



Date: 19 December 2025

GUIDELINES NO. FIU/G-1/2025/1

APPENDIX 1: LIST OF HIGH-RISK INDICATORS



1. LIST OF HIGH-RISK INDICATORS

1.1. This list is not exhaustive and may be updated at any time

No.	Factors
Customer-specific	
1	Complex or opaque ownership structures, especially those without clear economic purpose, e.g. shell companies, complex trusts, etc.
2	High net worth individuals with unclear, unexplainable or disproportionate sources of wealth.
3	Unusual or illogical business activities for the declared type of customer/industry.
4	Customers refusing to provide required information or providing inconsistent/suspicious information.
5	Customers with negative adverse media reports or public allegations of illicit activity.
6	Customers that are non-residents.
7	Customers insisting on anonymity or non-face-to-face relationships.
8	Customers, either through employment or business association, involved in high-risk industries or cash-intensive operations or industries that are either new or remain unregulated.
Geographic	
9	Customers from jurisdictions identified as high risk for ML/TF by FATF or other similar international bodies.
10	Customers from countries subject to international sanctions, embargoes, or other measures.
11	Customers from jurisdictions with known high levels of corruption, organised crime, or terrorist financing.
12	Customers with connection/association to offshore financial centres with limited transparency.
Product or service	
13	Use of products or services that favour anonymity, e.g. prepaid cards.
14	Use of products or services with higher inherent ML/TF risk, e.g. cash transactions in large volume and/or amount, cross-border wire transfers, etc.
15	Transactions lacking clear economic rationale or legitimate business purpose.
16	Surges in account activity after being dormant.
17	Transactions with third parties in high-risk countries/jurisdictions.
Delivery channel	
18	Non-face-to-face onboarding without robust identity verification processes.
19	Use of multiple or complex third parties/intermediaries.