Le financement de la prolifération

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Le GAFI a ajouté en octobre 2020 à la Recommandation 1 une obligation d'évaluer les risques de financement de la prolifération. L'évaluation nationale des risques de financement de la prolifération réalisée par Singapour en 2024 a identifié le secteur DPT comme exposé, en raison de la dépendance de la Corée du Nord au vol de cryptos.[1] La PSN02 impose aux titulaires de licences d'évaluer et d'atténuer le risque de financement de la prolifération parallèlement aux risques de blanchiment d'argent et de financement du terrorisme. En pratique, les contrôles sont les mêmes que pour le respect des sanctions visant la RPDC. Ils comprennent le filtrage des adresses au regard des clusters attribués à Lazarus, la vigilance à l'égard des plateformes d'échange contreparties situées dans des juridictions aux contrôles faibles à l'égard de la RPDC et l'attention portée aux typologies documentées par le Groupe d'experts de l'ONU, comme le recours à des courtiers de gré à gré de la région pour convertir des jetons volés. L'évaluation des risques devrait le mentionner expressément, car les inspecteurs de la MAS (l'autorité monétaire et de surveillance financière) ont commencé à demander la section relative au financement de la prolifération comme un élément distinct.

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Notes

1. GAFI, modifications de la Recommandation 1 et de sa note interprétative, octobre 2020, imposant aux pays et aux établissements d'évaluer et d'atténuer le risque de financement de la prolifération ; Singapour, Proliferation Financing National Risk Assessment, 2024. ↩

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