

# THE ANTI-TERRORISM UNIT ANNUAL REPORT

# 2024-2025



The Annual Report of the Anti-Terrorism Unit, Office of the Attorney General for the period October 2024 to September 2025 is submitted in accordance with Section 38C of the Anti-Terrorism Act, Chap. 12:07 which provides:

- (1) That the Attorney General shall, within three (3) months after the end of each year, cause a report with respect to the performance of his functions under the Anti-Terrorism Act to be prepared.
- (2) The Report shall contain such statistical and other information as the Attorney General thinks fit in relation to –
  - (a) Court Listings;
  - (b) International Cooperation;
  - (c) Forfeitures; and
  - (d) Such other matters as the Attorney General considers necessary.
- (3) The Attorney General shall cause a copy of the report to be laid before both Houses of Parliament within one (1) month after its completion.

## TABLE OF CONTENTS

PG #

1-3

LIST OF ABBREVIATIONS

4-6

ESTABLISHMENT AND COMPOSITION OF THE  
ANTI-TERRORISM UNIT

7-10

CORE OBJECTIVES OF THE ANTI-TERRORISM  
UNIT

11- 21

INTERNATIONAL OBLIGATIONS

22-24

DEVELOPMENT OF AML/CFT/CPF  
POLICIES

25

TRINIDAD AND TOBAGO'S 5TH  
ROUND MUTUAL EVALUATION

26-29

TRINIDAD AND TOBAGO'S AML/CFT/CPF  
LEGISLATIVE FRAMEWORK

30-32

THE NATIONAL RISK ASSESSMENT OF  
TRINIDAD AND TOBAGO

33-36

TRAINING SENSITISATION AND  
OUTREACH

37

DOMESTIC AND INTERNATIONAL  
COOPERATION

## *List of Abbreviations*

ACRONYM	MEANING
<b>AG</b>	Attorney General
<b>AML/CFT/CPF</b>	Anti-Money Laundering/Countering the Financing of Terrorism /Countering Proliferation Financing
<b>ATA</b>	Anti-Terrorism Act Chap. 12:07
<b>ATU</b>	Anti-Terrorism Unit
<b>BHC</b>	British High Commission
<b>C&amp;E</b>	Customs and Excise
<b>CARICOM IMPACS</b>	CARICOM Implementation Agency for Crime and Security
<b>CBTT</b>	Central Bank of Trinidad and Tobago
<b>CFATF</b>	Caribbean Financial Action Task Force
<b>CROS</b>	The Miscellaneous Provisions (Registrar General, Companies, Registration of Business Names, and Non-Profit Organisations) Act, No. 4 of 2024
<b>CT</b>	Counter-Terrorism
<b>DNFBPs</b>	Designated Non-Financial Business and Professions
<b>EDF</b>	European Development Fund
<b>FATF</b>	Financial Action Task Force
<b>FI</b>	Financial Institution
<b>FIB</b>	Financial Investigations Branch
<b>FIUTT</b>	Financial Intelligence Unit of Trinidad and Tobago
<b>FSRB</b>	FATF-Style Regional Body
<b>FT</b>	Financing of Terrorism
<b>FTFs</b>	Foreign Terrorist Fighters
<b>GORTT</b>	Government of the Republic of Trinidad and Tobago

ACRONYM	MEANING
<b>IMF</b>	International Monetary Fund
<b>IRD</b>	Inland Revenue Division
<b>ISIL</b>	The Islamic State of Iraq and the Levant
<b>LB</b>	Listed Business
<b>LEAs</b>	Law Enforcement Agencies
<b>MER</b>	Mutual Evaluation Report
<b>MEs</b>	Mutual Evaluations
<b>MHS</b>	Ministry of Homeland Security
<b>ML</b>	Money-Laundering
<b>MOF</b>	Ministry of Finance
<b>MOFCA</b>	Ministry of Foreign and CARICOM Affairs
<b>MOU</b>	Memorandum of Understanding
<b>NAMLC</b>	National Anti-Money Laundering and Counter Financing of Terrorism Committee
<b>NPO</b>	Non-Profit Organization
<b>NRA</b>	National Risk Assessment
<b>OAG</b>	Office of the Attorney General
<b>ODPP</b>	Office of Director of Public Prosecution
<b>PF</b>	Proliferation Financing
<b>POCA</b>	The Proceeds of Crime Act, Chap. 11:27
<b>PUWO</b>	Preliminary Unexplained Wealth Order
<b>RGD</b>	Registrar General Department
<b>SIU</b>	Special Investigation Unit
<b>SOP</b>	Standard Operating Procedure
<b>SSA</b>	Strategic Services Agency
<b>TCQ</b>	Technical Compliance Questionnaire

ACRONYM	MEANING
<b>TF</b>	Terrorism Financing
<b>TFC</b>	Task Force Charlie
<b>TFS</b>	Targeted Financial Sanctions
<b>TTCG</b>	Trinidad & Tobago Coast Guard
<b>TPPS</b>	Trinidad and Tobago Police Service
<b>TTSEC</b>	Trinidad and Tobago Securities and Exchange Commission
<b>UK</b>	United Kingdom
<b>UN</b>	United Nations
<b>UNSC</b>	United Nations Security Council
<b>UNSCRs</b>	United Nations Security Council Resolutions
<b>UWOs</b>	Unexplained Wealth Orders
<b>VAs</b>	Virtual Assets
<b>VASPs</b>	Virtual Asset Service Providers
<b>WMD</b>	Weapons of Mass Destruction

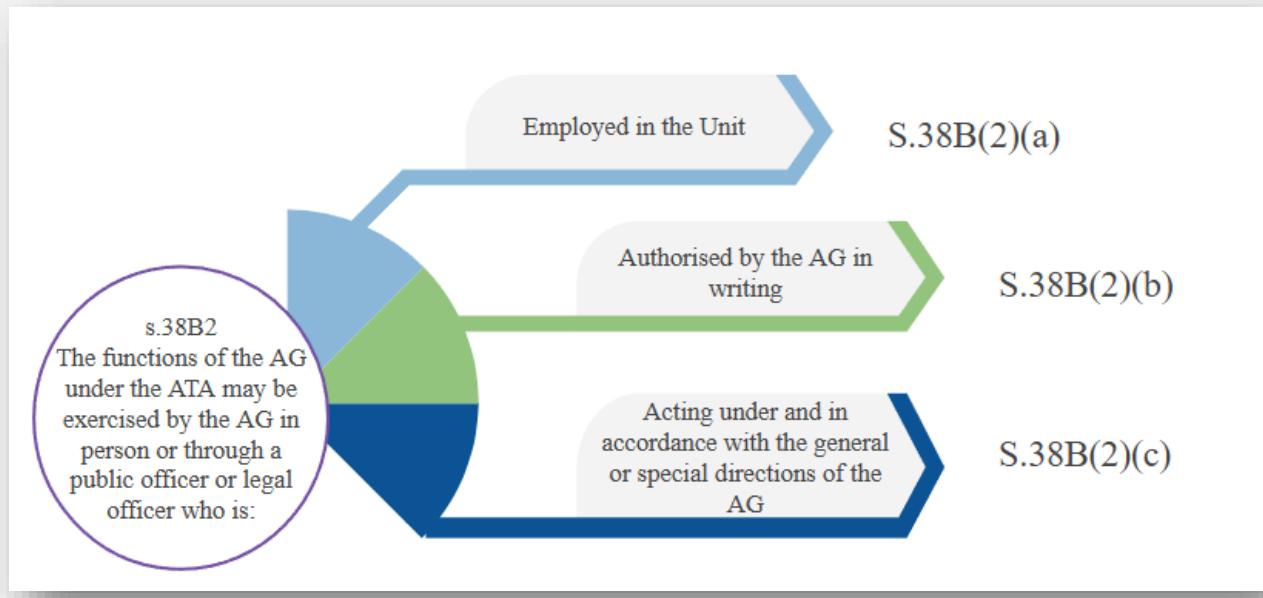
## *The Establishment and Composition of the Anti-Terrorism Unit*

The Miscellaneous Provisions (Proceeds of Crime, Anti-Terrorism and Financial Intelligence Unit of Trinidad and Tobago) Act, 2018, assented to on December 31, 2018, amended the Anti-Terrorism Act, Chapter 12:07 (the ATA) to *inter alia* introduce a *new* provision for the establishment of an Anti-Terrorism Unit (the ATU).

Thus, the ATU was established in the Office of the Attorney General (OAG) in July 2019 in order to efficiently carry out Trinidad and Tobago's international obligations pursuant to the United Nations Security Council Resolutions (UNSCRs) and the Financial Action Task Force (FATF) Standards, coupled with the growing global threat of Terrorism and Terrorism Financing (TF).

The ATU, *inter alia*, provides an essential role in fulfilling the obligations of the Honourable Attorney General (AG) pursuant to the ATA. The diagram below illustrates who can exercise the functions of the AG under Section 38B of the ATA.

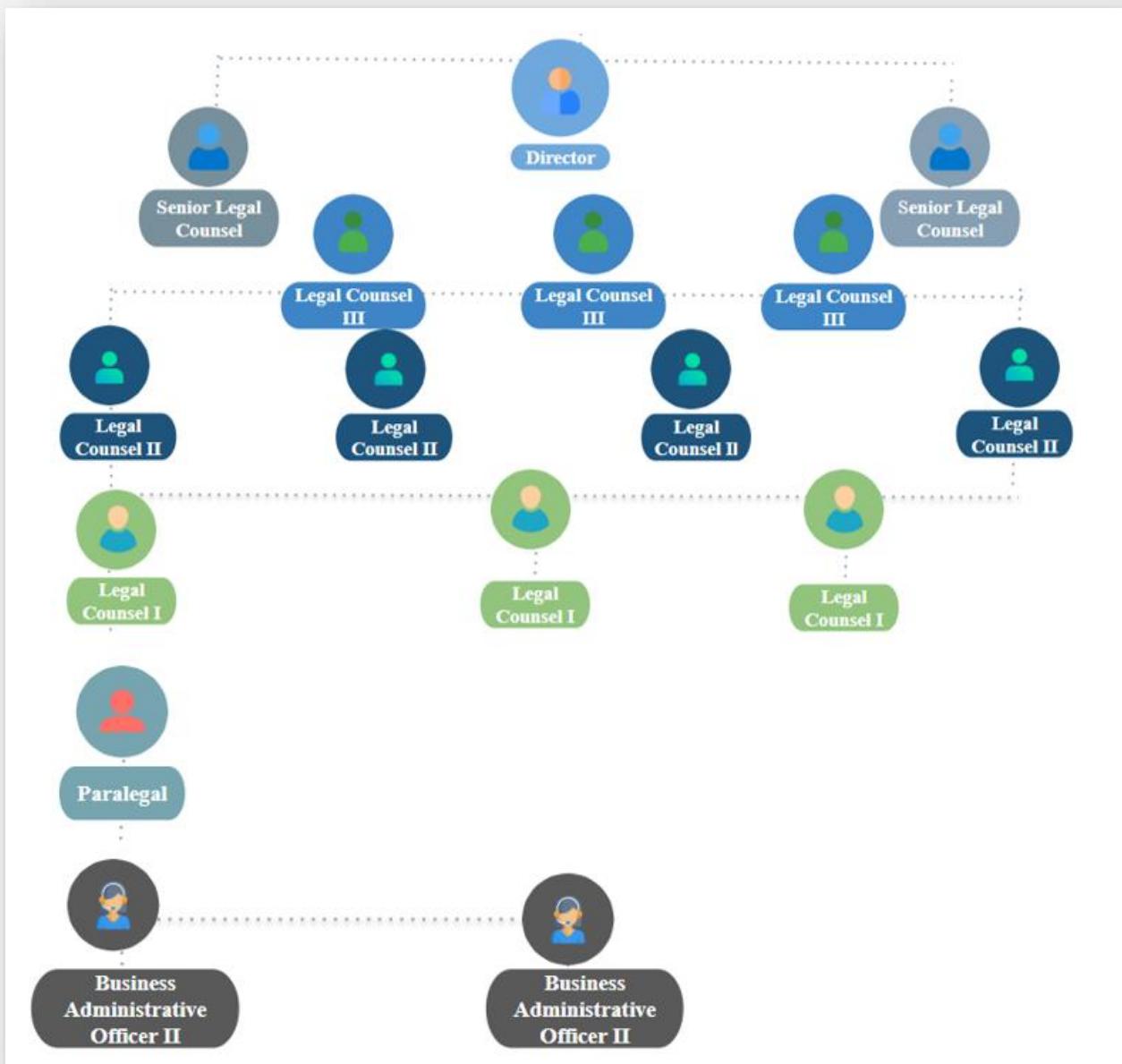
**Diagram 1 illustrating who can exercise the functions of the AG under Section 38B of the ATA**



## The Composition of the ATU

The ATU is comprised of the following positions as illustrated in Diagram 2 below:

*Diagram 2 illustrating the Composition of the ATU*



The ATU has collaborated with the Human Resource Management Unit to ensure that the recruitment process for filling the vacant positions commenced following approval by the Permanent Secretary. The OAG Human Resource Department has begun issuing internal advertisements on a phased basis for the vacant positions. This process remains ongoing under the supervision of the Permanent Secretary. As at October 2025, the following positions remain vacant:

- ✓ Director
- ✓ Three (3) Legal Counsel III
- ✓ Two (2) Legal Counsel II
- ✓ Two (2) Legal Counsel I
- ✓ One (1) Business Operations Assistant II

[The Anti-Money Laundering/Combatting the Financing of Terrorism \(AML/CFT\) Compliance Unit, Office of the Attorney General:](#)

The Anti-Money Laundering/Combatting the Financing of Terrorism (AML/CFT) Compliance Unit was transferred in 2020 from the Ministry of National Security to the OAG under the purview of the ATU. Subsequently, on December 21, 2023, the following positions were redesignated (i) Head, Anti-Terrorism Unit and (ii) Director, Compliance (AML/CFT), to be merged and jointly referred to as Director Anti-Terrorism and Anti-Money Laundering Office of the Attorney General. The AML/CFT Compliance Unit is currently unstaffed.

## *The Core Objectives of the Anti-Terrorism Unit*

The core objective of the ATU is to efficiently carry out the functions of the AG pursuant to the ATA. Primarily, the ATU continuously implements Section 22B of the ATA by making applications to the High Court for the designation of individuals and entities, both domestically and as detailed on various United Nations Security Council (UNSC) Sanctions Lists, as well as the application of Targeted Financial Sanctions (TFS). The term TFS encompasses both asset freezing and prohibitions to prevent funds or other assets from being made available, directly or indirectly, for the benefit of designated persons and/or entities.

The ATU also works closely with key national agencies relative to Counter-Terrorism (CT) matters as well as with our international partners. Measures to freeze terrorist funds or other assets may complement criminal proceedings against a designated person or entity, but are not conditional upon the existence of such proceedings. The measures serve as a preventive or disruptive tool when criminal proceedings are either not possible or not practical.

The ATU provides support to Trinidad and Tobago's Prime Contact to the Caribbean Financial Action Task Force (CFATF) and the CFATF Secretariat.

The ATU also provides key support to the National Anti-Money Laundering and Counter Financing of Terrorism Committee (NAMLC) as the coordinating authority for Trinidad and Tobago's national AML/CFT/CPF framework. The Unit ensures that the country's legislative, regulatory, and institutional systems are effectively aligned with the FATF Recommendations and regional standards. The Unit performs a critical role as Secretariat to the NAMLC, facilitating coordination among competent authorities, policy formulation, and oversight of national AML/CFT/CPF initiatives. The Unit is also responsible for assisting in the country's technical compliance and effectiveness review processes, coordinating the submission of data under the Immediate Outcomes, managing legislative reform to address identified gaps, and ensuring that all stakeholders implement risk-based measures consistent with the FATF methodology. The Unit also liaises with international partners, and domestic agencies to advance national compliance efforts and maintain the country's adherence to global AML/CFT/CPF standards.

### [The National Anti-Money Laundering and Counter Financing of Terrorism Committee \(NAMLC\)](#)

The Proceeds of Crime Act, Chap. 11:27 (POCA) was amended by the Miscellaneous Provisions



(Proceeds of Crime, Anti-Terrorism and Financial Intelligence Unit of Trinidad and Tobago) Act, No. 20 Of 2018 to establish in law, NAMLC. Pursuant to Section 57A(1) of POCA, NAMLC is responsible for –

- a) (i) making recommendations to the Minister (to whom responsibility for NAMLC has been assigned) in relation to the development of policy; and
  - (ii) coordinating the implementation, of national anti-money laundering, counter financing of terrorism and proliferation financing policies;
- b) collecting and compiling statistics with respect to anti-money laundering, counter financing of terrorism and proliferation financing; and
- c) coordinating the conduct of national risk assessments and mutual evaluations.

In addition, pursuant to Section 57B of POCA, NAMLC may make rules to govern its own procedure.

In executing its mandate, the ATU as a key member of the NAMLC:

- ✓ Makes recommendations for the formulation of a National Policy in respect of AML/CFT/CPF and revisions to the National AML/CFT/CPF Policy as may be necessary in alignment with National Risk Assessment findings and the results of NAMLC's measures to maintain an ongoing understanding of ML/TF/PF risk including through ongoing sectoral risk assessments, monitoring of new and emerging trends and typologies and any other measure adopted by NAMLC to assess the ML/TF/PF risk in Trinidad and Tobago, to the Minister to whom responsibility for NAMLC is assigned (“the Minister”).
- ✓ Acts as the coordinating body for the conduct of the CFATF Mutual Evaluations (MEs) and National Risk Assessments of Trinidad and Tobago.
- ✓ Reviews the AML/CFT/CPF implications for member entities of NAMLC of policies and legislation in line with National Risk Assessment findings as required with a view to determining their adherence to the national AML/CFT/CPF framework.
- ✓ Engages and consults with the AML/CFT/CPF stakeholder community on their understanding of ML/TF/PF risks and on the design and/or updating of implementation action plans, priority steps and risk assessments. In so doing, NAMLC shall ensure that the national risk and the stakeholder community's understanding of risk is harmonized on a continuous basis via its sub-committees.

- ✓ Coordinates and cooperates with all relevant competent authorities to ensure the compatibility of AML/CFT/CPF requirements with Data Protection and Privacy Rules and other similar provisions.
- ✓ Facilitates the following:
  - a. ensure effective exchange of information between the public and private sectors;
  - b. create awareness workshops, seminars, and conferences and disseminate publications and electronic sources of information;
  - c. provide a forum for consultation and collaboration among reporting entities and supervisory authorities, institutions and organs of the State; and
  - d. provide technical assistance to the AML/CFT/CPF stakeholder community by periodically reviewing the overall needs assessments of the various organizations that are involved or within the AML/CFT/CPF framework.
- ✓ Evaluates the progress and results of national AML/CFT/CPF activities and formulate proposals and recommendations for submission to the AG of Trinidad and Tobago in his capacity as Prime Contact to the CFATF.
- ✓ Contribute to the review of key FATF and CFATF policies, procedures, recommendations and standards and participate in Plenary meetings of the CFATF and FATF, as required.

The NAMLC is currently composed of high-level representatives and their alternates from key ministries and competent authorities, such as:

- The Office of the Attorney General
  - The Anti-Terrorism Unit
  - The Legislative Drafting Department
  - The Central Authority Unit
  - The Criminal Justice Unit
- The Ministry of Finance
  - The Financial Intelligence Unit of Trinidad and Tobago
  - The Trinidad and Tobago Securities and Exchange Commission
  - The Inland Revenue Division
  - The Customs and Excise Division

- The Central Bank of Trinidad and Tobago
- The Office of the Director of Public Prosecutions
- The Ministry of Defence
  - The Legal Department
- The Ministry of Homeland Security
  - The Immigration Division
  - The Trinidad and Tobago Police Service
  - The Financial Investigations Branch
- The Ministry of Land and Legal Affairs
  - The Registrar General's Department

## INTERNATIONAL OBLIGATIONS:

### FINANCIAL ACTION TASK FORCE & CARIBBEAN FINANCIAL ACTION TASK FORCE

Vital to the role of the ATU is also the fulfilment of our international obligations in respect of countering terrorism, terrorist financing and proliferation financing. The FATF leads global action to tackle money laundering, terrorist and proliferation financing. The forty-member body sets international standards to ensure national authorities can effectively go after illicit funds linked to drug trafficking, the illicit arms trade, cyber fraud and other serious crimes.

The FATF Recommendations provide a comprehensive framework of measures to help countries tackle illicit financial flows. These include a robust framework of laws, regulations and operational measures to ensure national authorities can take effective action to detect and disrupt financial flows that fuel crime and terrorism, and punish those responsible for illegal activity.

The forty (40) Recommendations are divided into seven distinct areas:

- AML/CFT/CPF Policies and coordination;
- Money laundering and confiscation;
- Terrorist financing and financing of proliferation;
- Preventive measures;
- Transparency and beneficial ownership of legal persons and arrangements;
- Powers and responsibilities of competent authorities and other institutional measures; and
- International cooperation

The cornerstone of the FATF Recommendations is the risk-based approach which emphasizes the need for countries to identify and understand the money laundering and terrorist financing risks they are exposed to. This ensures they can prioritise their resources to mitigate risks in the highest risk areas. The FATF<sup>1</sup> continuously monitors new and evolving threats to the financial system and regularly updates and refines its Recommendations so that countries have up-to-date tools to go after criminals.

The FATF monitors countries to ensure they implement the FATF Standards fully and effectively. In total, more than 200 countries and jurisdictions have committed to implement the FATF's Standards and they are assessed with the help of nine FATF Associate Member organisations and

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<sup>1</sup> <https://www.fatf-gafi.org/en/the-fatf.html>

other global partners, the International Monetary Fund (IMF) and World Bank. The FATF monitors countries by mutual evaluations, which are in-depth country reports analysing the implementation and effectiveness of measures to combat money laundering, terrorist and proliferation financing. The reports are peer reviews, where members from different countries assess another country. MEs provide an in-depth description and analysis of a country's anti-money laundering and counter-terrorist financing system, as well as focused recommendations to further strengthen its system. During a mutual evaluation, the assessed country must demonstrate that it has an effective framework to protect the financial system from abuse.

The Mutual Evaluation Report (MER) is an assessment of a country's measures to combat money laundering and the financing of terrorism and proliferation of weapons of mass destruction (WMD). This includes an assessment of a country's actions to address the risks emanating from designated terrorists or terrorist organisations. The MER is without prejudice to the status or justification that led to the designation of an entity as a terrorist or terrorist group or organisation.

MEs comprise of two main components, effectiveness and technical compliance. The most important part of a mutual evaluation is a country's effectiveness ratings. This is the focus of an on-site visit by a team of experts to the assessed country. During this visit, the assessment team will require evidence that demonstrates that the assessed country's measures are working and delivering the right results. What is expected from a country differs, depending on the ML, TF and other risks it is exposed to. The assessment of technical compliance is also an important part of a mutual evaluation. The assessed country must provide information on the laws, regulations and any other legal instruments it has in place to combat money laundering and the financing of terrorism and proliferation.

The CFATF, founded in 1992, is one of FATF's FATF-Style Regional Bodies (FSRBs), which is a group of twenty-five (25) states of the Caribbean, South and Latin America as well as the United States of America that work together to enforce international rules against financial crimes such as ML/TF/PF set by FATF. The CFATF Secretariat is based in Trinidad and Tobago. The CFATF adopts the FATF's framework for assessing member countries' compliance and promoting the effective implementation of international AML/CFT/CPF measures.

The effective implementation of these FATF obligations by the ATU requires institutional arrangements allowing for close co-ordination among financial, intelligence and law enforcement authorities and the incorporation of the measures into the country's broader counter-terrorism

policy. The ATU has procedures in place to protect all sources of information, including intelligence and closed-source materials, used in the designation of persons and entities being subjected to the asset freeze measures. In the execution of these obligations, the ATU works closely with both the CFATF and the FATF.

The ATU continues to participate in the CFATF Plenary and Working Group Meetings held twice per year (June 2024 and November 2024) and FATF Plenary and Working Group meetings held three (3) times per year (February, June and October, 2024). Furthermore, the ATU participates in both the CFATF Steering Group monthly meetings and Council of Ministers Annual Meeting and provides support to the AG for these meetings.

The United Nations Charter<sup>2</sup> established six main organs of the United Nations (UN), including the Security Council. It gives primary responsibility for maintaining international peace and security to the Security Council, which may meet whenever peace is threatened.

According to the Charter, the UN has four purposes:

- ✓ to maintain international peace and security;
- ✓ to develop friendly relations among nations;
- ✓ to cooperate in solving international problems and in promoting respect for human rights;

and to be a centre for harmonizing the actions of nations.

All members of the UN agree to accept and carry out the decisions of the Security Council. While other organs of the UN make recommendations to member states, only the Security Council has the power to make decisions that member states are then obligated to implement under the Charter.

Trinidad and Tobago was admitted to the UN by the General Assembly on September 18, 1962, as advised by the UNSCR 175.

#### United Nations Security Council Resolutions 1267(1999), 1989(2011) and 2253(2015)

The UNSCR 1267(1999) established a sanctions regime to cover individuals and entities associated with specific terrorists and terrorist entities wherever they may be located. The regime is composed of a United Nations Security Council Committee referred to as the 1267/1989/2253 Committee which has established and maintains a list of persons and entities it has determined as being associated with terrorist entities. The Committee oversees sanctions measures imposed by the United Nations Security Council in respect of ISIL (Da'esh), Al-Qaida, and associated individuals, groups undertakings and entities. The relevant entities and individuals are listed on the ISIL (Da'esh) and Al-Qaida Sanctions List and when new information is ascertained, amendments are made to the List accordingly.

<sup>2</sup> <https://main.un.org/securitycouncil/en/content/what-security-council>

As such, the State is obligated to implement the resolutions of the United Nations and bring Trinidad and Tobago into further compliance with international standards on the global Anti-Terrorism effort. Through Resolutions 1267(1999), 1989(2011) and 2253(2015), the United Nations Security Council urges member states such as Trinidad and Tobago to *inter alia* freeze without delay the property, funds and other financial assets or economic resources owned or controlled, directly or indirectly, by terrorist entities. Trinidad and Tobago has since enacted the ATA which implemented measures to *inter alia*, freeze terrorist assets without delay pursuant to the obligations under the aforementioned Resolutions of the UNSC. Security Council Committee pursuant to resolutions 1267 (1999), 1989 (2011) and 2253 (2015) concerning ISIL (Da'esh), Al-Qaida, and associated individuals, groups, undertakings and entities (hereafter "the Committee") oversees the sanctions measures imposed by the Security Council.

#### [United Nations Security Council Resolution 2653](#)

On October 21, 2022, the UNSC adopted UNSCR 2653(2022) which *inter alia* established a sanctions regime requiring countries to freeze without delay the funds or other assets, and to ensure that no funds and other assets are made available, directly or indirectly, to or for the benefit of, any person or entity designated by, or under the authority of, the UNSC under Chapter VII of the UN Charter in the 2653 Sanctions List concerning Haiti. UNSCR 2653 (2022) establishes a travel ban, asset freeze and a targeted arms embargo on individuals and entities responsible for threatening the peace, stability and security of Haiti.

Through UNSCRs 1737(2006) and 2231(2015), the UNSC urges member states such as Trinidad and Tobago to *inter alia* freeze the property, funds and other financial assets or economic resources owned or controlled, directly or indirectly, by listed entities. In order to meet the mandates of UNSCR 2653(2022) and the UNSC Sanctions Regime on Haiti, which relates to the Program of Action (POA) to prevent, combat and eradicate the illicit trade in small arms and light weapons, Trinidad and Tobago has on the 12<sup>th</sup> day of June 2023 implemented the Economic Sanctions (Implementation of United Nations Security Council Resolution 2653(2022) on the Republic of Haiti) Order, 2023 pursuant to the Economic Sanctions Act, Chap. 81:05. The ATU has since obtained Orders from the High Court designating all seven (7) individuals on the UNSC 2653 Sanctions List and have their assets frozen. The relevant orders have been implemented.

## United Nations Security Council Resolution 1373

FATF Recommendation 6 requires countries to implement the targeted financial sanctions regimes to comply with the UNSCRs relating to the prevention and suppression of terrorism and terrorist financing, such as UNSCR 1267(1999) and its successor resolutions and UNSCR 1373. Efforts to combat terrorist financing are greatly undermined if countries do not freeze the funds or other assets of designated persons and entities quickly and effectively. The United Nations Security Council (UNSC) adopted Resolution 1373 on 28 September 2001 in response to the terrorist attacks in the United States of America on 11 September 2001. Resolution 1373 requires UN member states to suppress terrorism by implementing targeted financial sanctions in relation to persons involved in terrorist activities.

Operationally, in relation to the ongoing UNSCR obligations, Trinidad and Tobago in 2015, pursuant to Recommendation 6 of the FATF standards established an entity as a part of the mechanism for identifying targets under the UNSCRs; Task Force Charlie (TFC). TFC is an inter-agency body comprising all key investigative and intelligence gathering units related to terrorism. This includes the ATU (Chair), the Terrorism Interdiction Unit - Special Branch; Financial Intelligence Branch (FIB); Financial Intelligence Unit of Trinidad and Tobago (FIUTT); Strategic Services Agency (SSA); Interpol; Immigration Division and the Counter Terrorism Unit. Other relevant government departments, such as the Customs and Excise Division (C&E), may participate in TFC as required on a case-by-case basis. The task force is aimed at coordinating intelligence gathering and investigations regarding domestic and international terrorism.

The key objective of TFC is to provide for efficient co-ordination of intelligence, operational and strategic analysis and parallel investigations relating to terrorism. An effective co-ordination will assist in the determination of matters pursued in accordance with various UNSCRs, particularly UNSCR 1267(1999) and 1373(2001). In order to implement the TFS regimes required under FATF Recommendation 6, including initiating, or making proposals for, designations, there is the need for the ATU to engage with a range of authorities (for example, Foreign Affairs, Immigration, Central Bank) and agencies (for example, security, intelligence, law enforcement, FIUTT).

The collaboration of information, intelligence and evidence and analysis of the aforesaid also has the potential to shed light on the likelihood of success for criminal prosecution in these matters and act as a steppingstone towards prosecution whereby successful applications are granted pursuant

to Section 22B of the ATA.

### Listings and Delistings of Individuals and Entities

The ATU has worked and continues to work rigorously towards fulfilling our obligations pursuant to the legislative framework and international standards. In so doing, the ATU has designated **all** individuals and entities on the UNSC 1267(1999) (*ISIL (Da'esh) & Al-Qaida*) Sanctions List and the UNSC 1988(2011) (Taliban) Sanctions List. To date, the ATU has obtained a total of one hundred and fifty-six (156) Orders of the High Court with a total of four hundred and ninety (490) individuals and entities currently designated as listed entities and their assets frozen.

Following the granting of the aforementioned Orders by the High Court, the ATU conducts six-monthly reviews (as of the date upon which each Order is granted), in respect of each Order and when necessary, makes applications to the Court for de-listings pursuant to section 22B(9) of the ATA to ensure continued compliance on an ongoing basis to confirm whether the circumstances for designation have changed. Additionally, the UNSC ISIL (Da'esh) & Al-Qaida Sanctions Committee continues to make amendments to individuals and entities listed, resulting in seven (7) applications being filed by the ATU and Court Orders being granted.

### United Nations Security Council Resolution 1540

The ATU also works jointly with other domestic agencies including the Ministry of Foreign and CARICOM Affairs (MOFCA) to fulfill Trinidad and Tobago's obligations pursuant to UNSCR 1540(2004) which provides *inter alia*, that countries should refrain from taking part in proliferation related activities or providing any form of support to non-state actors that attempt to develop, acquire, manufacture, process, transport, transfer or use nuclear, biological, and chemical weapons and their means of delivery, in particular for terrorist purposes.

In April 2004, the UNSC adopted resolution 1540, which obligates all States to institute domestic legal-regulatory measures and controls to prevent the proliferation of nuclear, chemical, and biological WMD, their means of delivery, and related materials to non-State actors. By obliging states to prevent the unregulated transfer of WMD-related materials and dual-use goods and know-how to and by actors ranging from unwitting private sector companies and individuals to criminal organizations and terrorists, UNSCR 1540 augments the international framework of nonproliferation treaties, conventions, and protocols to help prevent the spread and use of the world's most dangerous weapons.

In resolution 1540 (2004)<sup>3</sup>, the Security Council decided that all States shall refrain from providing any form of support to non-State actors that attempt to develop, acquire, manufacture, possess, transport, transfer or use nuclear, chemical or biological weapons and their means of delivery, in particular for terrorist purposes. The resolution requires all States to adopt and enforce appropriate laws to this effect as well as other effective measures to prevent the proliferation of these weapons and their means of delivery to non-State actors, in particular for terrorist purposes.

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<sup>3</sup> <https://disarmament.unoda.org/en/our-work/weapons-mass-destruction/un-security-council-resolution-1540>

Diagram 3 illustrating the Domestic Listings

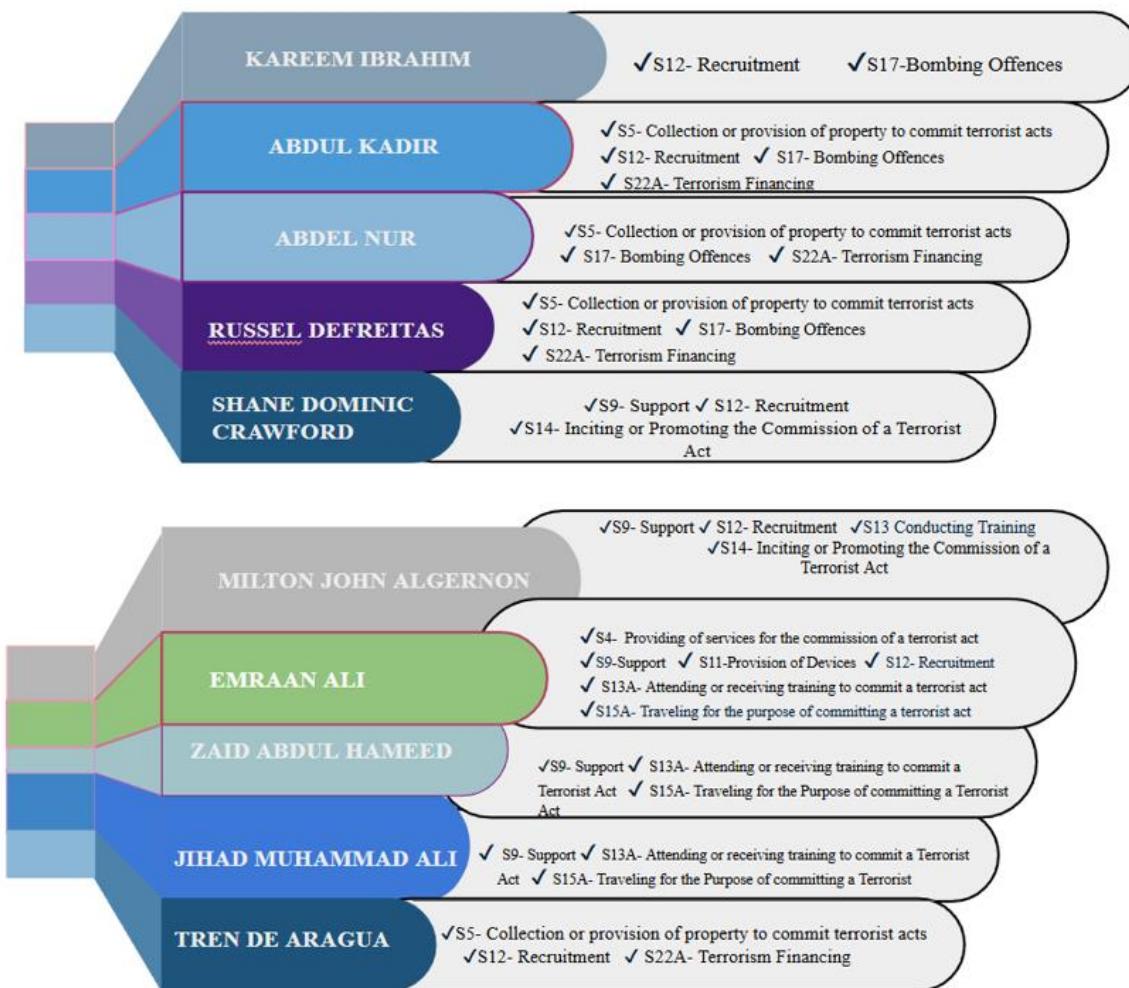
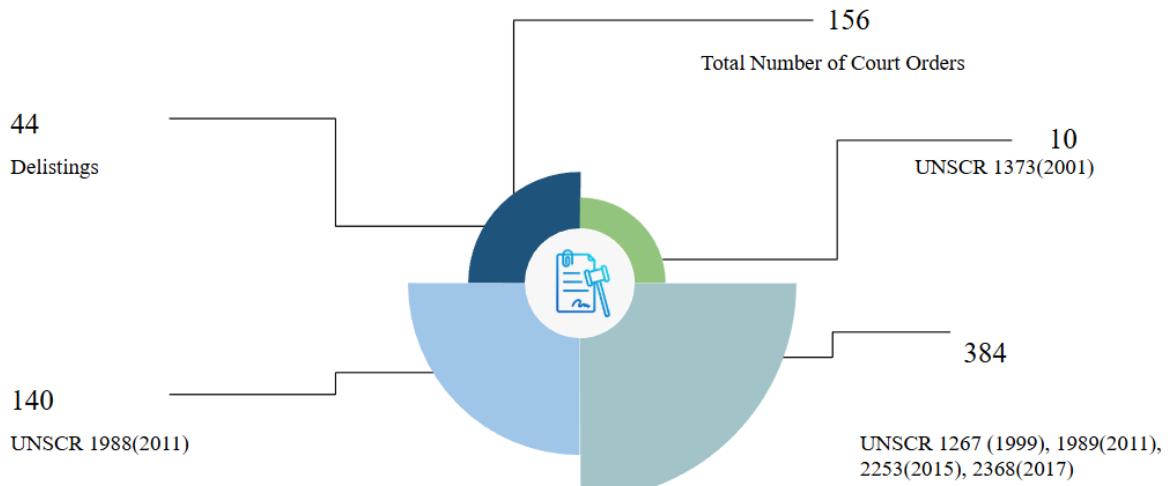
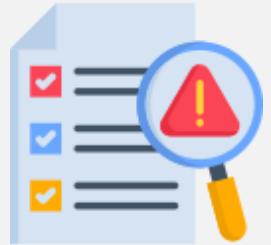


Table 1: Annual Listings and De-listings

UNSCR	Year/s	No of Listed entities & individuals	No. of Court Orders
<b>1267(1999)</b>	2015/2016	78	<b>8</b>
	2016/2017	258	<b>60</b>
	2017/2018	20	<b>11</b>
	2018/2019	9	<b>8</b>
	2020	9	<b>7</b>
	2021	4	<b>4</b>
	2022	1	<b>1</b>
	2023	4	<b>4</b>
	2025	1	<b>1</b>
	1988(2011)	140	<b>7</b>
<b>1373(2001)</b>	2015	1	<b>1</b>
	2017	5	<b>5</b>
	2020	1	<b>1</b>
	2021	1	<b>1</b>
	2023	1	<b>1</b>
	2025	1	<b>1</b>
	2018/2019	-22	<b>15</b>
<b>Delistings</b> <b>ATA Section</b> <b>22B(9)</b>	2020	-3	<b>3</b>
	2021	-3	<b>3</b>
	2022	-11	<b>10</b>
	2023	-2	<b>1</b>
	2024	-1	<b>1</b>
	2025	-2	<b>2</b>
<b>Total</b>	<b>2015 -2025</b>	<b>490</b>	<b>156</b>

Diagram 4 illustrating the ATU Listings and De-listings





### Trinidad and Tobago’s National AML/CFT/CPF Policy and Strategy

This Policy and Strategy which received Cabinet’s approval in July 2025 follows the latest review of national AML/CFT/CPF policies by NAMLC in keeping with its mandate, and outlines Trinidad and Tobago’s overarching national AML/CFT/CPF policies as adopted by Cabinet. It therefore provides clear and unambiguous direction to all national authorities on implementing the country’s strategies for ensuring that Trinidad and Tobago maintains a strong and effective AML/CFT/CPF framework. This includes requiring competent authorities to ensure alignment of their sectoral and institutional policies, operational strategies and activities with this policy.

This document has been developed to enable the mitigation of money laundering, terrorist financing and proliferation financing (ML/TF/PF) risks, based on its understanding of the risks Trinidad and Tobago has been assessed as being exposed to. It sets out Trinidad and Tobago’s overall AML/CFT/CPF policies, as well as the key elements of the strategies to be followed to ensure that the policy focus is effectively maintained, and the desired objectives achieved. It describes the institutional arrangements to effectively implement the national AML/CFT/CPF framework, and key actions and activities to maintain and strengthen them.

### Trinidad and Tobago’s Civil Asset Forfeiture Regime

The FATF recommends that countries observe and implement the respective recommendations, inclusive of *inter alia* specifically Recommendations 4 and 38, which deal with confiscation and provisional measures and mutual legal assistance: freezing and confiscation respectively, and to take the necessary steps to ensure effectiveness as detailed in Immediate Outcome 8 relating to confiscation of the proceeds and instrumentalities of crime as follows:

*“Criminals are deprived (through timely use of provisional and confiscation measures) of the proceeds and instrumentalities of their crimes (both domestic and foreign) or of property of an equivalent value. Confiscation includes proceeds recovered through criminal, civil or administrative processes; confiscation arising from false cross-border disclosures or declarations; and restitution to victims (through court proceedings). The country manages seized or confiscated assets, and repatriates or shares confiscated assets*

*with other countries. Ultimately, this makes crime unprofitable and reduces both predicate crimes and money laundering.”*

The Civil Asset Act broadens the application of freezing and forfeiture provisions to cover all persons subjected by law. The effect of the Civil Asset Act, is therefore to expand the basis upon which confiscation orders can be made by providing for the High Court to grant a range of orders including Unexplained Wealth Orders (UWOs) which require individuals to explain their interest in specified property and the source of wealth used to acquire it, utilizing the civil standard and civil courts. Part V of the Act, which is in force, expands the basis upon which confiscation orders can be made by providing for UWOs. The Inland Revenue Division (IRD), the Customs and Excise Division, Ministry of Finance (MOF), and the Trinidad and Tobago Police Service (TTPS) can apply for a Preliminary Unexplained Wealth Order (PUWO) if, during the course of an investigation for a specified offence, there is reasonable suspicion that the total wealth of the respondent exceeds the value of his lawfully obtained wealth and any property is owned by the respondent or is under his effective control.

In light of the above, the **OAG** in coordination with the **British High Commission** (BHC) engaged the services of **Gentium United Kingdom** (UK) via Mr. Alex Ferguson to review the existing legal and institutional framework in Trinidad and Tobago against international best practices with the aim of establishing an asset recovery and management regime for the Government of the Republic of Trinidad and Tobago (GORTT).

Consultations were conducted with the following agencies that are involved in the asset recovery and management process:

- i. Financial Intelligence Unit of Trinidad & Tobago (FIUTT);
- ii. Office of the Attorney General (OAG)- Anti-Terrorism Unit;
- iii. Office of the Director of Public Prosecutions (ODPP);
- iv. Customs and Excise Division (C&ED);
- v. Trinidad & Tobago Coast Guard (TTCG);
- vi. Trinidad & Tobago Police Service (TTPS);
- vii. Financial Investigation Branch (FIB);
- viii. Special Investigation Unit (SIU).

Questionnaires were prepared for each agency and these were used to form the basis of the discussions.

Subsequently, on October 2024, the following documents were approved by Cabinet-

- i. A national policy framework on asset recovery and management;

- ii. A 1–3-year implementation strategy to facilitate the adoption of a national policy framework for asset recovery and management, accompanied by a prioritised action plan to ensure its effectiveness; and
- iii. Standard Operating Procedure (SOP) for law enforcement agencies (LEAs), prosecutors, and the Civil Asset Recovery and Management Agency.

## *Trinidad and Tobago's 5th Round Mutual Evaluation*



The 5th round of CFATF MEs will be a six-year cycle, significantly shorter than earlier rounds, which lasted ten (10) years on average. The assessment sequence is based on three (3) factors; namely; (i) the time since a country's last assessment, (ii) its level of ML/TF risks; and (iii) the relative size of its economy and financial sector in order for FATF to assesses in priority the countries whose assessments are most outdated, that face higher risks and have important financial sectors.

The 5th Round ME Follow-up Assessment process will be a rigorous, more results-oriented process focusing on specific actions to tackle money laundering, terrorist financing and the financing of weapons of mass destruction. The shorter cycle, greater scrutiny and strong follow-up mechanisms will ensure that Governments stay focused on taking effective action to detect, prevent and punish money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction. The evaluation will not only assess the technical compliance of our legislative and institutional framework but also the effectiveness of the country's AML/CFT/CPF systems in practice. The submission of the Technical Compliance Questionnaire (TCQ) and the Immediate Outcomes submission form a core component of the CFATF assessment process. Successful evaluations are crucial for maintaining the country's reputation and access to the global financial system.

The NAMLC under its remit as the integral AML/CFT/CPF national body is tasked with ensuring that Trinidad and Tobago is equipped to coordinate the implementation of national AML/CFT/CPF policies, data and statistics; for coordinating the conduct of Trinidad and Tobago's 5th Round MER. During the period 2024 – 2025 Trinidad and Tobago and by extension the ATU as a member, continued its preparation for its 5th Round ME Process which commenced by the CFATF in May 2025 with its on-site carded to take place in March 2026. Trinidad and Tobago was the first member country of the CFATF to enter the 5th Round ME Process and thereby the MER will be required to be presented no later than December 31st, 2026.

## *Trinidad and Tobago's Anti-Money Laundering/Countering the Financing of Terrorism/ Countering Proliferation Financing Legislative Framework<sup>4</sup>*

In keeping with the FATF requirements, Trinidad and Tobago must ensure that its legislative framework is updated on an ongoing basis to meet the current trends in line with the risks associated with ML/TF/PF. As such, Trinidad and Tobago has implemented the various pieces of legislation:



### **The Proceeds of Crime Act, Chap. 11:27**

The main objective of this Act is to establish the procedure for the confiscation of the proceeds of certain offences and for the criminalising of money laundering (ML). The Financial Obligations Regulations effectively puts into place a compliance regime to be adhered to by financial institutions (FI), listed businesses (LB) and persons to which the Anti-Money Laundering Combating the Financing of Terrorism framework (AML/CFT), would be applicable.

### **The Anti-Terrorism Act (ATA) and The Financial Obligations (Financing of Terrorism) Regulations, 2011 (FOFTR) Chap. 12:07**

The ATA criminalises terrorism and Financing of Terrorism (FT), and provides for the detection, prevention, prosecution, conviction and punishment of terrorist acts, and FT. It also makes provision for the confiscation, forfeiture and seizure of terrorists' assets.

### **The Financial Intelligence Unit of Trinidad and Tobago Act, Chap. 72:01**

The FIUTTA establishes the Financial Intelligence Unit of Trinidad and Tobago for the implementation of FATF Recommendation 29. The FIUTT is tasked with the responsibility of collecting financial intelligence and information, and the analysis, dissemination and exchange of such financial intelligence and information, for the purpose of preventing and detecting ML/TF/PF.

### **The Central Bank Act, Chap. 79:02**

The Central Bank Act provides for the establishment of a Central Bank to define the powers and duties thereof and for matters incidental thereto.

<sup>4</sup> Trinidad and Tobago's 2<sup>nd</sup> National Risk Assessment

**The Mutual Assistance and Criminal Matters Act, Chap. 11:24**

This Act makes provision with respect to the Scheme relating to Mutual Assistance in Criminal Matters within the Commonwealth and to facilitate its operation in Trinidad and Tobago and to make provision concerning mutual assistance in criminal matters between Trinidad and Tobago and countries other than Commonwealth countries.

**The Economic Sanctions Act, Chap 81:05**

This Act provides for the implementation of Economic Sanctions imposed by Regional or International Organisations and for matters incidental thereto.

**The Miscellaneous Provisions (Registrar General, Companies, Registration of Business Names, and Non-Profit Organisations) Act, No. 4 of 2024 (CROS)**

The CROS legislation introduced a threshold for ‘beneficial owner’ to include the natural person who ultimately owns or controls ten per cent or more of the shares or membership interest of the company through direct ownership; indirect ownership or control through other means. The Act requires a company to maintain and keep updated a register of all the beneficial owners. The Register would contain the name, nationality or the latest known address or, telephone, email and other contact details and the date on which any person ceased to be beneficial owner.

**The Miscellaneous Provisions (Trustees, Exchequer and Audit Act, the Minister of Finance (Incorporation) Act, Proceeds of Crime, Income Tax, Companies, Partnerships, Securities, Tax Information Exchange Agreements, the Non-Profit Organizations and Mutual Administrative Assistance in Tax Matters) Act, No 1 of 2024 and The Miscellaneous Provisions (Global Forum) Act, No. 15 of 2024**

These two Acts amended various pieces of legislation so as to comply with Trinidad and Tobago’s obligations under Global Forum. The legislation requires trustees of any trust to hold basic information on other regulated agents of, and service providers to, the trust, including investment advisors or managers, accountants and tax advisors. The legislation introduces criminal penalties for non-disclosure of Beneficial Ownership information by trustees to competent authorities including law enforcement agencies.

**The Miscellaneous Provisions [Proceeds of Crime, Anti-Terrorism, Financial Intelligence Unit of Trinidad and Tobago, Securities, Insurance, Non-Profit Organisations, Civil Asset Recovery and Management and Unexplained Wealth and Miscellaneous Provisions (FATF Compliance)], No. 17 of 2024**

This Act amended various pieces of legislation in order to address, inter alia minor legislative drafting errors that were inadvertently omitted to the Miscellaneous Provisions (FATF Compliance) Act, No. 25 of 2020 and enhance the regulatory framework of the levying of administrative monetary penalties for AML/CFT/CPF breaches.

**The Miscellaneous Provisions (FATF Compliance) Act, 2025**

This Act provides for wide-ranging amendments across multiple laws to strengthen beneficial ownership transparency, expand predicate offences through an “all crimes” approach, enhance asset confiscation powers, and create administrative monetary penalties to empower supervisory authorities such as the Central Bank, the FIUTT and the TTSEC to enforce compliance more effectively, using a risk-based approach.

**The Counter-Proliferation Financing Act, 2025**

This Act closes a critical gap under FATF Recommendations 1 and 7 by requiring financial institutions and listed businesses to assess proliferation financing risks, implement risk mitigation measures in their compliance programmes, and comply with targeted financial sanctions, thereby safeguarding the country from exposure to international sanctions and correspondent banking restrictions.

**The Non-Profit Organisations Act, No. 7 of 2019**

This Act provides for the registration of non-profit organisations, the establishment and maintenance of a register of non-profit organisations, the obligations of non-profit organisations and for related matters.

**The Gaming and Betting Control Act, No. 8 of 2021**

This Act provides for the regulation and control of gaming and betting and matters related thereto.

**The Financial Institutions Act, Chap. 79:09**

Provides for the regulation of banks and other financial institutions which engage in the business of banking and business of a financial nature, for matters incidental and related thereto.

**The Securities Act, Chap. 83:02**

This Act provides protection to investors from unfair, improper or fraudulent practices; foster fair and efficient securities markets and confidence in the securities industry in Trinidad and Tobago; to reduce systemic risk, to repeal and replace the Securities Industry Act, Chap. 83:02 and for other related matters.

The legislative framework, mechanisms and procedures are continuously revised, as and when necessary, to aptly counter the ever-evolving global threat of terrorism and to develop and strengthen the tools needed to capably combat ML/TF/PF.

## *The National Risk Assessment of Trinidad and Tobago*



An NRA<sup>5</sup> is a comprehensive process used by countries to identify, assess and understand the ML/TF and PF risks they face. This process involves evaluating threats and vulnerabilities, determining the level of risk, and developing strategies aligned to its risk. This includes taking enhanced measures where risks are higher and taking simplified or lesser measures where risks are lower. The NRA provides evidence-based foundation for informed policy-making, resource allocation proportionate to the risks, and the implementation of effective and risk-based AML/CFT/CPF measures. It ensures that national strategies are aligned with the specific risk landscape of the country and that they address both domestic and international threats to the extent they are connected to the country.

### Trinidad and Tobago's 2<sup>nd</sup> National Risk Assessment

In line with Trinidad and Tobago's obligations, specifically Recommendation 1 (Assessing Risks and Applying a Risk-Based Approach) and Immediate Outcome 1 (Money laundering and terrorist financing risks are understood and, where appropriate, actions coordinated domestically to combat money laundering and the financing of terrorism and proliferation) Trinidad and Tobago embarked upon and completed its 2<sup>nd</sup> NRA, which was approved by the Cabinet of Trinidad and Tobago in January 2025 and covered the period January 2016 to December 2020. The effective prevention and mitigation of ML/TF risk in a manner commensurate with the risks required a number of actions to be undertaken successfully by national authorities, including outlining the future trends and emerging threats in the World.

The NRA was published on websites of the ATU and other competent authorities in Trinidad and Tobago in February 2025. This Risk Assessment is consistent with FATF Recommendation 1, which requires countries to identify, assess and understand their money laundering and terrorist financing (ML/TF) risks and take mitigating actions. The ATU contributed to a number of the Modules in the NRA.

The following ten (10) Modules were covered:

- Module 1- Money Laundering (ML) Threat Assessment

<sup>5</sup> <https://www.fatf-gafi.org/en/publications/Methodsandtrends/Money-Laundering-National-Risk-Assessment-Guidance.html>

- Module 2- National Vulnerability
- Module 3- Banking Sector
- Module 4- Securities Sector
- Module 5- Insurance Sector
- Module 6- Other Financial Institutions
- Module 7- Designated Non-Financial Business and Professions (DNFBPs)
- Module 8- Terrorist Financing (TF) Risk Assessment
- Module 11- Non-Profit Organisations

### Trinidad and Tobago's 3<sup>rd</sup> National Risk Assessment

Trinidad and Tobago is currently preparing to complete its 3rd NRA which will cover the period January 2021 to December 2024. Regular updates to the NRA support alignment with international best practices and further strengthen the country's AML/CFT/CPF framework. This is to ensure that the country is up to date with evolving financial crime risks, meet the FATF standards, and incorporate new data and trends. The update ensures policies remain effective and risk-focused, addressing gaps from the previous assessment while adapting to emerging threats such as virtual assets. Regular updates also help align with international best practices and strengthen the country's AML/CFT/CPF framework.

For the 3<sup>rd</sup> NRA, the following ten (10) areas will be covered:

- Money Laundering (ML) Threat Assessment
- National Vulnerability
- Banking Sector
- Securities Sector
- Insurance Sector
- Other Financial Institutions
- Designated Non-Financial Business and Professions (DNFBPs)
- Terrorist Financing (TF) Risk Assessment
- Legal Persons/ Legal Arrangements

- Non-Profit Organisations

As part of our ongoing efforts to strengthen our understanding of emerging risks and threats, Trinidad and Tobago hosted an NRA Update Workshop on Friday 21st March, 2025 to provide key updates, discuss recent findings, and align on next steps to enhance our overall approach which was attended by all competent authorities as well as key private sector organisations including both public and private sector bodies and other supervised entities. The aim of the Workshop was to discuss the commencement process of the 2nd NRA findings across all Modules and beginning the 3rd NRA. The approach taken was to:

- Review the findings of the 2nd NRA;
- Discuss within each Module Working Group regarding whether, in the expert opinion of Working Group members, the ML/TF risks have changed during the period 2021-2024; and
- Map the way forward for completion of the 3rd NRA.

In addition to the abovementioned 10 Modules, there are two (2) stand-alone Modules which will be submitted for Cabinet's consideration at a date to be determined. The two (2) stand-alone Modules are the Virtual Assets and Virtual Asset Service Providers Risk Assessment and the Proliferation Financing Risk Assessment.

#### [Trinidad and Tobago's National Action Plan](#)

In addition to the ongoing monitoring of risk and identification of emerging risks through the NAMLC, Trinidad and Tobago will conduct periodic updates to the NRA on a periodic and triggered basis using the most recent data to accurately represent the current ML/TF/PF risk levels in the country and guide national efforts to mitigate these risks. In order to mitigate the risks identified, an Action Plan is prepared as an indispensable part of the NRA exercise. The implementation of the NRA Action Plan is monitored by the NAMLC.

Trinidad and Tobago will publish an Action Plan together with the findings of the 3<sup>rd</sup> NRA in the last quarter of 2025.

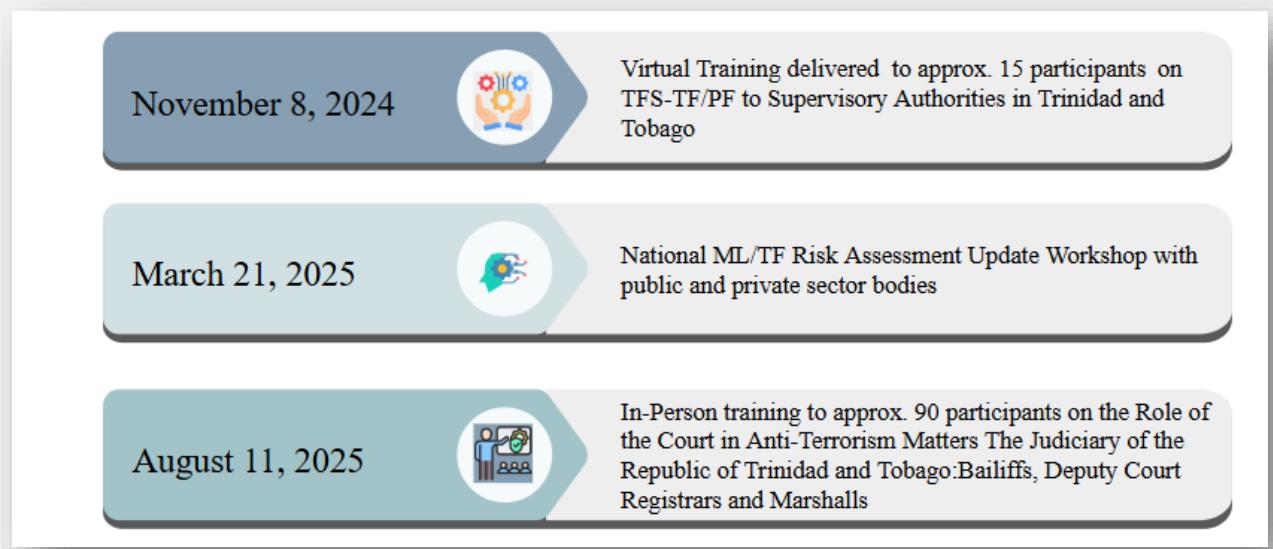


## Training, Sensitisation and Outreach

The ATU has continued to deliver training and sensitisation to law enforcement, competent agencies, regional audiences in CARICOM, as well as International Participants on the provisions of its legislative frameworks, with particular emphasis on terrorism offences, terrorist financing, confiscation of terrorist funds, terrorist financing and proliferation financing risks. Emphasis is also placed on identifying the evolving TF risks posed to the subset of Non-Profit Organisations (NPOs) in Trinidad and Tobago that fall within the FATF definition of NPOs.

Priority has been given to those agencies directly involved and operational in the gathering of intelligence and evidence for the investigation of terrorism and terrorist financing matters with more than one thousand (1000) individuals having been trained to date.

*Diagram 5 illustrating training and sensitization sessions conducted by the ATU for the period October 2024 to September 2025*



Further, the ATU also assists key Committees, Task Forces and other forums in Trinidad and Tobago in understanding the provisions of the ATA and their roles and mandates in the context of same. In this regard, members of the ATU have delivered presentations on relevant topics

specifically tailored to focus on the applicability of the provisions of the Act, the wider AML/CFT/CPF regime in Trinidad and Tobago and our international obligations.

### Sensitisation and Training Sessions

#### *Trinidad and Tobago's Response Exercise for Counter Terrorism and Terrorist Financing*

The OAG via the ATU and the Ministry of National Security, through the Counter-Terrorism Unit, jointly hosted a two-day CT workshop on February 12th and 20th, 2025. The event convened key national stakeholders involved in CT coordination as part of Trinidad and Tobago's framework for operationalizing its National Counter-Terrorism Strategy. This workshop was aimed at evaluating and enhancing Trinidad and Tobago's collective readiness and response capabilities to a terrorist event, inclusive of any related terrorist financing (and proliferation financing). The workshop focussed on:

- Briefings on and reviews of current policies, procedures, and response plans for a terrorist event, whether detected in advance or occurring without warning;
- Assessing the effectiveness of existing frameworks; and
- Identifying gaps and areas for improvement in our approach to managing such incidents.

This collaborative exercise involved key stakeholders from various sectors, including government agencies, law enforcement, and other critical entities. The sessions aimed to strengthen national CT mechanisms across strategic, operational, and tactical levels, enhance coordination, and align CT strategies with current terrorism and terrorist financing risks. Subject matter experts also reviewed frameworks for testing and implementing the national CT plan. They reaffirmed Trinidad and Tobago's commitment to a multi-pronged approach to countering terrorism and terrorist financing through legislative reform, operational strengthening, and enhanced inter-agency cooperation.

#### *Pre-Assessment Country training in collaboration with the Caribbean Financial Action Task Force*

The CFATF, in collaboration with the 11th European Development Fund (EDF), successfully conducted Assessed Country Training from March 26–28, 2025, at the AGLA Auditorium, AGLA Towers, Port of Spain, Trinidad and Tobago. The event was hosted by the Honourable Attorney General with technical support from the NAMLC.

This three-day training provided essential guidance to national stakeholders on the mutual evaluation process, emphasizing the importance of achieving technical compliance and effectiveness in implementing AML/CFT/CPF measures.

*Trinidad and Tobago’s Training on the FATF Revised Standards and Methodology*

Trinidad and Tobago via the CFATF Secretariat hosted a two-day national training on the FATF Revised Standards and Methodology during the period April 2–3, 2025, aimed at strengthening national understanding and application of the updated AML/CFT/CPF framework.

Over the two days, participants engaged in detailed sessions covering revisions to the FATF Recommendations and Immediate Outcomes, including updates on AML/CFT/CPF policies and coordination, international cooperation, and transparency and beneficial ownership. The training also addressed preventive measures and supervision for financial institutions, virtual asset service providers (VASPs), and designated non-financial businesses and professions (DNFBPs), as well as the use of financial intelligence and relevant information. Additional sessions explored revisions to Recommendations 4, 30, and 31, and updates to Immediate Outcomes 7–11, focusing on law enforcement powers, confiscation, targeted financial sanctions, TF, PF, NPOs.

The exercise provided a comprehensive platform for stakeholders to deepen their understanding of the revised standards, strengthen inter-agency coordination, and enhance Trinidad and Tobago’s readiness for future assessments under the FATF framework.

*LexisNexis Risk Solutions*

As part of preparations for Trinidad and Tobago’s 5th Round Mutual Evaluation (ME) by the CFATF, the OAG, in collaboration with LexisNexis Risk Solutions, hosted an Executive Breakfast Meeting on September 25th, 2025, at the Hilton Conference Centre, Port of Spain.

The session, themed “Combating Terrorism Financing: Strengthening Public-Private Collaboration to Address Emerging Threats,” brought together key public and private sector stakeholders to enhance national readiness and demonstrate commitment to international AML/CFT standards. Expert panellists from the Ministry of Homeland Security (MHS), FIB, TTPS, and the Central Bank of Trinidad and Tobago (CBTT) discussed evolving sanctions, regulatory expectations, and strategies to strengthen financial integrity.

Participants from both public and private sector gained valuable insights into regional terrorism and proliferation financing risks, best practices in compliance, and the importance of collaboration and international cooperation.

#### Anti-Terrorism Unit Guidance Documents

In support of the AML/CFT/CPF legislative framework the ATU continues to publish ongoing and updated documented guidance and policies and procedures, cooperation and coordination mechanisms via its website.



#### **ATU – Guidance Documents**

- [!\[\]\(92473622ee867e0f40880c7f4c6547e7\_img.jpg\) Guidance on the Risk of Abuse of NPOs for Terrorist Purposes July 2025.pdf](#)
- [!\[\]\(0df579cc779febd3c97e29f479a93bfb\_img.jpg\) Guidance to Listed Entities Subject to TFS July 2025.pdf](#)
- [!\[\]\(506da6981b1b5c8bd92da424018ce103\_img.jpg\) Guidance to Public on ATA July 2025.pdf](#)
- [!\[\]\(10a100c17a1d8bf6ac68b1902b849c36\_img.jpg\) Guidance to the Public on TFS in TT July 2025.pdf](#)

## Domestic and International Cooperation



Trinidad and Tobago's AML/CFT/CPF regime ensures national coordination and cooperation and demonstrate effective implementation of the FATF standards in the jurisdiction. The ATU, OAG continues to maintain strong and structured mechanisms for domestic and international co-operation on matters related to ML/TF and PF. These mechanisms include participation in global and regional bodies, formal mutual legal assistance arrangements, and operational-level information exchange platforms.



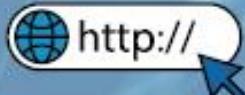
The OAG via the ATU has executed a number of Memoranda of Understandings (MOUs) with Barbados, Belize and Guyana. For the reporting period the ATU executed a MOU with Turks and Caicos Islands, and will continue to execute several other MOUs to allow for greater regional collaboration on TFS, counter-terrorism and proliferation financing matters. These MOUs are being utilised as mechanisms for efficient information exchange related to *inter alia* UNSCR 1373(2001) as it pertains to individuals and entities being considered for the application of TFS in accordance with FATF Recommendations 6 and 7.



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