

[AI generated English translation]

Republic of the Union of Myanmar

Anti-Money Laundering Central Body

Committee on Assessing Terrorist Financing Risks Related to Non-Profit Organizations (NPOs)

Standard Operating Procedure for Periodic Terrorist Financing Risk Assessment Related to Non-Profit Organizations (NPOs)

March 2026

Table of Contents

1. Introduction
2. Objectives
3. Assessment Methodology
4. Types of Periodic Assessment Activities
 - 4.1 Thematic/Targeted Reassessment
 - 4.2 Comprehensive NPO TF Risk Reassessment
5. Procedures for Conducting Periodic Assessments
 - 5.1 Thematic/Targeted Reassessment
 - 5.2 Comprehensive NPO TF Risk Reassessment
6. Timeline for Periodic Assessments
7. Use of Results
8. Conclusion

1. Introduction

1. In order to identify and assess terrorist financing threats, vulnerabilities, and the risks of abuse in their services within the Non-Profit Organizations (NPOs) sector in Myanmar, the Anti-Money Laundering Central Body formed and assigned duties to the **"Committee on Assessing Terrorist Financing Risks Related to Non-Profit Organizations (NPOs)"** via Order No. (1/2024) dated April 2, 2024.
2. Based on the World Bank's "Non-Profit Organizations TF Risk Assessment Tool," the **"Guideline for Assessing Terrorist Financing Risks Related to Non-Profit Organizations (NPOs)"** was formulated, and risk assessments were conducted accordingly. In doing so, in accordance with Recommendation 8 of the Financial Action Task Force (FATF) standards on combating money laundering and terrorist financing, NPO types falling within FATF's definition were identified, risk identification and assessment were categorized according to the nature of NPOs' operations, and the risk assessment report was released in July 2025.
3. Paragraph 2, Sub-paragraph (c) of Order No. (1/2024) issued by the Anti-Money Laundering Central Body on April 2, 2024, states: *"obtaining new information"*

related to the Non-Profit Organizations sector and re-assessing the risks of money laundering and terrorist financing in that sector within regular designated periods." Therefore, to ensure that the risks identified through the risk assessment process remain consistent with the latest situation, the Committee will continue to implement the periodic risk assessment process.

2. Objectives

4. The objective of this Standard Operating Procedure (SOP) is to enable the Committee to implement periodic assessments regarding terrorist financing risks within the NPO sector, fulfilling its duties as follows:
 - (a) To systematically implement risk-based procedures and timelines.
 - (b) To continuously ensure that the risks identified from the terrorist financing risk assessment process of NPOs—which was implemented based on the World Bank’s assessment methodology—remain aligned with current circumstances.
 - (c) To timely identify changing risks and ensure compliance with the standard requirements of FATF Recommendation 8.
 - (d) To utilize the results emerging from periodic assessments for supervision, awareness-raising, and policy and legal review/amendment regarding the NPO sector.

3. Assessment Methodology

5. When conducting periodic assessments, the Committee will utilize the assessment methodology and risk indicators previously used in the NPO terrorist financing risk assessment process.
6. Periodic assessments will focus on identifying and evaluating changes, trends, and developments in risks that may have arisen since the last assessment. Assessments will be determined based on the quantity and quality of collected information (Quantitative and Qualitative Information). Periodic assessments will identify threats and vulnerabilities within the NPO sector, coordinate and evaluate risk mitigation measures, and determine the remaining Residual Risks of terrorist financing.

4. Types of Periodic Assessment Activities

7. The Committee will implement periodic assessments using two categories:
 - (a) Thematic/Targeted Reassessment
 - (b) Comprehensive NPO TF Risk Reassessment

4.1 Thematic/Targeted Reassessment

8. The Committee will implement thematic or targeted reassessments under the following conditions and timings:
 - (a) When new terrorism or terrorist financing crimes involving NPOs occur.

- (b) When other relevant circumstances arise in addition to the following situations:
 - (1) Occurrence of major terrorist incidents domestically or regionally.
 - (2) Discovery of new terrorist financing typologies involving NPOs.
 - (3) Revision and issuance of laws and rules related to NPOs.
 - (4) Significant increase in operations of high-risk NPOs.
 - (5) Inclusion of important references regarding NPOs in Mutual Evaluation Reports and Follow-up Reports issued mutually among member countries by FATF or the Asia-Pacific Group on Money Laundering (APG).
 - (6) A significant increase in the receipt and screening status of Suspicious Transaction Reports (STRs) related to terrorist financing based on Financial Intelligence Unit (FIU) reports.
 - (7) An increase in investigations and prosecutions related to terrorism and terrorist financing involving NPOs, based on law enforcement agency information.

4.2 Comprehensive NPO TF Risk Reassessment

9. The Committee will implement comprehensive sector-wide reassessments under the following conditions and timings:
 - (a) Every three years, or during the period designated for implementing the National Money Laundering and Terrorist Financing Risk Assessment process.
 - (b) Deciding to conduct a comprehensive reassessment at a committee coordination meeting based on findings from thematic reassessment processes.
 - (c) Being assigned to conduct an assessment via orders or instructions issued by the Anti-Money Laundering Central Body.

5. Procedures for Conducting Periodic Assessments

5.1 Thematic/Targeted Reassessment

10. The Committee will implement thematic reassessments through the following 5 steps:
 - (a) **Step (1) Convening Committee Meetings:** When conditions in paragraph 8 arise, the Committee will convene a coordination meeting to decide on the types of periodic assessment activities required.
 - (b) **Step (2) Collecting Information:** The Committee will gather current-state information and other relevant details from respective government departments and organizations, including:
 - (1) Number and types of registered NPOs.
 - (2) Number of STRs related to NPOs.

- (3) Information on investigations, prosecutions, and convictions related to terrorism and terrorist financing involving NPOs.
- (4) Reports containing new terrorist financing typologies and supervisory reports on NPOs issued by relevant government departments/organizations.
- (5) Result reports concerning awareness-raising activities conducted by relevant government departments/organizations.
- (c) **Step (3) Risk Assessment:** The Committee will perform risk assessment as follows:
 - (1) *Identifying Changes:* Compare collected data with findings from previous assessment processes to identify changes—whether terrorist financing threats have increased, decreased, or remained the same—and assess whether new vulnerabilities have emerged.
 - (2) *Evaluating Risk Mitigation Measures:* Assess the effectiveness of risk mitigation measures implemented after the previous risk assessment. This includes evaluating the effectiveness of risk-based supervision and monitoring, risk mitigation instructions, and outreach activities.
 - (3) *Updating Risk Levels:* Using the grading methodologies applied in the original risk assessment, update risk levels by NPO category or across the entire NPO sector. Changes in risk levels will be documented by comparison with the baseline assessment results. NPO categories shifting to "High risk" will be specifically highlighted.
- (d) **Step (4) Reporting:** The Committee will formulate the **Periodic NPO TF Risk Assessment Report**, clearly presenting the reassessment activities and results, submit it to the Anti-Money Laundering Central Body for approval, and release it. This report will fully detail background information, objectives, previous assessment results, changing circumstances, effectiveness of mitigation measures, newly identified risks and vulnerabilities, and comprehensive overviews.

5.2 Comprehensive NPO TF Risk Reassessment

11. When conducting comprehensive sector-wide reassessments, the Committee will utilize the risk assessment manual issued by the Committee based on the World Bank's assessment methodology.

6. Timeline for Periodic Assessments

12. The Committee will execute periodic assessment activities according to the following schedule:

Sr.	Subject	Responsible Entity	Timeframe
1	Baseline NPO TF Assessment	Committee	Completed
2	Convening Committee Meetings	Committee	As required
3	Thematic Assessment	Committee	As required
4	Comprehensive Reassessment	Committee	Once every 3 years
5	Interim Effectiveness Review	Committee	Annually

13. The Committee will execute thematic assessments according to the following timeframe:

Sr.	Thematic Assessment Process	Responsible Team	Timeframe
1	Information Collection	Secretariat Team	2 months
2	Risk Assessment	Committee	1 month
3	Report Preparation	Secretariat Team	1 month
4	Review via Committee Meeting	Committee	Approx. 2 weeks
5	Securing Approval from Central Body & Publishing Report	Secretariat Team	Approx. 2 weeks

7. Use of Results

14. Results derived from periodic assessments will be distributed to relevant government departments and organizations to be utilized in the following operations:

- (a) Risk-based Supervision & Monitoring
- (b) Targeted outreach and awareness programs
- (c) Revising and issuing NPO-related guidelines
- (d) Proposing recommendations for amending laws and rules if necessary

8. Conclusion

15. All documents, data, analyses, meeting minutes, and reports related to the periodic reassessment process of terrorist financing risks concerning NPOs will be securely maintained by the Committee Secretariat in accordance with **The Myanmar Official Secrets Act, 1923**.
16. This SOP for Periodic Terrorist Financing Risk Assessments Related to Non-Profit Organizations (NPOs) shall be periodically reviewed and reissued as necessary to align with legal frameworks, rules and regulations, FATF standards, APG guidelines, or evolving terrorist financing risks.

Committee on Assessing Terrorist Financing Risks Related to Non-Profit Organizations (NPOs)

Letter No.: 4372 (15 / 14 - 03 / Oo 4)

Date: March 10, 2026

Distribution:

- Anti-Money Laundering Central Body
- Financial Intelligence Unit
- All Committee Members