflict, when the purpose of such act, by its nature or context, is to intimidate a population, or to compel a government or an international organisation to do or to abstain from doing any act. This is consistent with the provisions of Article 2(1)(b) of the TF Convention. **Hence, c.5.1 is rated Met.**
12. **Criterion 5.2 – (Met) The 3rd FUR rated this criterion as Met** based on section 2(1) and section 20 of the Anti-Terrorism and Non-Proliferation Act 2018, as amended in 2023. Zambia still criminalises TF in section 20(1) of the Act. However, due to the amendments to the definition of TF, the requirements of this criterion are now contained in Sections 2(c) and 2(d) (1) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024. Hence, Section 20 as read together with the definition of TF in these subsections, Zambia still criminalizes the willful provision or collection of funds, directly or indirectly, with either intention or knowledge they would be used for terrorism; covering both specific terrorist acts and general support to terrorist organizations without requiring linkage to particular acts; and establishing these as standalone offenses rather than being considered as aiding/abetting. Additionally, the 2024 amendments cover funds used "to carry out terrorism" (Section 2(c)) and those provided to "a terrorist or terrorist organization" regardless of specific acts (Section 2(d)). **Hence c.5.2 is still rated Met.**
13. **Criterion 5.2^{bis} - (Met) The 3rd FUR of Zambia rated this criterion as Met.** Zambia has further strengthened the definition of TF. The requirements of this criterion are now contained in Section 2(e) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024. Zambia now criminalizes the travel of a person to a state other than their state of residence or nationality for the purpose of perpetrating, planning, preparing for, or participating in acts of terrorism, or for providing or receiving terrorist training through Section 20(1) as read together with subsection 2(e). **Hence c5.2bis is still rated Met.**

14. **Criterion 5.3 –(Met)- The 3rd FUR of Zambia rated this criterion as Met** based on section 20(1) r/w section 2(1) of the Anti-Terrorism and Non-Proliferation Act, No. 6 of 2018, as amended in 2023. Subsequent to the publication of the report, Zambia amended the law. The requirements of this criterion are now addressed in Section 20(4) the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024, and the text has remained the same. In accordance with this Section terrorism financing extends to any funds or other assets, whether from a legitimate or illegitimate source. **Hence, c.5.3 is still rated Met.**
15. **Criterion 5.4 –(Met)- The 3rd FUR of Zambia rated this criterion as Met** based on section 20(4) of the Anti-Terrorism and Non-Proliferation Act No. 6 of 2018, as amended in 2023. Subsequently, Zambia amended the law but maintained the text of the provisions. The requirements of this criterion are now addressed in Section 20(4)(c) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024. The sections provides that the TF offence does not require that (a) funds or other assets were actually used to commit or attempt to commit terrorism, (b) linked to a specific act of terrorism. **Hence, c.5.4 is still rated Met.**
16. **Criterion 5.5 – (Met)- The 2019 MER rated this criterion as Met** based on the cases which were provided to prove that intent is a key ingredient of the offence of TF. Since the text of the criterion has not changed, c.5.5 remains ‘Met’. **Hence, c.5.5 is still rated Met.**
17. **Criterion 5.6 – (Met)- The 3rd FUR rated this criterion as Met** based on section 20 (5) of the Anti-Terrorism and Non-Proliferation Act No. 6 of 2018, as amended which provided that natural persons convicted of TF are liable to life imprisonment. Subsequent to this FUR, Zambia has amended this legislation in 2024 which provides for the same sanctions in s.20(3). In accordance with Section 20(3)(a) of the Anti-Terrorism and Non-Proliferation Act No. 6 of 2018 (as amended), natural persons convicted of terrorism financing (TF) are liable to life imprisonment. Section 4 of the Anti-Terrorism and Non-Proliferation Act No. 6 of 2018 prohibits a judge from imposing a lesser sentence for TF or any other terrorism related offence where the penalty is life imprisonment. **Hence, c.5.6 is still rated Met.**
18. **Criterion 5.7 – (Met)- The 3rd FUR rated this criterion as Met** based on Section 74 of the Anti-Terrorism and Non-Proliferation Act, No. 6 of 2018, as amended in 2023 which provides that a legal person who commits a TF offence is liable, on conviction to a fine of one million penalty units (equivalent to ZMW 400,000 or about USD 15,385). Subsequent to this FUR, Zambia amended this legislation in 2024 which in section 72A(1) provides that legal person who commits any offence under this Act shall be liable to one or more of the following civil or administrative sanctions and the civil or administrative proceedings shall not preclude parallel criminal proceedings: (a) dissolution of the legal person; (b) subject to the Forfeiture of Proceeds Crime Act, 2010, forfeiture of funds or other assets; (c) a directive to take remedial action or to make specific arrangements to redress the identified non-compliance; (d) the restriction or suspension of certain specified business activities; and (e) a penalty not exceeding thirty million penalty units (ZMK 75 million or about USD 2.68 million).

19. In addition, 72B(1) provides that a legal person that commits an offence under this Act for which a penalty has not been provided is liable, on conviction, to— (a) a fine of not less than twenty million penalty units but not exceeding one hundred million penalty units (ZMK 8-40 Mil); or (b) dissolution subject to the Companies Act, 2017, where the legal person was created with the exclusive or predominant purpose of intention of committing the crime or when the repeated criminal practice shows that it is being used for that purpose by those in a managerial position within the legal person. **Hence, c.5.7 is still rated Met.**
20. **Criterion 5.8 –(Met-) The 2019 MER rated this criterion as Met** based on s.20 (1) and (4) of the ATA, 2007, and S.21 and 22 of the Penal Code Act. The ATA was replaced by Anti-Terrorism and Non-Proliferation Act, No. 6 of 2018, which also included the same provisions in Sections 31(1) and (2) of the Anti-Terrorism and Non-Proliferation Act, No. 6 of 2018 as amended. These sections were confirmed, and the rating was maintained as Met. The Act has been amended again and in terms of 20(2) of the Anti-Terrorism and Non-Proliferation Act (as amended), it is an offence to: (a) attempt to carry out terrorism financing; (b) participate as an accomplice in terrorism financing or attempted terrorism financing; (c) organise or direct others to commit terrorism financing or attempted terrorism financing; or (d) contribute to the commission of terrorism financing or attempted terrorism financing by a group of persons acting with a common purpose. **Hence, c.5.8 is still rated Met.**
21. **Criterion 5.9 – (Met)- The 3rd FUR rated this criterion as Met** based on S.20 of the Anti-Terrorism and Non-Proliferation Act, No. 6 of 2018 (as amended by the Anti-Terrorism and Non-Proliferation Act No .6 of 2023) which renders TF as a predicate offence of money laundering. Subsequent to this, the Act was amended in 2024 which also designates TF as a predicate offence to ML as per section 20(4)(a) of the Anti-Terrorism and Non-Proliferation Act (as amended). **Hence, this criterion remains Met.**
22. **Criteria 5.10 – (Met)- The 3rd FUR rated this criterion as Met** based on Section 3(2) of the Anti-Terrorism and Non-Proliferation Act, No. 6 of 2018, as amended. A person who commits an offence outside Zambia which, if wholly done within Zambia, would be an offence against this Act, may be tried and punished under this Act in the same manner as if that act had been wholly done within Zambia. Subsequent to the FUR, the Act was amended, and section 20(4)(d) of the Anti-Terrorism and Non-Proliferation Act (as amended) provides that terrorism financing applies, regardless of whether the person alleged to have committed the offence is in the Republic or a different country from where the terrorist or terrorist organization is located, or the offence occurred or shall occur. **Hence, c.5.10 is still rated Met.**

Weighting and conclusion

23. Since its 3rd FUR with re-rating, in September 2024, Zambia has amended its Anti-Terrorism and Non-Proliferation Act, No. 6 of 2018 to address all the outstanding deficiencies. The Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024

comprehensively addresses all aspects of terrorist financing criminalization, including treaty-based offenses, organizational support, and foreign fighter financing. Criminalisation of terrorism financing is now consistent with Article 2(1) (a) and (b) of the UN TF Convention. **Based on the above, Rec.5 is re-rated from Partially Compliant to Compliant.**

3.1.2 Recommendation 6: Targeted Financial Sanctions Related to Terrorism and Terrorist Financing (Previously rated PC, now re-rated to C)

	Year	Rating
MER	2019	PC
FUR 1	2022	PC no re-rating request
FUR 2	2023	PC no rerating request
FUR 3	2024	PC (Not re-rated)
FUR 4	2025	C (re-rated from PC)

24. **Criterion 6.1 –(Met)-The 3rd FUR rated c.6.1 Mostly Met** based on Regulations 3 and 7 of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. Subsequent to this, Zambia introduced a new Act and Regulations, and the sub-criteria are now addressed as indicated below:

- (a) **-(Met)- The 3rd FUR rated this criterion as Met** based on s.43 of the Anti-Terrorism and Non- Proliferation Financing Act 2018. Zambia has amended the Act in 2024, and the requirements of this criterion are addressed by s.45(2) which provides that the Minister responsible for national security is the competent authority for proposing persons or entities for designation to the 1267/1989 Committee, as well as to the 1988 Committee for designation. **Hence, this sub-criterion remains Met.**
- (b) **-(Met)- The 3rd FUR rated this criterion as Met** based on Regulation 3 of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024) and s.43(1) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 6 of 2023). The section has since been repealed. The requirements of this criterion are addressed through Section 6(2)(b) of the Anti-Terrorism and Non-Proliferation (Amendment) Act, No. 30 of 2024 which empowers the FIC to collect or solicit information to identify a person, group or entity that, based on reasonable grounds, or a reasonable basis to suspect or believe, meets the criteria for designation or national listing. Furthermore, s.61 of the Act confers powers on the FIC to use special investigative techniques for identifying targets for designations. Guideline 8.2(c) of the National Anti-Terrorism Centre Guidelines on the Implementation of

Targeted Financial Sanctions on Terrorism and Proliferation Financing also provides that the Minister shall identify targets for designation based on the designation criteria set out in the relevant United Nations Security Council resolutions (UNSCRs). **Hence, this sub-criterion remains Met.**

- (c) **-(Met)-** The 3rd FUR rated this criterion as Mostly Met as Zambia applied the 'reasonable grounds' standard for UN sanctions designations under Regulation 3(b) of its UNSCR Implementation Regulations, but the statutes were not explicit that such designations were independent of criminal proceedings. This deficiency has now been remedied through Section 45(3) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024, which states that designation proposals "shall be made *ex parte* and shall not be conditional on the existence of criminal proceedings. The 'reasonable grounds' standard has been maintained under (Section 6(2)(b)). **Consequently, this sub-criterion is now considered Met.**
- (d) **-(Met)-** The 3rd FUR rated this criterion as Met based on Regulation 7(1) of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024). Subsequent to this, Zambia amended the Act and introduced Section 45 (4) which states that the Centre shall follow the standard forms and procedures when making proposals for designations to the relevant UNSC Sanctions Committees (Section 45(4)(c) as amended in Act No. 30 of 2024. **Hence, this sub-criterion remains Met.**
- (e) **-(Met)-** The 3rd FUR rated this criterion as Met based on Regulation 7(1) of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024). The Regulation has not changed. In addition, s.43(2) of the Anti-Terrorism and Non-Proliferation (Amendment) Act, No. 30 of 2024 provides that the submission prepared by the Minister responsible for national security should provide as much relevant information as possible on the proposed name, along with a statement of case outlining the basis for the designation proposal. Furthermore, upon submitting the proposal, the Minister may indicate whether Zambia's status as a designating state can be disclosed. [Regulation 7(1) of Statutory Instrument No. 1 of 2024]. **Hence, this sub-criterion remains Met.**

25. **Overall, based on the foregoing, criterion 6.1 is rated as Met.**

26. **Criterion 6.2 – (Met-) The 3rd FUR rated c.6.2 as Mostly Met** based on section 43(1) of the Anti-Terrorism and Non-Proliferation Act, No. 6 of 2018, as amended and Regulations 3, 4 and 5 of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations 2024. Subsequent to this, Zambia introduced a new Act and Regulations as indicated below in relation to designations pursuant to 1373:

- (a) **-(Met)- The 3rd FUR rated this criterion as Met** based on s.43(1) of the Anti-Terrorism (national listing) and Proliferation Finance 2018 (as amended) and

Regulation 4 (third party requests for listing). Under Sections 43(1) and 44(1), as amended by Act No. 30 of 2024, the Minister responsible for national security is the competent authority for proposing persons or entities that meet the specific criteria for designation, as set forth in UNSCR 1373 as put forward either on the country's own motion or at the request of another country.

Hence, this sub-criterion remains Met.

- (b) **-(Met)- The 3rd FUR rated this criterion as Met** based on Regulation 3 of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. Reg. 3(1) provides that the Minister, shall on the recommendation of the Centre, nationally list a person, group or entity. Furthermore, reg.3(1)(b)(i) provides that the Centre shall recommend a person or entity to the Minister where, based on information received, it has reasonable grounds to believe that a person, group or entity is engaged in terrorism, terrorism financing or proliferation financing. **Hence, this criterion remains Met.**
- (c) **-(Met)- The 3rd FUR rated this criterion as Met** based on Regulations 3(b), 4(5) and 4(6) of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. The requirements of this criterion are now set out in Regulation 4(1)-(6). Under Section 4(1), the Attorney General, upon receiving a request from a foreign state for the listing of a person, group, or entity, must submit the information to the Minister without delay, in accordance with Section 4(3). Furthermore, Section 4(4) requires the Minister to forward the request to the Center without delay. The Center must then assess, without delay, whether there are reasonable grounds for the national listing of the person, group, or entity, as stipulated in Section 4(5). Finally, under Section 4(6), the Center must make a recommendation to the Minister on whether to propose or reject the listing. The Act defines 'without delay' as within twenty-four hours. **Hence, this sub-criterion remains Met.**
- (d) **-(Met)- The 3rd FUR rated this criterion as Mostly Met** as Regulation 3(1)(b) and Regulation 4(9) of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024, provide for the application of the 'reasonable grounds to believe' standard vide Regulation 3(1)(b) and confirm that designations are not conditional upon criminal proceedings vide Regulation 4(9).. Subsequent to the FUR, Zambia introduced section 6(2)(b) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No.30 of 2024 which provides for an evidentiary standard of proof of 'reasonable grounds' or 'reasonable basis' when deciding whether to make a designation. Section 44(9)(b) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No.30 of 2024 further

provides that designations remain administrative measures independent of judicial processes; and formally adopt all UN Committee procedures and forms. **Consequently, this sub-criterion is now re-rated Met.**

- (e) **-(Met)- The 3rd FUR rated this criterion as Met based** on Regulation 5 of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. Subsequent to the FUR, Zambia has also introduced Section 66(1), as amended by Act No. 30 of 2024, which requires Zambia to request another country to give effect to actions initiated under the freezing mechanisms. When making such a request, Zambia must provide as much identifying information and specific supporting details for the designation as possible.

27. **Overall, based on the foregoing, criterion 6.2 is re-rated as Met.**

28. **Criteria 6.3 – (Met)- The 3rd FUR rated c.6.3 as Met** based on section 6(2) and 43 of the Anti-Terrorism and Non-Proliferation Act, No. 6 of 2018, as amended and Regulation 3 of the Statutory Instrument No 1 of 2024. Subsequent to this, Zambia introduced a new Act and Regulations, and the sub-criteria are now addressed as indicated below:

- (a) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on s.6(2) of the Act and Regulation 3 of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. The texts of the Act and Regulations have not changed. Under Section 6(2)(b) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024, the Center has the necessary authority to collect or solicit information to identify a person, group, or entity that, based on reasonable grounds or a reasonable basis to suspect or believe, meets the criteria for designation or national listing. **Hence, the sib-criterion remains Met.**
- (b) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on s.43 of the Act and Regulation 3 of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. Following the amendment of the Act, Section 44(9)(b) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024, it has been expressly stated that designation is carried out ex-parte against a person or entity whose designation proposal is under consideration. **Hence, this sub-criterion remains Met.**

29. **Criteria 6.4 – (Met)- The 3rd FUR rated c 6.4 as Partly Met** because there were no statutory timelines governing the Minister's receipt of United Nations Security Council designations or the Minister's transmission of those designations to the Centre which led to gaps in ensuring "without delay" (24-hour) freezing. The relevant laws have since been amended.

30. Zambia has amended the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024. Section 45(1) provides that the UN sanctions list shall take effect in Zambia immediately after a designation is made by the relevant UN Sanctions Committee. To implement this requirement, the National Anti-Terrorism Center has subscribed to the UN mailing list. As a result, the Center receives designations immediately after they are made. In relation to UNSCR 1373, Section 43 provides that the Minister shall, on the recommendation of the Centre, nationally list a person, group or entity as prescribed in accordance with the United Nations Security Council Resolution 1373. Furthermore, sections 43(3)(a) and 46 provide that the Centre shall communicate the national listing (once the Minister has issued that list) or the relevant United Nations sanctions list, without delay to reporting entities, supervisory authorities, state institutions, or any other affected persons or entities, including virtual asset providers, for immediate implementation as prescribed. By defining “without delay” as the implementation of targeted financial sanctions within twenty-four hours of designation, the Act establishes a single, uninterrupted twenty-four-hour window in which notifications and asset freezes must occur. The daily-monitoring clause in Section 45(4) is a backstop against technical failures that does not interrupt this continuous timeframe. As a result, from the exact moment the Minister issues a national list or UN publishes a designation—now no longer routed through ministerial transmission—through receipt by the Centre, notification and final freezing by reporting entities, Zambia completes the entire process within twenty-four hours.
31. Furthermore, Section 5.1 of the National Anti-Terrorism Centre Guidelines on the Implementation of Targeted Financial Sanctions for Terrorism and Proliferation Financing outlines the required dissemination timeframe, specifying that the Center must disseminate the national list or UN list within seven hours, and the relevant recipients must scan their databases, take freezing action (where necessary) and report back to the Centre within sixteen hours. The guidelines are binding on all addresses as provided in section 72D (3) and are subject to penalties for non-compliance. **Hence, c6.4 is re-rated as Met.**
32. **Criteria 6.5 –(Met) – The 3rd FUR rated c.6.5 as Mostly Met** as the prohibition on making assets available was conditional upon a person’s knowledge or reasonable suspicion that the assets would fund terrorist or proliferation activity, applied only to “funds” (excluding other assets), and did not explicitly cover assets owned, controlled, derived, or held on behalf of designated persons or entities. Based on the new laws, this criterion is assessed as follows.
- (a) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on s.43A of the Anti-Terrorism and Non-Proliferation (Amendment) Act, 2024 and Regulation 10(1) of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. Subsequent to this, Zambia amended that Act. Under Section 47(1) of the Anti-

Terrorism and Non-Proliferation Act 2024, Zambia requires all natural and legal persons within the country to freeze, without delay and without prior notice, the funds or other assets of designated persons and entities. According to section 3 of the Interpretation and General Provisions Act, the term ‘person’ includes both natural and legal person. In addition, Guideline 5.1(e) of the National Anti-Terrorism Centre Guidelines on the Implementation of Targeted Financial Sanctions on Terrorism and Proliferation Financing, 2025 requires persons and entities to implement the TFS within 16 hours *hence this sub-criterion remains Met.*

- (b) **-(Met)-The 3rd FUR rated this sub-criterion as Met** based on Regulation 10(1) of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. Zambia has amended 47(1) of the Anti-Terrorism and Non-Proliferation (Amendment) Act in 2024 and introduced s 47(1)(a)(i) which provides that a reporting entity shall freeze all funds or other assets, that are owned or controlled by the nationally listed person, group or entity, or designated person or entity, and which are not necessarily tied to a particular act, plot or threat of terrorism or proliferation. This provision addresses the requirement.
- i. Criterion 6.5(b)(ii) is addressed by section 47(1)(a)(ii) which provides that freezing extends to funds or other assets, that are wholly or jointly owned or controlled, directly or indirectly, by a nationally listed person, group or entity, or designated person or entity;
 - ii. Criterion 6.5(b)(iii) is addressed by section 47(1)(a)(iii) which provides that freezing extends to the funds or other assets, derived or generated from funds or other assets, owned or controlled directly or indirectly by a nationally listed person, group or entity, or designated person or entity;
 - iii. Criterion 6.5(b)(iv) is addressed by section 47(1)(a)(iv) which provides that freezing extends to funds or other assets, of a person, group or entity acting on behalf of, or at the direction of, a nationally listed person, group or entity, or designated person or entity. *Consequently, this sub-criterion remains Met.*
- (c) **-(Met)- The 3rd FUR rated this sub-criterion as Partly Met** based on Sections 45 and 46 of the Anti-Terrorism and Non-Proliferation (Amendment) Act, 2023. The FUR found that the obligation was conditional upon a natural or legal person having knowledge or reasonable suspicion. In addition, there was no explicit provision which prohibits making funds or other assets to entities owned or controlled by designated persons or entities. Subsequent to this, Zambia introduced amendments to the Act. Under Section 52(1), as amended by Act No. 30 of 2024, of the Anti-Terrorism and Non-Proliferation Act 2024,

any person, group or entity is now prohibited from dealing in funds, other assets, economic resources, or other related resources owned, held or controlled directly or indirectly, wholly or jointly, by or for the benefit of a nationally listed person, group, or entity, or a designated person or entity, an entity owned or controlled, directly or indirectly, by a nationally listed person, group, or entity or a designated person or entity, or a person or entity acting on behalf of, or at the direction of, a nationally listed person, group, or entity, or a designated person or entity, unless licensed, authorised or otherwise notified in accordance with the relevant United Nations Security Council Resolution or by the Centre. *Consequently, this sub-criterion is now Met.*

- (d) **(Met)- The 3rd FUR rated this sub-criterion as Met** based on Sections 43(3) and 43A(1) of the Anti-Terrorism and Non-Proliferation (Amendment) Act, 2023. Subsequent to this, Zambia introduced amendments to the Act. Based on Section 46 (a), as amended by Act No. 30 of 2024, of the Anti-Terrorism and Non-Proliferation Act 2024, the Centre has the responsibility to communicate the national listing or designation made by the Minister or a relevant United Nation Sanctions Committee under sections 43, 44 and 45, without delay, to a reporting entity, supervisory body, State institution, any other person or entity, or a virtual asset service provider, that may be holding targeted funds or other assets in a national newspaper of general circulation or on its website or through electronic mail or any other means. Currently, Zambia uses both the website and emails to communicate national listing or designations. The Sanctions list is posted on the website, and emails are sent to the Centre's mailing list. Furthermore, section 72D (2) provides that the Centre shall issue guidelines relating to the obligations of a reporting entity and other persons or entities, that may be holding targeted funds or other assets in taking action under a freezing mechanism. In January 2025, the National Anti-Terrorism Centre issued guidelines on implementation of targeted financial sanctions on terrorism and proliferation financing. The Guidelines were published through the government gazette and were also posted on the National Anti-Terrorism Centre and the Financial Intelligence Centre's websites. The addressees (people to whom the Guidelines were disseminated include reporting entities, supervisory bodies, state institutions and any other person or entity (including FIs and DNFBPs). *Consequently, this sub-criterion remains Met.*

- (e) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on Sections 43A(2) of the Anti-Terrorism and Non-Proliferation (Amendment) Act, 2023 and Regulation 9(1)(b) of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. After this, Zambia introduced amendments to the Act. Under section 47(1)(b), a reporting entity, supervisory body, State

institution, any other person or entity or a virtual asset service provider are required to report to the Centre and the relevant competent authority on any assets frozen, attempted transactions, or actions taken in compliance with the implementation of targeted financial sanctions related to terrorism, terrorism financing, proliferation and financing, based on Section 46 (a), as amended by Act No. 30 of 2024, of the Anti-Terrorism and Non-Proliferation Act 2024. Hence, the provisions have adequately addressed the requirements. *Consequently, this sub-criterion remains Met.*

- (f) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on Regulation 17(7) of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. After this, Zambia introduced amendments to the Act. Section 48 of the Anti-Terrorism and Non-Proliferation Act 2024 provides measures to protect the rights of bona fide third party acting in good faith when implementing the obligations under targeted financial sanctions under this Act. *Consequently, this sub-criterion remains Met.*

33. **Criterion 6.6 –(Met)- The 3rd FUR rated c.6.6 as Met.** Since then, Zambia introduced new laws which are assessed below in relation to the requirements of this criterion.

- (a) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on Regulations 6 and 13(4) of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. After this, Zambia introduced amendments to the Act. Section 49 (1), as amended by Act No. 30 of 2024, of the Anti-Terrorism and Non-Proliferation Act 2024, provides procedures for the delisting. A person who appears on the United Nations sanctions list or the national list may submit a request for delisting to: the Office of the United Nations Ombudsperson, or to the Focal Point in accordance with the procedures set out in Resolution 1730 (2006) of the United Nations Security Council or any other subsequent or future Resolution; or (ii) to the Minister accompanied by supporting information and documents. Hence, *this sub-criterion remains Met.*
- (b) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on Regulations 6, 12(1) and 13(1) of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. After this, Zambia introduced amendments to the Act and maintained that text of the Regulations. Regulation 12(1(a)) of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations 2024, the Centre shall make a recommendation to the Minister for the de-listing of a person, group or entity where that person,

group or entity ceases to meet the grounds for national listing in accordance with regulation 3. Furthermore, Section 49 (1) (b) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024, explains that the request for delisting referred to under subsection (1) shall be made on the following grounds: (a) mistaken identity or false positive; (b) material and significant changes in facts or circumstances relating to the national listing or designation. (c) the death, dissolution or liquidation of a designated person or entity, or nationally listed person, group, or entity; or (d) any other circumstances that demonstrate that the basis for designation or national listing ceases to exist. Hence, *this sub-criterion remains Met.*

- (c) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on Regulations 27 of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. After this, Zambia introduced amendments to the Act and maintained that text of the Regulations. According to section 72E of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024, a nationally listed person, group or entity that is aggrieved with the decision of the Minister may appeal to the High Court. Hence, *this sub-criterion remains Met.*
- (d) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on Regulations 14 of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. After this, Zambia introduced amendments to the Act and maintained that text of the Regulations. Regulation 14 enables a designated person or entity to submit a petition for delisting to the Focal Point. Furthermore, section 49(1) of the Act (as amended) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024 provides that, “A person who appears on the United Nations sanctions list or the national list may submit a request for delisting from the— (a) United Nations sanctions list— (i) to the Office of the United Nations Ombudsperson, or to the Focal Point in accordance with the procedures set out in Resolution 1730 (2006) of the United Nations Security Council or any other subsequent or future Resolution. Hence, *this sub-criterion remains Met.*
- (e) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on Regulations 14 of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. After this, Zambia introduced amendments to the Act and maintained that text of the Regulations. With respect to designations on the Al-Qaida Sanctions List, Section 46 of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024 provides procedures to inform the designated persons and entities of

the availability of the United Nations Office of the Ombudsperson, pursuant to UNSCRs 1904, 1989 and 2083 to accept de-listing petitions. Hence, *this sub-criterion remains Met.*

- (f) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on Section 43B (3) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2023 and Regulations 17(1) of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. After this, Zambia introduced amendments to the Act and maintained that text of the Regulations. Section 50(3) of the Act (as amended) enables the Centre to direct unfreezing of the funds or other assets of an inadvertently affected person, group or entity with a similar name as a designated person or entity. The Act and Regulations can be accessed by the public through <https://fic.gov.zm/legislation> and hard copies are publicly available at the Government Printers offices. Hence, *this sub-criterion remains Met.*
- (g) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on Regulations 13 and 14 of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. After this, Zambia introduced amendments to the Act and maintained that text of the Regulations. Under section 49 (8) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024, the Centre is required to communicate the delisting to a reporting entity, supervisory body, State institution, any other person or entity or a virtual asset service provider in a newspaper of general circulation in the Republic or on its website or through electronic mail or any other means available. Hence, *this sub-criterion remains Met.*

34. **Criterion 6.7 –(Met) The 3rd FUR rated this c 6.7 as Met** based on Section 52(6) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2023. Zambia introduced amendments to the Act. Section 53D (4) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024, provides legal basis for a person, group, or entity whose funds other assets have been frozen under this Act to submit a request, to the Minister, for authorisation to access the frozen funds or other assets to settle basic expenses or extraordinary expenses. In relation to the UN listed persons or entities, subsection (9) states that ‘the Minister shall, where the request under subsection (4) relates to a designated person or entity, submit the request to the United Nations Ombudsperson or Focal Point Person under the relevant United Nations Sanctions Committee for determination and notify the Centre’. **Hence, c6.7 is still rated Met.**

Weighting and Conclusion

35. Zambia amended the Anti-Terrorism and Non-Proliferation Act 2018 and promulgated the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No.1 of 2024 which legal instruments address the outstanding deficiencies in implementing the targeted financial sanctions framework. The framework provides for implementation of TFS related to TF without delay. There is also an unconditional prohibition on dealing in any funds or other assets of designated persons or entities, and clear, independent administrative designation procedures separate from criminal processes. **With all seven sub-criteria now fully met, Rec.6 is re-rated from Partially Compliant to Compliant.**

3.1.3 Recommendation 7: Targeted Financial Sanctions Related to PF (Previously rated PC, now re-rated to C)

	Year	Rating
MER	2019	NC
FUR 1	2022	Re-rated to PC
FUR 2	2023	PC (No re-rating request made)
FUR 3	2024	PC (Not re-rated)
FUR 4	2025	C (re-rated from PC)

36. *Criterion 7.1 – (Met)- The 3rd FUR rated c.7.1 as Partly Met* based on the fact that it was not clear that the TFS against UN designations would be implemented within 24 hours. In order to address this deficiency, Zambia has amended the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024.
37. Section 45(1) provides that the UN sanctions list shall take effect in Zambia immediately after a designation is made by the relevant UN Sanctions Committee. To implement this requirement, the National Anti-Terrorism Center (the Centre) has subscribed to the UN mailing list. As a result, the Center receives designations immediately after they are made. According to Section 45(4), the Center is required to monitor the UN sanctions list daily. Furthermore, upon receiving the relevant United Nations sanctions list, the Center communicates without delay to reporting entities, supervisory authorities, state institutions, or any other affected persons or entities, including virtual asset providers, for immediate implementation as prescribed (section 46 of the Act). Section 2 of the Anti-Terrorism and Non-Proliferation (Amendment) Act No.30 of 2024 clarifies that "without delay" means implementing targeted financial sanctions within twenty-four hours of the

United Nations Security Council or its relevant Sanctions Committee issuing a designation.

38. Furthermore, Section 5.1 of the National Anti-Terrorism Centre Guidelines on the Implementation of Targeted Financial Sanctions for Terrorism and Proliferation Financing outlines the required dissemination timeframe, specifying that the Center must disseminate the list within seven hours, and the relevant recipients must scan their databases, take freezing action (where necessary) and report back to the Centre within sixteen hours. The guidelines are binding on all addresses as provided in section 72D(3) and are subject to penalties for non-compliance. **Hence, c7.1 is re-rated as Met.**
39. **Criterion 7.2 – (Met) – The 2019 MER and 3rd FUR rated c.7.2 as Partly Met** mainly because the provisions did not apply to TFS relating to PF. Zambia has since introduced a new law and Regulations as explained below.

(a)-(Met)- **The 3rd FUR rated this sub-criterion Met** based on Regulation 10(1) of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024. After this, Zambia amended that Act. Under Section 47(1) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024, Zambia also requires all natural and legal persons within the country to freeze, without delay and without prior notice, the funds or other assets of designated persons and entities. According to section 3 of the Interpretation and General Provisions Act, the term 'person' includes both natural and legal person. **Hence, this sub-criterion remains Met.**

(b)-(Met)- **The 3rd FUR rated this sub-criterion Met** based on Regulation 10(1) of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations 2024. Subsequent to this, Zambia amended the Act. Under Section 47(1)(a), as amended by Act No. 30 of 2024, of the Anti-Terrorism and Non-Proliferation Act 2024, the freezing obligation extends to: (i) all funds or other assets, that are owned or controlled by the nationally listed person, group or entity, or designated person or entity, and which are not necessarily tied to a particular act, plot or threat of terrorism or proliferation; (ii) funds or other assets, that are wholly or jointly owned or controlled, directly or indirectly, by a nationally listed person, group or entity, or designated person or entity; (iii) the funds or other assets, derived or generated from funds or other assets, owned or controlled directly or indirectly by a nationally listed person, group or entity, or designated person or entity; (iv) or funds or other assets, of a person, group or entity acting on behalf of, or at the direction of, a nationally listed person, group or entity, or designated person or entity; and (v) subject to paragraph (a), report to the Centre and the relevant competent authority on any assets frozen, attempted transactions, or actions taken in compliance with the implementation of targeted financial

sanctions related to terrorism, terrorism financing, proliferation and proliferation financing. **Hence, this sub-criterion remains Met.**

(c) **-(Met)- The 3rd FUR rated this sub-criterion as Partly Met** based on Sections 45 and 46 of the Anti-Terrorism and Non-Proliferation (Amendment) Act, 2023. The FUR found that the obligation was conditional upon a natural or legal person having knowledge or reasonable suspicion that the funds or financial resources shall be used for purposes of terrorism or proliferation. Zambia introduced amendments to the Act. Under Section 52(1), as amended by Act No. 30 of 2024, of the Anti-Terrorism and Non-Proliferation Act 2024, a person, group or entity are prohibited to deal with funds, other assets, economic resources, or other related resources owned, held or controlled directly or indirectly, wholly or jointly, by or for the benefit of a nationally listed person, group, or entity, or a designated person or entity, an entity owned or controlled, directly or indirectly, by a nationally listed person, group, or entity or a designated person or entity, or a person or entity acting on behalf of, or at the direction of, a nationally listed person, group, or entity, or a designated person or entity, unless licensed, authorised or otherwise notified in accordance with the relevant United Nations Security Council Resolution or by the Centre. **Hence, this sub-criterion is re-rated as Met.**

(d) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on section 43(3) of the Anti-Terrorism and Non-Proliferation Act. Subsequent to this, Zambia introduced amendments to the Act. Based on Section 46 (a), as amended by Act No. 30 of 2024, of the Anti-Terrorism and Non-Proliferation Act 2024, the Centre has the responsibility to communicate the national listing or designations made by the Minister or a relevant United Nation Sanctions Committee under sections 43, 44 and 45, without delay, to a reporting entity, supervisory body, State institution, any other person or entity, or a virtual asset service provider, that may be holding targeted funds or other assets in a national newspaper of general circulation or on its website or through electronic mail or any other means. Currently, Zambia uses both the website and emails to communicate national listing or designations. The Sanctions list is posted on the website and emails are sent to the Centre's mailing list. Furthermore, section 72D (2) provides that the Centre shall issue guidelines relating to the obligations of a reporting entity and other persons or entities, that may be holding targeted funds or other assets in taking action under a freezing mechanism. In January 2025, the National Anti-Terrorism Centre issued guidelines on implementation of targeted financial sanctions on terrorism and proliferation financing. The Guidelines were published through the government gazette and were also posted on the National Anti-Terrorism Centre and the Financial Intelligence Centre's websites. The addressees (people to whom the Guidelines were disseminated) include reporting entities, supervisory bodies, state institutions

and any other person or entity (including FIs and DNFBPs). **Hence, this sub-criterion remains Met.**

(e) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on section 43A (2) of the Anti-Terrorism and Non-Proliferation Act and Regulation 9(1)(b) of the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations 2024. Subsequent to this, Zambia introduced amendments to the Act. Under section 47(1)(b) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024, a reporting entity, supervisory body, State institution, any other person or entity or a virtual asset service provider are required to report to the Centre and the relevant competent authority on any assets frozen, attempted transactions, or actions taken in compliance with the implementation of targeted financial sanctions related to terrorism, terrorism financing, proliferation and proliferation financing. **Hence, this sub-criterion remains Met.**

(f) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on regulation 17(7) of the Anti-Terrorism and Non-Proliferation (Implementation of United Nations Security Council Resolutions) Regulations, 2024. After this, Zambia amended the Act. Section 48, of the Anti-Terrorism and Non-Proliferation Act 2024, provides measures to protect the rights of bona fide third party acting in good faith when implementing the obligations under targeted financial sanctions under this Act. **Hence, this sub-criterion remains Met.**

40. **Overall, based on the foregoing analysis and conclusions c.7.2 remains Met.**

41. **Criterion 7.3 - (Met)- The 3rd FUR rated c 7.3 as Met** based on s.12(1) and 72A(1) of the Anti-Terrorism and Proliferation Finance 2018 as amended in 2023. Zambia has further amended the Act in 2024 and added some new provisions as analyzed below.

42. Section 12 of the Anti-Terrorism and Non-Proliferation Act No. 6 of 2018, as amended, enables the Centre to ensure compliance with the obligations that pertain to R.7 and the Centre is empowered to impose administrative sanctions where a failure to comply does not attract criminal sanctions. This is in terms of section 72A (1) of the Act. In addition, s.47(1)(b) and (3) require FIs and DNFBPs to (a) report to the Centre and the relevant competent authority on any assets frozen, attempted transactions, or actions taken in compliance with the implementation of targeted financial sanctions related to terrorism, terrorism financing, proliferation and proliferation financing. Non-compliance with this requirement attracts penalties specified in s.72(A).

43. Furthermore, Zambia has set out requirements of FIs and DNFBPs concerning their obligations on TFS in relation to PF in Statutory Instrument NO. 1 of 2024. In addition to this, the country has issued national anti-terrorism centre guidelines on the implementation of targeted financial sanctions on terrorism and proliferation financing.

The main objective of the guidelines is to help FIs and DNFBPs understand and implement their obligations on combating TF and PF. **Hence, c7.3 is still Met.**

44. **Criterion 7.4 –(Met)- The 3rd FUR rated c.7.4 as Met.** Zambia has since introduced a new law, and Regulations as explained below.

- (a) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on Regulation 14(1) of the Anti-Terrorism and Non-Proliferation (Implementation of United Nations Security Council Resolutions) Regulations, 2024. After this, Zambia amended the Act. Section 49 (1), of the Anti-Terrorism and Non-Proliferation Act 2024, provides procedures for the delisting. A person who appears on the United Nations sanctions list or the national list may submit a request for delisting to: the Office of the United Nations Ombudsperson, or to the Focal Point in accordance with the procedures set out in Resolution 1730 (2006) of the United Nations Security Council or any other subsequent or future Resolution; or (ii) to the Minister accompanied by supporting information and documents. **Hence, this sub-criterion remains Met.**
- (b) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on section 43B (3) of the Anti-Terrorism and Non-Proliferation Act and regulation 17(1) of the Anti-Terrorism and Non-Proliferation (Implementation of United Nations Security Council Resolutions) Regulations, 2024. After this, Zambia amended the Act. Section 50(3) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024 outlines the procedures to unfreeze funds or other assets of a person, group or entity with the same or similar name as the designated or nationally listed person group or entity who were inadvertently affected by a freezing mechanism. **Hence, this sub-criterion remains Met.**
- (c) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on section 52(6)(e) of the Anti-Terrorism and Non-Proliferation Act, 2018. After this, Zambia amended its Act. Section 53D (4) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024, provides a legal basis and procedures for a person, group, or entity whose funds other assets have been frozen under this Act to submit a request, to the Minister, for authorisation to access the frozen funds or other assets to settle basic expenses or extraordinary expenses. **Hence, this sub-criterion remains Met.**
- (d) **-(Met)- The 3rd FUR rated this sub-criterion as Met** based on regulations 13 and 15 of the Anti-Terrorism and Non-Proliferation (Implementation of United Nations Security Council Resolutions) Regulations, 2024. After this, Zambia amended the Act. Under section 49 (8) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024, the Centre is required to communicate the delisting to a reporting entity, supervisory body, State

institution, any other person or entity or a virtual asset service provider in a newspaper of general circulation in the Republic or on its website or through electronic mail or any other means available. **Hence, c7.4 is still Met.**

45. **Criterion 7.5 — (Met)- The 3rd FUR rated c 7.5 as Met** based on section 52(1)(a) and (b) of the Anti-Terrorism and Non-Proliferation Act No.6 of 2018 and Regulation 19(2) of the Anti-Terrorism and Non-Proliferation (Implementation of United Nations Security Council Resolutions) Regulations, 2024. After this, Zambia amended the Act. Section 53D (1) and (2) of the Act (as amended) addresses the requirements of this criterion.

(a) Under Section 53D(3)(a) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024, Zambia permits the addition to the accounts frozen pursuant to UNSCRs 1718 or 2231 of interests or other earnings due on those accounts under contracts entered prior to the designation or listing of that person or entity. **Hence, this sub-criterion is still Met.**

(b) In terms of Section 53D(3)(b), payments are allowed to be made which are based on contracts, agreements or obligations that arose prior to the date on which those accounts became subject to the freezing obligations. This is allowed under the following conditions: Zambia (a) determined that the contract is not related to any of the prohibited items, materials, equipment, goods, technologies, assistance, training, financial assistance, investment, brokering or services referred to in United Nations Security Council Resolution 2231 and any future successor resolutions (Under Section 53D(3) (a) of the Anti-Terrorism and Non-Proliferation (Amendment) Act No. 30 of 2024); (b) determined that the payment is not directly or indirectly received by a person or entity subject to the measures in paragraph 6 of Annex B to United Nations Security Council Resolution 223153D(3) and (c) submitted prior notification to the United Nations Security Council of the intention to make or receive such payments or to authorise, where appropriate, the unfreezing of funds, other financial assets or economic resources for this purpose, within ten working days prior to such authorization. **Hence, this sub-criterion is still Met.**

46. **Overall, based on the foregoing analysis and conclusions, c7.5 is still Met.**

Weighting and Conclusion

47. Zambia has amended the Anti-Terrorism and Non-Proliferation Act 2018 and promulgated the Anti-Terrorism and Non-Proliferation (United Nations Security Council Resolutions Implementation) Regulations, Statutory Instrument No. 1 of 2024 which legal instruments address the outstanding deficiencies in implementing the targeted financial sanctions on proliferation financing. The current legal framework enables Zambia to implement targeted financial sanctions without delay. **In view of this, Rec.6 is re-rated from Partially Compliant to Compliant.**

3.1.4 Recommendation 8 Non-Profit Organisations (Previously rated PC, now re-rated to LC)

.	Year	Rating
MER	2019	PC
FUR 1	2022	PC (Not re-rated)
FUR 2	2023	PC (Not re-rated)
FUR 3	2024	PC (Not re-rating request made)
FUR 4	2025	LC (re-rated from PC)

48. **Criterion 8.1 –(Met)-The 2019 MER and 2nd FUR rated this criterion as Partly Met.** The assessors established that a subset of NGOs whose features and types are likely to be at risk of terrorist financing abuse had not been identified. The authorities did not explain the nature of threats posed by terrorist entities to the NPOs which are at risk as well as how terrorist actors abuse those NPOs. Subsequent to this, Zambia has addressed the deficiencies as indicated below.

(a) **-(Met)-** The 2024 Terrorism Financing (TF) Risk Assessment Report for the Non-Profit Organization (NPO) sector, rated the country as having an overall low risk of TF abuse. Zambia has identified 4,598 NPOs that fall under the FATF definition of an NPO because they raise or disburse funds and are involved in various activities such as social welfare, health, religious, education, charity among other good works. These types of NPOs included Non-Governmental Organisations as defined by the NGO Act No. 16 of 2009, some religious organisations, some companies limited by guarantee³, youth organisations, community service societies and disability organisations. Zambia identified the subset of NPOs that are at risk for TF, based on their activities. These include: receiving funds from high-risk jurisdictions; use of high-risk transaction methods; operations along high-risk border areas; dissemination of radical or extremist ideologies through religious activities; receiving or disbursing large sums of money; and receiving funding from unknown donors (paragraphs 118–119 of the risk assessment). **Hence, this sub-criterion is Met.**

(b) **-(Met)-** Through a TF risk assessment, Zambia identified the nature of TF risks posed by terrorist entities to NPOs, as well as how terrorist actors exploit these organizations. The assessment found that the primary threats are linked to terrorist activities carried out by foreign terrorist groups, specifically Ahlu Sunna Wah Jama'a (ASWJ), Al-Shabaab, and the Islamic State - Central African

³ According to the risk assessment conducted, it was revealed that 1809 out of 9646 companies limited by guarantee qualified as FATF NPOs as they were involved in the raising or disbursing of funds as well as undertaking various types of 'good works' that included charity, religious, educational and cultural works.

Province (ISCAP). Furthermore, the risk assessment also identified 10 TF risk factors including: (i) affiliation in high-risk jurisdictions; (ii) accessing funds from high-risk jurisdictions; (iii) Operations abroad; (iv) Use of high-risk transaction methods (Cash); (v) Use of high-risk transaction methods (crypto, online, crowd funding); (vi) Operating along risky borders; (vii) disseminating radical or extremist ideologies through religious activities; (viii) receiving huge sums of money (Foreign Funding); (ix) disbursing huge sums of money; and (x) funding from unknown donors. **Hence, this sub-criterion is Met.**

(c) **-(Met)-** Zambia continuously reviews the adequacy of measures, including laws and regulations applicable to the sub-sector found to be at the risk of TF abuse. For instance, Zambia amended Section 7 of the NGOs Act by introducing subsection (c), which provides that the NGO Board, in consultation with the FIC, shall establish measures for monitoring the risk of NPOs being abused for terrorist financing (TF). Furthermore, Zambia developed the 2022 Standards and Guidelines for NGOs (June 2022), which provide for the protection of NGOs against TF abuse under Section 15. Section 17 of the 2022 Standards and Guidelines for NGOs provide sanctions for non-compliance with the requirements. These initiatives have led to the development of focused, proportionate and risk-based measures to address the risk identified. **Hence, this sub-criterion is Met.**

(d) **– (Met) –** Zambia periodically re-assesses the NPO Sector. In 2016, Zambia conducted a National Risk Assessment (NRA), which included the NPO Sector and rated the terrorist financing (TF) risk for the sector as medium. The country subsequently conducted a sectoral risk assessment in 2020 and an updated the sectoral risk assessment in 2024 by reviewing new information. **Hence, this sub-criterion is Met.**

49. **Overall, c.8.1 is re-rated as Met based on the above analysis.**

50. **Criterion 8.2 -(Met)-** The 2019 MER and 2nd FUR rated c 8.2 as Partly Met. Subsequent to this, Zambia has addressed the deficiencies as indicated below.

(a) **– (Met) –** Zambia has clear policies to promote accountability, integrity, and public confidence in the administration and management of NPOs as contained in the NGO Act No. 16 of 2009, the 2022 Standards and Guidelines for NGOs, and the 2022 Financial Intelligence Centre (General) Regulations. In particular, with a view to promoting accountability and integrity, Section 26 empowers the Registrar to request relevant information from any registered NGOs such as source of funding, office bearers, activity reports, financial reports, annual returns to promote compliance to the NGO Act. Failure to comply with this provision attracts a fine of eighty thousand penalty units, upon conviction. In relation to public confidence in the administration and management of NGOs, Section 10 provides a prohibition to operate an NGO which is not registered in

Zambia. A person who contravenes this prohibition commits an offence and is liable, upon conviction, to a fine not exceeding three hundred thousand penalty units or to imprisonment for a term not exceeding three years, or to both. **Hence, this sub-criterion is Met.**

- (b) – **(Met)** – **The 2nd FUR rated this sub-criterion as Met.** While the country had conducted outreach and awareness programs to the NPOs, it was noted that that such awareness had not been provided to the donor community as required under this sub-criterion. Subsequent to the 2nd FUR, the Department of Registrar for NGO in conjunction with the Financial Intelligence Centre, Council of NGOs, Zambia Council for Social Development and National Anti-Terrorism Centre among others have continued to undertake joint outreach and educational programmes to raise awareness with NGOs and Donors on terrorist financing issues. The authorities shared a presentation made by the Department of Registrar for NGO to some donors in October 2024. **Hence, this sub-criterion is still Met.**
- (c) – **(Met)** – The 2nd FUR noted that the Ministry of Community Development and Social Services (Department of Registrar for NGOs) had issued Standards and Guidelines for NPOs in June 2022. The Guidelines were jointly developed by the authorities and the Council of NGOs, donors and other stakeholders. Section 15 of the Guidelines focuses on protection of the NPOs against TF abuse. This satisfies the requirements of c.8.2(c). The Standards and Guidelines for NGOs ensure that all stakeholders in the NGO sector operate in a harmonious and predictable manner, benefiting the citizens they serve. Additionally, these Standards and Guidelines include measures to protect NGOs from terrorist financing (TF) abuse. **Hence, this sub-criterion is Met.**
- (d) - **(Met)** - **Under the 2nd FUR, this sub-criterion was Met** based on the letter written by the Ministry of Community Development (Department of Registrar for NGOs) dated 20th May 2021 to NGOs. In addition, Section 15.2.9 of the 2022 Standards and Guidelines for NGOs require NGOs to conduct financial transactions through regulated financial channels. The Department of Registrar for NGOs has continued to encourage NPOs to conduct transactions via regulated financial channels. This is done on a continuous basis during the registration process and TF outreach awareness programmes. **Hence, c.8.2 (d) is Met.**

51. **Overall, c.8.2 is re-rated as Met based on the above analysis.**

52. **Criterion 8.3 -(Met)-** The 2nd FUR rated c 8.3 as Partly Met. The major deficiency identified was that Zambia had not provided evidence of how it was implementing a targeted risk-

based supervision or monitoring based on the identified risks of this sector as outlined in the TF Assessment Report of 2020.

53. The authorities have taken steps to enhance the supervision and monitoring of NPOs based on their exposure to terrorist financing (TF) risk. For instance, Zambia has carried out a risk assessment, and based on the findings, the country's overall low risk of NPOs for TF abuse. Furthermore, the country has developed NPO Risk Based Measures that are commensurate with or proportionate to the risk profiles of the NPOs. In relation to Low Risk NPO, the measures include; (i) onsite monitoring once every two years, (ii) offsite monitoring once every year, (iii) analysis of annual financial and activity reports filed by NPOs every year; Medium Risk NPOs measures include; (i) onsite monitoring once every year, (ii) offsite monitoring once every six months, (iii) analysis of annual financial and activity reports filed by NPOs every year. High Risk Measures include; (i) onsite monitoring once every quarter, (ii) offsite monitoring once every quarter, (iii) analysis of annual financial and activity reports filed by NPOs every year. As can be noted, the frequency of above measures varies with the level of TF risk profile of the NPO. In terms of scope/intensity, the above interventions are varied depending on the specific vulnerabilities of a particular NPO. For instance, for NPOs which are associated with vulnerabilities related to high-risk transactions (cash transactions), Zambia conducts outreaches to sensitise them on the benefits of using the formal financial sector.
54. Furthermore, existing regulatory measures also contribute towards mitigating the risks. For instance, Section 8 of the Standard and Guidelines of NGOs 2022 provides power for the NGOs regulator to monitor and evaluate activities and share results with beneficiaries and relevant key stakeholders for feedback and joint learning. Other measures which help to address the current TF risk to the NPOs, include registration requirement (Section 2), financial management (Section 9), and targeted risk-based supervision or monitoring (section 15.2.2).
55. **Therefore, c.8.3 is rated Met.**
56. **Criterion 8.4 -(Mostly Met)- The 2nd FUR rated this sub-criterion as Partly Met.** Assessors noted that the TF risk factors relating to the NPO sector in Zambia had not yet been identified and therefore, the monitoring activities by the supervisory authorities in the NPO sector for compliance had not been determined according to risk, which affects the risk-based measures applied by the authorities. Reviewers could also not determine whether sanctions under the Guidelines can address the identified deficiency as Zambia had not indicated that the Guidelines other enforceable means in Zambia.
 - (a) – **(Mostly Met)** - Zambia identified the subset of Non-Profit Organizations (NPO) falling under the FATF definition and those which are at the risk of TF abuse. As indicated above, Zambia has developed the risk-based measures guided by the outcome of the updated risk assessment which was complete in December 2024. The authorities have just started applying the measures to

monitor compliance with the requirements of this Recommendation [Information supporting this FUR was provided in February 2025 as per the ME Procedures].

- (b) **-(Met)** – Zambian authorities are able to apply effective, proportionate, and dissuasive sanctions for NPO-related violations using various legislation and other instruments. Sanctions for violations by NPOs or individuals acting on their behalf are provided under Sections 17 and 36 of the NGO Act. Furthermore, Section 72A of Zambia's Anti-Terrorism and Non-Proliferation Act, specifically deals with the implementation of targeted financial sanctions against individuals or entities linked to terrorism, proliferation, or their financing, in line with UN Security Council resolutions. The 2022 Standards and Guidelines for NGOs, under Section 17, provides for actions to be undertaken against NGOs that fail to implement the outlined measures including those under Section 15 relating to protection of NGOs against TF abuse. Actions against NGOs that fail to implement the stated measures may include penalty fees, suspension or cancellation of certificates of Registration. The FIC Act (General) Regulations also provides for a general penalty (regulation 22) for contravening the provisions of the regulations which include measures relating to protection of NGOs from TF abuse. **Hence, c8.4 is re-rated as Met.**

57. **Overall, c8.4 is re-rated as Mostly Met.**

58. **Criterion 8.5 -(Met)- The 2nd FUR rated c 8.5 as Mostly Met.** Reviewers noted that only sub-criterion 8.5(d) remains with a moderate deficiency in the sense that the MOU provided by Zambia, between the NATC and FIC, to enable speedy sharing of information does not show how the identified deficiency in 8.5(d) is addressed. Reviewers concluded that Zambia had not yet developed an appropriate mechanism that enabling them to take preventive or investigative actions in line with the requirements of this sub-criterion.

- (a) – **(Met) - The MER and 2nd FUR rated c.8.5(a) Mostly Met.** However, the MER did not highlight any deficiency. Hence, the appropriate rating should have been Met. The Department of Registrar for NGOs has signed MOUs with the FIC and the National Anti-Terrorism Centre to facilitate cooperation, coordination and information sharing. The Department of Registrar for NGOs is also a member of the national AML/CFT Taskforce which provides a platform for information sharing with other relevant authorities. **Therefore, this sub-criterion is re-rated Met.**
- (b) – **(Met) - The MER and 2nd FUR rated c.8.5(b) Mostly Met.** However, the MER did not highlight any deficiency. Zambia has competent authorities (LEAs and National Anti-Terrorism Centre) with investigative expertise and capability to examine those NPOs suspected of either being exploited by, or actively supporting, terrorist activity or terrorist organisations. **Hence, c8.5(b) is still rated Mostly Met.**

- (c) **-(Met) - In the 2019 MER, this sub-criterion was rated Mostly Met.** The deficiency was that the provisions which facilitate access to information were not necessarily related to TF. The MER noted that the Department of Registrar for NPOs has full access to information based on s,26(1) of the NGO Act. The scope of this section is wide enough to cover even information on TF. In addition, the NATC which is a designated competent authority to investigate TF and PF has full access to information as they conduct their investigative work related to TF (Section 12 (5) and 12(6) of the Anti-Terrorism and Non-Proliferation Act No. 6 of 2018. **Hence, this sub-criterion is re-rated Met.**
- (d) **-(Met) - In the 2019 MER, this sub-criterion was rated Partly Met** since the only mechanism was that NGOs were designated as reporting entities. Based on the information provided so far, Zambia has the following mechanisms to facilitate prompt sharing of information or take preventive or investigative action whenever there is suspicion that an NPO:
- (i) Is involved in TF abuse and/or is a front for fundraising by a terrorist organisation; -Reporting entities are obliged to conduct ongoing monitoring of customer transactions and report any suspicious transactions carried out by customers, which include NGOs. In addition, the reporting entities are obliged to submit reports on wire transfer transactions and currency transaction reports to the FIC. When the reports relate to NGOs they are processed and disseminated with priority to the LEAs. Furthermore, the Department of Registrar for NGOs monitors the NGOs and is able detect TF related activities and report to the appropriate LEAs for investigations.
 - (ii) Is being exploited as a conduit for TF, including for purposes of escaping asset freezing measures, or other forms of terrorist support; - Reporting entities are obliged to screen transactions, including the beneficiaries conducted on behalf their customers. If an NGO is carrying out a transaction in favour of a listed person, the systems should be able to detect.
 - (iii) Is concealing or obscuring the clandestine diversion of funds intended for legitimate purposes but redirected for the benefit of terrorists or terrorist organisations; -The Department of Registrar for NGOs has entered into MOUs with LEAs which are a basis of information sharing. In addition, the Department is also a member of AML/CFTP National Task Force and participates in quarterly meetings held by the Task of Senior Officials. This forum provides opportunities for stakeholders to exchange information bordering on terrorism as well as terrorism financing. **Hence, c8.5 (d) is rated Met.**

59. **Overall, c.8.5 is re-rated as Met based on the above analysis**

60. **Criterion 8.6 -(Met) The 2019 MER rated this criterion as Met.** Zambia has a National Anti-Terrorism Centre which is mandated to be the point of contact dealing with

international requests for information regarding NPOs suspected of TF or involvement in other forms of terrorist support. In addition, the FIC can also use its powers under section 5(3)(b) of the Act to deal with requests for information regarding such NPOs. **Hence, c8.6 is still Met.**

Weighting and Conclusion

61. Zambia has conducted an NPO TF risk assessment and identified the nature of TF risks posed to NPOs. Based on this, Zambia developed risk-based measures applicable to NPOs that may be vulnerable to TF abuse. Although the overall NPO risk for TF abuse is low, the country has developed risk-based measures for each risk profile: low, medium and high. The authorities have just started applying these measures to monitor compliance with the requirements of this Recommendation. These shortcomings are minor considering the risk and contextual factors of Zambia. **Therefore, R. 8 is re-rated from PC to Largely Compliant.**

IV. CONCLUSION

62. Overall, Zambia has made significant progress in addressing deficiencies of its technical compliance identified in its MER in relation to Recommendations 5, 6, 7 and 8. Hence, Recommendations 5, 6 and 7 have been re-rated from PC to C while Recommendation 8 has been re-rated from PC to LC.

Table 4.1 Technical Compliance Re-rating, August 2025

<i>R. 1</i>	<i>R.2</i>	<i>R.3</i>	<i>R.4</i>	<i>R.5</i>	<i>R.6</i>	<i>R.7</i>	<i>R.8</i>	<i>R.9</i>	<i>R10</i>
<i>LC</i>	<i>LC</i>	<i>C</i>	<i>C</i>	<i>PC</i> <i>C</i>	<i>PC</i> <i>C</i>	<i>PC</i> <i>C</i>	<i>PC</i> <i>LC</i>	<i>C</i>	<i>LC</i>
<i>R.11</i>	<i>R.12</i>	<i>R.13</i>	<i>R.14</i>	<i>R.15</i>	<i>R.16</i>	<i>R.17</i>	<i>R.18</i>	<i>R.19</i>	<i>R.20</i>
<i>LC</i>	<i>LC</i>	<i>C</i>	<i>LC</i>	<i>PC</i>	<i>LC</i>	<i>LC</i>	<i>LC</i>	<i>LC</i>	<i>C</i>
<i>R.21</i>	<i>R.22</i>	<i>R.23</i>	<i>R.24</i>	<i>R.25</i>	<i>R.26</i>	<i>R.27</i>	<i>R.28</i>	<i>R.29</i>	<i>R.30</i>
<i>C</i>	<i>LC</i>	<i>LC</i>	<i>PC</i>	<i>PC</i>	<i>PC</i>	<i>C</i>	<i>PC</i>	<i>C</i>	<i>LC</i>
<i>R.31</i>	<i>R.32</i>	<i>R.33</i>	<i>R.34</i>	<i>R.35</i>	<i>R.36</i>	<i>R.37</i>	<i>R.38</i>	<i>R.39</i>	<i>R.40</i>
<i>LC</i>	<i>C</i>	<i>C</i>	<i>C</i>	<i>LC</i>	<i>LC</i>	<i>LC</i>	<i>LC</i>	<i>LC</i>	<i>LC</i>

63. Zambia will remain in enhanced follow-up and will continue to inform ESAAMLG of the progress made in improving the implementation of its AML/CFT/CPF measures. The next report shall be submitted for consideration in March/ April 2026.