

**Question for written answer E-003986/2025
to the Commission**
Rule 144
Michael McNamara (Renew)

Subject: Amendment to the delegated regulation in relation to third countries which have strategic deficiencies in their national anti-money laundering and countering the financing of terrorism regimes (high-risk third countries)

1. Recognising that a growing proportion of regulated entities rely on outsourced and cloud-based service providers operating across multiple jurisdictions – including jurisdictions that may be designated as high-risk – how does the amended delegated regulation¹ intend to address these dependencies?
2. Does the Commission plan to issue additional interpretative guidance to clarify supervisory expectations regarding due diligence, contractual oversight and business continuity planning for outsourcing arrangements involving high-risk third countries?
3. Given the significant role of cross-border trade, remittances and correspondent banking relationships for Ireland and other Member States, has the Commission undertaken a comprehensive impact assessment of the potential unintended consequences of high-risk third-country listings, particularly in relation to financial exclusion and de-risking, and what safeguards does it envisage to ensure that enhanced due diligence obligations remain proportionate and do not unduly disrupt legitimate economic activity?

Submitted: 10.10.2025

¹ Commission Delegated Regulation (EU) 2025/1184 of 10 June 2025 amending Delegated Regulation (EU) 2016/1675 to add Algeria, Angola, Côte d'Ivoire, Kenya, Laos, Lebanon, Monaco, Namibia, Nepal and Venezuela to the list of high-risk third countries which have provided a written high-level political commitment to address the identified deficiencies and have developed an action plan with the FATF, and to remove Barbados, Gibraltar, Jamaica, Panama, the Philippines, Senegal, Uganda and the United Arab Emirates from that list (ELI: http://data.europa.eu/eli/reg_del/2025/1184/2025-09-10 (http://data.europa.eu/eli/reg_del/2025/1184/2025-09-10)).