



Global Organisation of 159 Financial Intelligence Units  
Combating Money Laundering and Terrorist Financing

# ANNUAL REPORT 2017/2018





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## Remarks by the Chair of the Egmont Group, Ms. Hennie VERBEEK-KUSTERS

JULY 2017 - PRESENT

This Egmont Group Annual Report is reporting on the year that I may count as my first (and only) full year being Chair of the Egmont Group of FIUs. It's been a fascinating year.

I can still, very clearly, recall the decision by the Heads of FIUs in Barbados (June 2015) to put focus in the Egmont Group on its operational work, not so much on discussions on the organisation itself and its set of rules anymore. And that's exactly what we've been doing since then.

I'm still very happy with the decision of the Heads of FIUs to adopt a thematic approach for the Egmont Group's Plenary Meetings. This has helped us to bring more focus in our activities and discussions.

It has led to two very important and interesting meetings over the past year: the meetings in Buenos Aires (March 2018) that were dedicated to the unique role of FIUs in addressing money laundering of the proceeds from corruption and the 25<sup>th</sup> Egmont Group Plenary Meetings in Sydney (September 2018) on the FIU's perspective on Public Private Partnerships. We managed to have active discussions in the thematic sessions, with participation from around the floor.

In this reporting year we managed to produce a paper on FIUs' operational autonomy and independence, a list of indicators for the reporting entities regarding the proceeds of corruption and guidelines for FIUs that wish to enter into public private partnerships. On top of that we have been able to welcome the adoption of a joint paper with the FATF on concealment of beneficial ownership.

We have been able to welcome four new members to our Group, which brings the membership now to 159. Unfortunately, we had to suspend a member also.

In this annual report you may find an overview of all of the activities conducted by the four Working Groups as well as the Regional Groups.

We have been looking forward to the future of the Egmont Group by discussing and agreeing to the new Strategic Plan for the Group that contains four objectives:

- » to facilitate bilateral and multilateral exchanges of operational information;
- » to strengthen FIUs' capabilities;
- » to expand the Group's field of knowledge; and
- » to develop new partnerships.

We've agreed that for effective information exchange between FIUs we must move from bilateral to multilateral cooperation to be able to add value to AML and CFT. In order to achieve that, we must identify the state of play of the IT facilities for our group and move forward with a plan to enhance those facilities.

ECOFEL has started to move forward and to play its important role as an operational arm of the TATWG to support and strengthen FIUs.

As a Group we contribute to the expertise on AML/CFT and we are willing and able to share that with the partner organisations.

I'm very proud that during the last year I have been invited to represent the Egmont Group at several events and that both our Executive Secretary, myself and other members of the Egmont Committee have been able to contribute to those meetings. I believe it to be important to communicate on FIUs and the Egmont Group.

We have achieved a lot, and still a lot can be accomplished. For both it is evident that we could not and cannot do that without the excellent work of our Executive Secretary Jérôme Beaumont and his team and by the members of the Egmont Committee. Thank you all!

Let me conclude by wishing you a pleasant time reading this annual report.

### Ms. Hennie Verbeek-Kusters

Chair of the Egmont Group of Financial Intelligence Units



## Remarks by the Executive Secretary, Mr. Jérôme BEAUMONT

SEPTEMBER 2016 - PRESENT

This year represented a period of growth and prominent development for the Egmont Group. Under the leadership of our Chair, Ms. Hennie Verbeek-Kusters, we saw a vision realized through the endorsement of our new Strategic Plan, the physical establishment of the Egmont Centre of FIU Excellence and Leadership, and the confirmation to relocate the organisation's Secretariat.

The adoption of a new Strategic Plan saw the Group align along four objectives: to facilitate bilateral and multilateral exchanges of operational information; to strengthen FIUs' capabilities; to expand the Group's field of knowledge; and to develop new partnerships.

These strategic objectives will help the organisation realize its goals, maximize its reach, and further support our members for the years to come.

During this reporting period, the Heads of FIU endorsed a decision to relocate the Egmont Group Secretariat. We look ahead with anticipation to the opportunities this move will offer us.

ECOFEL is now up and running and successfully published its first paper 'Understanding FIU Operational Independence and Autonomy', a document that works to reinforce the core principles that impact an FIU's efficiency and overall effectiveness.

In addition to this, the Group continued with its commitment to equip its members with the operational tools and training they need to tackle the threat of financial crime. Within this report you may find details of the activities and projects led by each of our Working and Regional Groups.

### OF NOTE ARE TWO REPORTS THAT WERE PUBLISHED FOR EXTERNAL USE:

- » The Concealment of Beneficial Ownership - joint research by the Information Exchange Working Group (IEWG) and FATF. An analysis of the risks and mechanisms used to obscure beneficial ownership.
- » Set of Indicators for Corruption Related Cases - a valuable report that can assist financial institutions and other front-line reporting entities in the identification of corruption and the laundering of the proceeds of corruption.

But more importantly, our 159 Members FIU have been, on a daily basis, exchanging operational information through Egmont Secure Web, underlining the very operational nature of our Group.

This annual report will help us look back on the achievements we gained, whilst appreciating the strategic steps that were taken to help advance and strengthen the Egmont Group.

### Mr. Jérôme Beaumont

Executive Secretary of the Egmont Group of FIUs

# The Egmont Group Developments 2017-2018 at a Glance

## HIGHLIGHTS

### Work Completed

- » Endorsement of the 2018-21 Egmont Group Strategic Plan
- » FIUs working with law enforcement agencies report
- » STR Reporting Regime: Updating and promoting the use of the Egmont Group STR template
- » Concealment of Beneficial Ownership Report
- » Set of Indicators for corruption related cases
- » Internal Guidance on Emerging Financial Technologies: A Typology of Virtual Currencies

### Work Started

- » Human Trafficking awareness project to strengthen AML/CFT understanding
- » Business Email Compromise Phase II: identifying perpetrators and associated ML networks
- » Development of Key Egmont Group terminology glossary for the benefit of membership, international partners and observers
- » FIU-Customs Cooperation Handbook
- » Assessment and identification of professional ML facilitators and related cross-border ML risks

## MEETINGS

### 4 Meetings with 797 Participants



Meeting Buenos Aires



Meeting Sydney

## MEMBERSHIP



### New member FIUs endorsed:

- FIU, Azerbaijan
- CENTIF, Benin
- ANIF, Congo Brazzaville
- FIC, Zambia



### One member suspended:

- UIF, El Salvador



### One member readmitted:

- NFIU, Nigeria

## TRAINING AND WORKSHOPS

11 Training Sessions and Workshops delivered by the TATWG and ECOFEL.

Over 270 participants, with topics including:

- Professional ML Networks
- Corporate Vehicles and Financial Products (CorFin)
- Strategic Analysis Course (SAC)
- Virtual Currency Regulation and Analysis
- ECOFEL FIU Operational Independence and Autonomy Workshop
- Cyber and Emerging Technologies
- FIU Working with Law Enforcement Agencies

## OPERATIONAL DATA

### Operations in numbers\*

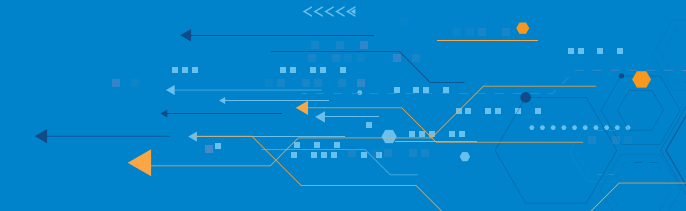
<b>22,532</b>	exchanges of information by Egmont Group member FIUs
<b>27.9M</b>	STR/SAR/UAR received by Egmont Group members
<b>488M</b>	Other reports received by Egmont Group members

### Types of FIU

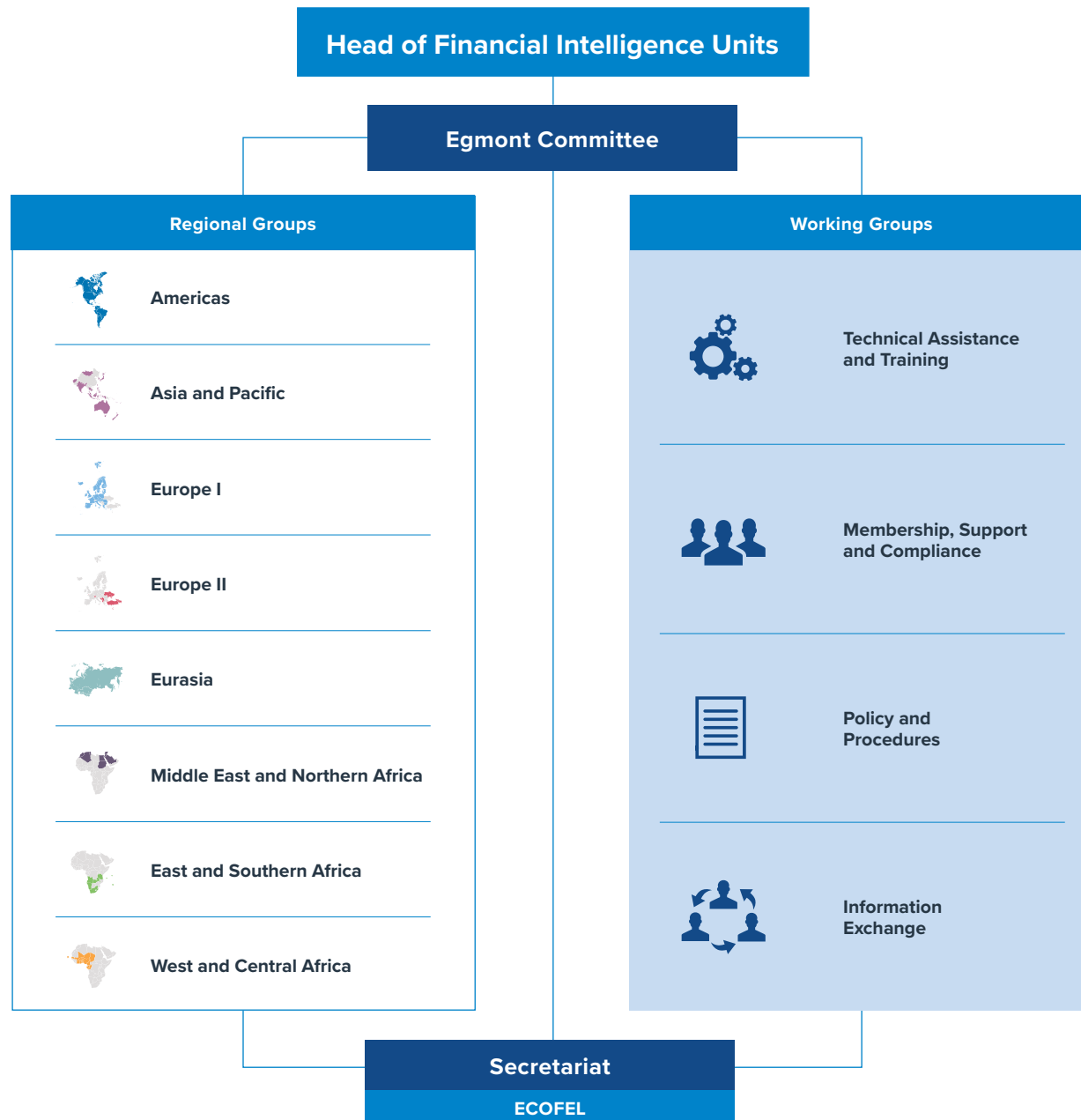
<b>119</b>	ADMINISTRATIVE
<b>15</b>	HYBRID (Administrative/Law Enforcement)
<b>19</b>	LAW ENFORCEMENT
<b>4</b>	HYBRID (Judicial/Law Enforcement)
<b>2</b>	JUDICIAL

\* Data from the 2017 Egmont Biennial Census. The next EBC is scheduled for delivery in 2019.





## STRUCTURE



## MANDATES

### THE HEADS OF FINANCIAL INTELLIGENCE UNITS (HOFIU)

Governing Body

Establish the mandate and priorities of the organisation and make decisions on any developments affecting the group's membership, structure, budget, and principles. The HoFIU may delegate specific authorities in order to expedite certain decisions, enhance effectiveness, and streamline issues before HoFIU consideration.

### THE EGMONT COMMITTEE (EC)

Advisory Body

Serves as the consultation and coordination mechanism for the HoFIU, the Regional Groups and the Working Groups. Led by the Chair of the Egmont Group, it is comprised of the Working Group Chairs, the Regional Representatives, the ESW Representative, and the Executive Secretary.

The EC has responsibility for decision-making in areas delegated by the HoFIU. The EC is responsible for ensuring the horizontal and vertical cohesion of the work of the Egmont Group.

### WORKING GROUPS (WGs)

Operational Bodies

Created by the HoFIU upon the recommendation of the EC, their activities are mandated in line with the Egmont Group's strategic plan.

### REGIONAL GROUPS (RGs)

Regional Representation

Provide support to member FIUs in their respective regions and represent their members in the EC with regards to compliance matters, and other issues of importance.

### THE EGMONT GROUP SECRETARIAT (EGS)

Administrative, Strategic, and Technical Support

Provides strategic and administrative support to the HoFIU, the EC, the WGs, the RGs, and assists with content management on the open areas of the ESW. The EGS is headed by the Executive Secretary whose appointment is endorsed by the HoFIU, and reports directly to the Chair of the Egmont Group.

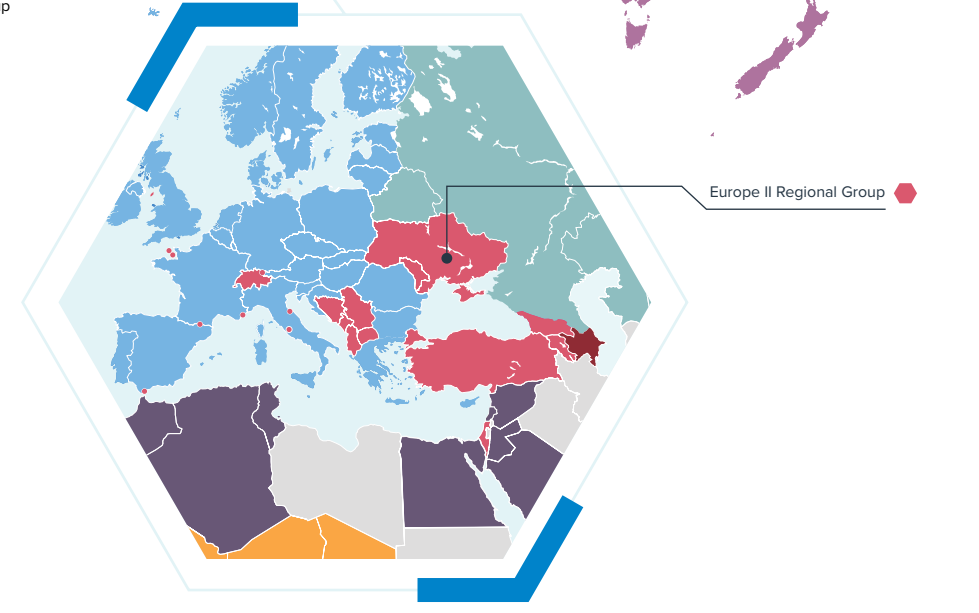
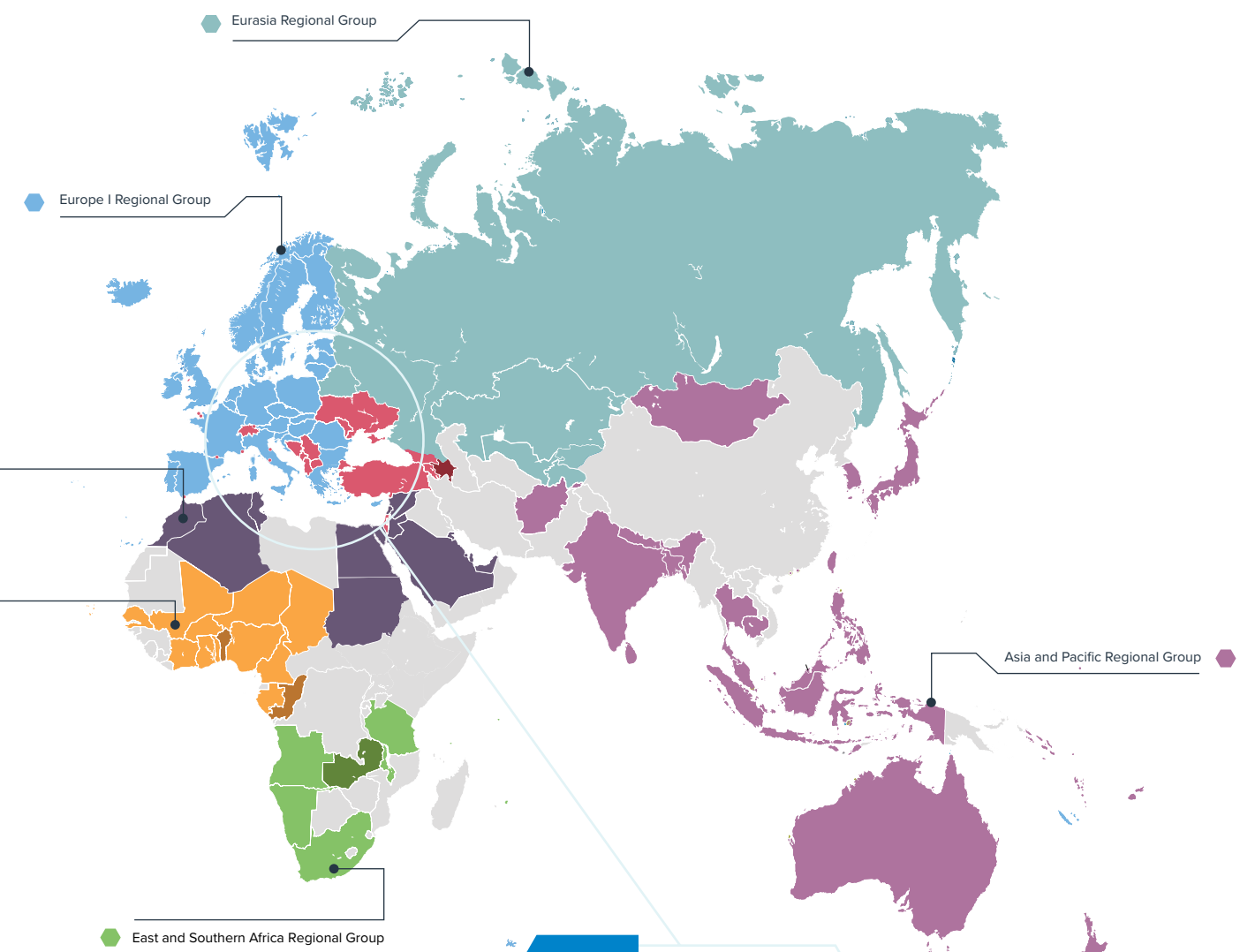
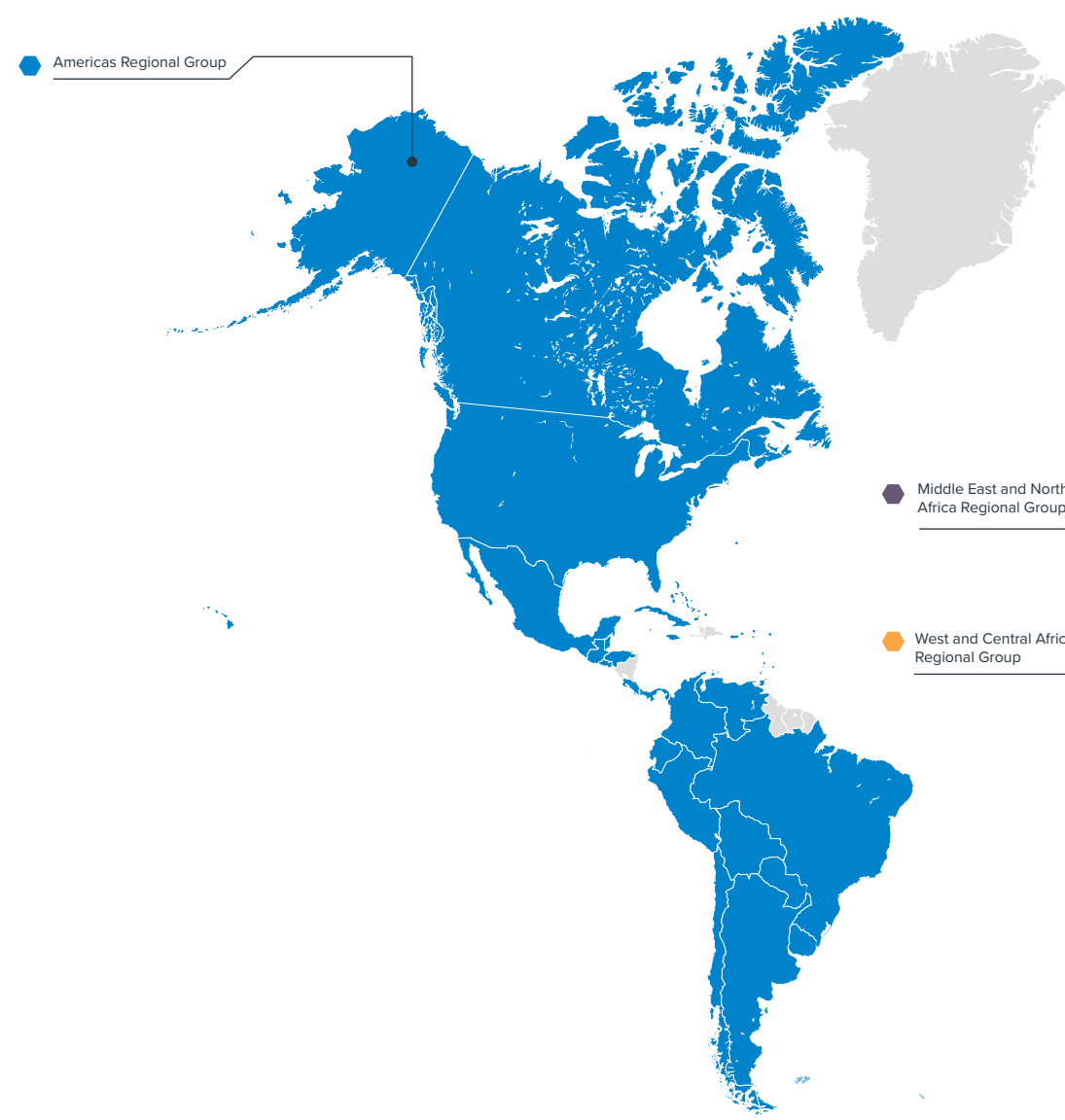
### ECOFEL

The Egmont Centre of FIU Excellence and Leadership is an operational arm of the Technical Assistance and Training Working Group. It is fully integrated in the Egmont Group and is located within the Egmont Group Secretariat.

### EGMONT GROUP SECURE WEB (ESW)

Secure Communications  
(Not represented on page 10)

An electronic communication system that provides an encrypted platform for members to communicate electronically and share financial intelligence, as well as other information of interest. Such information is able to be shared amongst Egmont Group members. The ESW is critical to the functioning of the Egmont Group.



**MEMBERSHIP**

During the reporting period, the Egmont Group welcomed four new members. Membership now stands at a total of 159 FIUs.

**Distribution of FIUs by region**

REGIONAL GROUPS	# OF FIUS
Americas Regional Group	38
Asia and Pacific Regional Group	27
East and Southern Africa Regional Group	8
Eurasia Regional Group	6
Europe I Regional Group	30
Europe II Regional Group	23
Middle East and Northern Africa Regional Group	13
West and Central Africa Regional Group	14

**Areas of Focus**

With almost 160 members, the Egmont Group has become a truly global organisation. However, more work is necessary to reach FIUs in Africa and Asia that would gain from joining the Group.

Through the outreach and activities of ECOFEL, the Egmont Group supports candidates with training and technical assistance whilst on their way to becoming members.

# Egmont Group Strategic Plan 2018 – 2021

During the 25<sup>th</sup> Egmont Group Plenary in September 2018, the HoFIU endorsed a new Strategic Plan. This Plan outlines the organisation's vision for the years ahead. It details how over the next three years, the Egmont Group will focus on the global nature of its reach, work to enhance information exchange, and strengthen the capabilities of its members.



The Egmont Group Strategic Plan 2018-2021 is available at: <http://bit.ly/EG-Strategic-Plan>

## Vision, Mission, and Values

### The Egmont Group is...

- » based upon mutual trust, fairness, and reciprocity.
- » focused on the proactive sharing of operational and strategic information.
- » sustained by the free commitment of its members.
- » visionary in its ability to anticipate emerging challenges.
- » nimble in its use of policy instruments at national and international levels.
- » sensitive to the diversity of its members.

## Strategic Objectives



### BILATERAL AND MULTILATERAL EXCHANGES OF FINANCIAL INFORMATION

Increase volume and quality with a focus on exchange mechanisms,



### DEVELOP NEW PARTNERSHIPS

Leverage non-traditional partnerships to increase knowledge and influence.



### STRENGTHEN FIUs' CAPABILITIES

Promote excellence and leadership through ECOFEL.



### EXPAND THE GROUP'S FIELD OF KNOWLEDGE

Keep the Group updated on the changing financial landscape.

## Strategic Initiatives: Four Areas of Focus



### ECOFEL

We are better equipped to improve the performance of our members.



### AFRICA & ASIA

More work needed to reach FIUs in Africa and Asia who would gain from joining the EG.



### TECHNOLOGY

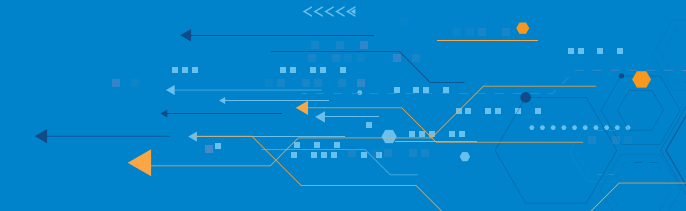
Must assess our needs so we can improve current technology used within the EG.



### WG THEMATIC WORK

We will continue to intergrate the important thematic work of our WGs.





## REPORTS AND PUBLICATIONS

During the reporting period the Egmont Group finalized multiple operational projects. The most prominent included:

### Concealment of Beneficial Ownership

While corporate vehicles, such as companies, foundations, partnerships, and other types of legal persons and arrangements are important for supporting commercial and entrepreneurial activity, they can also be misused to conceal the ownership and control of illicitly gained assets.

Together, the Egmont Group IEWG and FATF carried out research to better understand the risks and mechanisms used to hide and obscure beneficial ownership of companies, trusts, etc., with a particular focus on the role of professional intermediaries in setting up and maintaining these structures.

Based on more than **100 case studies** provided by **34 different jurisdictions**, the final report outlines:

- » An overview of **11** key techniques and methods used to conceal beneficial ownership.
- » An analysis of **14** common vulnerabilities.
- » **26** sources of information and techniques that reveal beneficial ownership.
- » Over **100** risk indicators relevant to the concealment of beneficial ownership.

Full report: <http://bit.ly/Concealment-Beneficial-Ownership>

### Set of Indicators for Corruption Related Cases

Corruption is a pervasive crime that affects all countries and economies. In addition to hindering economic growth, corruption erodes trust in governments, diverts government resources away from important initiatives, and impacts the delivery of vital services, such as health care, national infrastructure, and education. As a result, financial intelligence plays a vital role in detecting and prosecuting corrupt activities.

In order to enhance the intelligence available to FIUs, it is important for FIUs and law enforcement to work with financial institutions and other front-line reporting entities to improve the identification of suspicious transactions and activities indicative of corruption.

To facilitate this work, the Egmont Group Information and Exchange Working Group (IEWG) has compiled a set of **more than 50 indicators** that may, when considered in the context of a transaction or customer interaction, assist in the identification of corruption and of the laundering of the proceeds of corruption.

The set of indicators is not an exhaustive list and will be amended and supplemented in accordance with feedback received from Egmont Group members, Observers, International Partner Organisations, different competent authorities, and reporting entities.

Full report: <http://bit.ly/EG-Corruption-Indicators>

### Understanding FIU Operational Independence and Autonomy

An operationally independent and autonomous FIU is essential to an effective anti-money laundering and counter financing of terrorism (AML/CFT) regime. FIUs play a central role by providing financial information and intelligence that supports the work of law enforcement authorities, AML/CFT supervisors, and foreign counterparts. A lack of autonomy or operational independence undermines not only the effectiveness of the FIU's activities but also has an impact upon national money laundering (ML) and terrorist financing (TF) investigations, and prosecutions.

Recognizing the importance of this subject, the Egmont Group Heads of FIU tasked the **Egmont Centre of FIU Excellence and Leadership (ECOFEL)** with the responsibility of producing a document that defines the characteristics of an operationally independent and autonomous FIU.

Understanding FIU Operational Independence and Autonomy is a paper that will assist governments (decision and policy makers), FIUs, and Key stakeholders in identifying the features of an independent and autonomous FIU, regardless of its structure or the type of legal system it exists within. The paper is not intended to set a new standard, nor does it discuss strategies to achieve these characteristics. The paper includes an FIU self-assessment and is currently available in **six languages** (Arabic, English, French, Latvian, Spanish, and Russian).

Full publication: <http://bit.ly/ECOFEL-UFOIA>

## ROLE OF FIUs IN PUBLIC-PRIVATE PARTNERSHIPS

The 25<sup>th</sup> Egmont Group Plenary theme was Public-Private Partnerships (PPPs). Recognizing the importance of private and public sector cooperation in the joint fight against financial crime, the Egmont Group plenary addressed the topic of an FIU's role in public-private partnerships (PPPs). The main outcomes of these discussions can be divided into the three areas of context, opportunities, and challenges:

### Context

- » Forming a PPP is not a goal in itself;
- » No one size fits all! PPPs around the globe vary in:
  - Form;
  - Size;
  - Objectives;
  - Scope of the exchanged information;
  - Maturity level.
- » PPPs should:
  - complement the existing STR/SAR reporting regime;
  - be set up in co-creation, starting strategically and taking small steps;
  - be based on mutual trust and orientated to answer the needs of the FIUs;
  - be goal-oriented on priorities, create mutual benefits and add value to all partners.

### Opportunities

- PPPs could:
- » enhance trust in the relationship with the private sector;
  - » enhance the quality of reporting and additional informational input;
  - » help in designing common approaches, and identifying desired deliverables;
  - » foster access to information;
  - » enhance the level of expertise and knowledge for all partners;
  - » facilitate increased feedback to reporting entities;
  - » provide more flexibility, agility and opportunities to adjust to the fast-changing ML/TF threat environment;
  - » provide better understanding of ML/TF risks;
  - » provide advice on possible ways to enhance the existing AML/CFT framework;
  - » enhance the quality of analytical products (timeliness/relevance);
  - » lead to development of new (non-traditional partnerships) – both with private sector as well as public sector partners.

### Challenges

**Legislative** – amendments in legislation might be needed to allow partners to achieve their objectives;

**Security** – protection of (classified) information and privacy of individuals;

**Technology** – compatibility of software between partners may hamper the timely exchange of (specific) information;

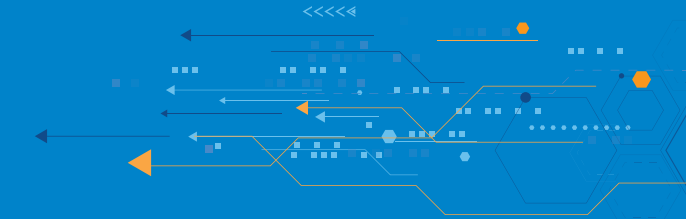
**Capabilities/Knowledge** – differences in level of expertise;

**Cross-border** – sharing of foreign intelligence within PPPs and cross-border sharing between PPPs;

**Costs** – prioritization of resources;

**Communication** – sharing the appropriate information at the right moment with the appropriate partners;

**Practical** – ownership of information, selecting the relevant organisation, bringing together the relevant experts, etc.



## WORKING GROUP DEVELOPMENTS

### Information Exchange Working Group (IEWG)

The IEWG continued its mission to provide Egmont Group members with opportunities to work together and develop solutions for enhancing the quality and timeliness of the financial intelligence collected and shared between FIUs and with other partners.

The IEWG is chaired by Mr. Marko Stolle (FIU, Germany) with the following Vice-Chairs: Dr. Youssef El Omary (UTRF, Morocco), Ms. Alexandra Bobylkova (Rosfinmonitoring, Russia), Mr. Dian Ediana Rae (PPATK, Indonesia), Mr. Elad Wieder (IMPA, Israel), Mr. Ken O' Brien (FinCEN, USA), Ms. Heather Moye (FinCEN, USA). The group acknowledges the valuable contribution of Mr. Peter Clark (AUSTRAC, Australia) who acted as Chair during the first half of this reporting period.

As a result of these meetings, the IEWG currently presents itself as follows:

#### STREAM 1 Operational Information Exchange

Developing solutions to issues faced by FIUs in exchanging information.

#### STREAM 2 Multilateral work on key ML/TF issues

Harnessing the success of previous multilateral information sharing projects to solve difficult ML/TF problems.

#### STREAM 3 Understanding changes and emerging ML/TF risks in the environment

Studying the changing environment and designing strategies to overcome identified risks.

#### STREAM 4 Enhancing data analytics and effective communications

Embracing innovation in technology to enable FIUs to be agile, responsive, and effective when exchanging and exploiting information.

#### STREAM 5 Information Technology Enablers

Maximising the Egmont Group's IT expertise to ensure business continuity.

#### STREAM 6 National Security Risks

Increasing the abilities of FIUs to cooperate and exchange information with national security agencies.

In addition to this, the IEWG agreed on its new annual Business Plan (2018 – 2019), which was endorsed by the Egmont Group during the 25<sup>th</sup> Egmont Group Plenary in Sydney, Australia. The Business Plan is based on a stocktaking exercise conducted by the IEWG amongst its members, in order to identify the main objectives and priorities of the group.

### IEWG Projects

During the reporting period, IEWG project teams led and completed the following projects, which were endorsed by the HoFIU:

- » FIUs working with Law Enforcement Agencies;
- » STR Reporting Regime;
- » Concealment of Beneficial Ownership Report;
- » Emerging Financial Technologies, Money Laundering and Terrorist Financing: A Typology of Virtual Currencies; and
- » Set of Indicators for Corruption Related Cases.

The IEWG has also commenced and progressed work on the following projects:

- » **Flexible, consistent, information exchange standards** – project aimed at enhancing data analytics and the effectiveness of Egmont Group's financial intelligence exchange mechanisms.
- » **Lone actors and small cells** – an ongoing Egmont initiative to identify and analyse terrorism financing methodologies specifically related to lone actors and small terrorist cells.
- » **Identification of professional ML facilitators and assessment of related cross-border ML risks** – a core objective of this project is to deliver risk indicators that can be used for cross-border financial transaction analysis.
- » **Human Trafficking Project** – project aimed at strengthening AML/CFT awareness and understanding of human trafficking.
- » **Business Email Compromise (BEC) Phase II** – finding ways for financial and cyber information to help identify BEC perpetrators and their associated ML networks.
- » **Egmont Group Public website renovations** – focus on developing the Egmont Group website to meet the needs of all key stakeholders.
- » **FIU Customs Cooperation Handbook Project** – a project to help foster greater cooperation between FIUs and customs authorities.
- » **FIU Typologies on Money Laundering of the Proceeds of Corruption** – work to help FIUs better understand corruption-related risks.

The achievements and ongoing work of the IEWG demonstrate the group's dedication and commitment to delivering practical and operational work that is relevant to FIUs and their partners across the globe.

### Membership, Support, and Compliance Working Group (MSCWG)

According to the mandate given by the Heads of FIU (HoFIU), this working group has the important role of considering and processing applications from FIUs seeking Egmont Group membership, as well as managing membership issues and implementing the Support and Compliance Process as endorsed by the HoFIU.

During this reporting period, the MSCWG was chaired by Mr. Stiliano Ordolli (MROS, Switzerland) with the following Vice-Chairs: Ms. Silvina Rivarola (FIU, Argentina), Mr. Ahmed Elbashari (FinCEN, USA), and Mr. Abdelsattar Elnajar (EMLCU, Egypt).

With the crucial support of sponsors and legal experts from other Egmont Group members, the MSCWG reviewed the membership applications of a number of FIUs and recommended to the HoFIU the admission of the following FIUs as members of the Egmont Group: Zambia, Republic of Congo, Benin, Turks and Caicos, and Azerbaijan (noting the last two were required to reapply for membership due to significant changes in the structure of the FIUs).

Under the Egmont Group's Support and Compliance Process, the MSCWG has continued to address concerns in relation to the legal framework of two FIUs. After providing the necessary guidance required to address the limitations related to its operational independence and autonomy, the MSCWG recommended the HoFIU lift the suspension of FIU Nigeria after implementation of necessary legislative changes. In addition, the MSCWG recommended to the HoFIU the suspension of FIU El Salvador due to its continuous lack of compliance with Egmont Group principles related to operational independence and autonomy. The suspension resulted in a ban from participating in Egmont Group activities and denial of access to the ESW.

Furthermore, the MSCWG continued with the review of FIUs that were referred by the Egmont Committee under the Support and Compliance Process, which is based on red flags identified from FATF Mutual Evaluation Reports (Recommendations 29 and 40).

Lastly, following its recently adopted Business Plan 2018-2019, the MSCWG will be focusing on the following areas over the coming months:

- » Continue supporting and monitoring the membership processes of candidate FIUs, with support from the MSCWG Pool of Experts.
- » Further work on reviews and providing FIUs support based on the Support and Compliance Process.
- » Enhance the current MSCWG Pool of Experts, considering a regional approach, in order to assist with the Support & Compliance issues.

### Policy and Procedures Working Group (PPWG)

The Policy and Procedures Working Group has continued to provide a forum where Egmont Group FIUs can address important corporate issues while focusing their efforts on setting the operational policy of the organisation. In pursuance of its mandate, the group promoted the understanding of the Egmont Group's principles, facilitated their common interpretation and uniform application, and provided assistance to other Egmont bodies and members on legal issues, whilst following legal or regulatory work of interest conducted in other international fora.

The PPWG is chaired by Mrs. Anne Mette Wadman (EFE, Norway) with the following Vice-Chairs: Mrs. Elvira Kross (MOT, Aruba) and Mr. Pekka Vasara (RAP, Finland). The group acknowledges the valuable contribution of Mrs. Noora Bahar (QFIU, Qatar) and Mrs. Claudia D'Esposito (MROS, Switzerland) who acted as Chair and Vice-Chair during the first half of the reporting period.

As the custodian of core Egmont Group documents, the PPWG ensured that they remain consistent with the EG Strategic Plan and continue to be relevant to the global anti-money laundering / countering the financing of terrorism environment.

During the period 1 July 2017 – 30 September 2018, the PPWG project teams:

- » Created the framework for the development by the Egmont Committee of the 2018-2021 Egmont Group Strategic Plan;
- » Developed a new succession planning model for the Chair of the Egmont Group that entails the creation of two new Egmont Group Vice Chair positions, while maintaining the Chair's mandate at two years;
- » Reviewed the terms of reference and the selection procedure for the Chair of the Egmont Group and developed terms of reference and selection procedures for the newly created Egmont Group Vice Chair positions;
- » Revisited the Egmont Group's Support and Compliance Process and reviewed its Procedural Trigger 3 to consider Mutual Evaluation reports (MERs) effectiveness findings when determining whether member FIUs comply with the Egmont Group requirements listed in the Egmont Group Charter and Principles for Information Exchange;
- » Developed an Egmont-FATF Engagement Framework that identifies the main areas of cooperation between the two organisations and proposes actions to enhance the synergies between them;
- » Looked into the matters impacting on FIU autonomy and operational independence and contributed to the development of a paper that will assist governments (decision and policy makers), FIUs, and key stakeholders in identifying the features of an independent and autonomous FIU;
- » Conducted an organisation-wide needs assessment for translating Egmont Group documents and prepared, together with the Egmont Group Secretariat, a budget proposal that was approved by the HoFIU.

Starting in March 2018, with the selection of the new leadership, PPWG developed a new business plan. The 2018-2019 PPWG Business Plan acknowledges the role of the group in identifying important operational policy and strategic issues affecting the Egmont Group and coordinating a response across the organisation and with partner bodies. To maximise its contribution to the strategic vision of the Egmont Group, PPWG looked into its mandate and decided to focus its efforts on the following activities:

Egmont Strategic Objective	PPWG Projects
<b>Facilitate Bilateral and Multilateral Exchanges of Financial Information between FIUs</b>	<ul style="list-style-type: none"> <li>» Addressing impediments to bilateral and multilateral information sharing between FIUs, identified through previous operational work</li> <li>» Developing a Glossary of key Egmont Group Terminology</li> </ul>
<b>Strengthen FIUs' Capabilities</b>	<ul style="list-style-type: none"> <li>» Understanding the Role of FIUs in Countering Financing of Proliferation</li> <li>» Ensuring consistency between Egmont Group expectations for candidate FIUs and for members</li> <li>» Revising the Egmont Group Support and Compliance Process - Procedural Trigger 4 (<i>Limited Statistical Review</i>)</li> </ul>
<b>Develop New Partnerships</b>	<ul style="list-style-type: none"> <li>» Understanding better the FIU Boards – context, opportunities, challenges</li> <li>» Developing an Egmont Additional Voluntary Contributions Program</li> </ul>

PPWG continues to seek, through its policy development and projects, to ensure FIUs exchange intelligence and expertise in ways that meet the challenges stemming from the money laundering and terrorist financing environment.

## Technical Assistance and Training Working Group (TATWG)

The Technical Assistance and Training Working Group (TATWG) continued its important work on developing and delivering technical assistance and training to both Egmont Group member and non-member FIUs worldwide.

The TATWG is chaired by Mr. Amr Sayed (EMLCU, Egypt) with the following Vice-Chairs: Mr. Phil Hunkin (CIFIU, Cook Islands), and Mr. Stephen John (FINTRAC, Canada).

### ECOFEL

The Egmont Centre of FIU Excellence and Leadership (ECOFEL), funded by UK aid from the UK Government and the State Secretariat for Economic Affairs (SECO), became operational in April 2018 and is an arm of the TATWG. TATWG, via the Egmont Centre of FIU Excellence and Leadership (ECOFEL), aims to:

- a. Develop resources and share expertise and best practices amongst FIUs.
- b. Introduce new and innovative tools for FIU operations and development.
- c. Build and strengthen networks within the AML/CFT community of professionals.
- d. Strengthen coordination with international partner organisations.
- e. Empower FIUs to position themselves domestically, regionally, and internationally as leaders.

The TATWG acknowledges the contribution and ongoing support of the ECOFEL Program Team (EPT): Ms. Becky Besong (NAFI, Cameroon), Ms. Francisca Brito (FIU Angola), Ms. Laura Galer (FIU Romania), and Mr. Ashitei Trebi-Olenu (FIU Ghana).

### Other deliverables

Although ECOFEL was a significant priority of the TATWG, the Group continued with the development and delivery of other training programs and projects for the benefit of FIUs worldwide. Some examples of the group's work include, but are not limited to:

- » **e-learning** – The Egmont Group, in cooperation with the International Asset Recovery Centre, officially launched its online training program for FIU analysts. The first training product made available was the Operational Analysis Course (OAC) in English, French, Latvian, and Spanish, and can be used by all Egmont members and non-members. This new initiative is available at: <https://forum.assetrecovery.org/elearning/courses/operational-analysis>;
- » **Corporate Vehicles and Financial Products (CorFin)** – CorFin aims at increasing FIU personnel knowledge of the international financial and corporate sectors, to better respond to threats reflected by cases like “Mosaack Fonseca” or “Paradise Papers”. The course is focused on advanced tactical analysis techniques involving corporate vehicles and financial products and increases awareness over trusts, legal arrangements, beneficial ownership and other related issues;

» **Plenary Training events** – The TATWG organised several training sessions during the HoFIU intersessional and the Egmont Group Plenary meetings during this period. The topics covered focused on FIU Autonomy and Operational Independence, Virtual Currency Regulation and Analysis, Cyber & Emerging Technologies, Professional ML Networks, and FIU Working with Law Enforcement Agencies;

» **Best Egmont Case Award (BECA)** – As part of the annual plenary event, the TATWG leads the initiative to determine the BECA. For the reporting year, the BECA competition was conducted together with the World Bank's Stolen Asset Recovery Initiative (StAR). The TATWG would like to congratulate FIU Ukraine (SDFM) for winning the BECA, and also UIF Italy and UIF Peru for winning the World Bank StAR award.

These achievements demonstrate the dedication and professionalism of the TATWG in its pursuit of improving the abilities of FIUs worldwide to combat ML/TF. Furthermore, the contributions and support of the international community, through many international observers and participants to the Egmont Group meetings, are essential in helping the TATWG meet the needs of the membership.

## REGIONAL GROUP DEVELOPMENTS

### Americas Regional Group

The Americas Regional Group is made up of FIUs from jurisdictions that are members of the Caribbean Financial Action Task Force (CFATF) or the Financial Action Task Force of Latin America (GAFILAT). During the reporting period, 38 FIUs were members of the Americas Regional Group.

The Americas Regional Group is chaired by Mr. Mariano Federici (UIF, Argentina) and Mr. Luc Beaudry (FINTRAC, Canada).

#### HIGHLIGHTS OF THE ACTIVITIES IN THIS REGIONAL GROUP INCLUDED:

- » UAFE-Ecuador held a workshop with the Financial Intelligence Unit of Peru, on the transfer of Money Laundering Experiences. The Workshop took place on November 28, 2017, in Quito, Ecuador. It registered a total of 65 participants from different national control agencies as well as civil servants from the Financial and Economic Analysis Unit (UAFE) of Ecuador. During this training session, four main themes were addressed:
  - The general framework of the Egmont Group of FIUs.
  - Egmont Group Membership Procedures, Support and Compliance.
  - Information Exchange Principles for Egmont Group FIUs.
  - ML/FT Risk Assessment, Policy and National Plan Against ML/FT - The Peruvian Experience.
- » FIU St. Vincent and the Grenadines, with sponsorship from the Cooperating and Supporting Nations (COSUNs) of the CFATF, and in collaboration with the CFATF, successfully hosted a national workshop under the theme "International Standards on Combatting Money Laundering and the Financing of Terrorism and Proliferation: FATF Recommendations".
- » UNIF, Venezuela made a presentation on Prevention, Control and Detection of Money Laundering and Terrorist Financing (ML/TF) in Venezuela, given to attendees of the International Tourism Fair of Venezuela (FITVEN).
- » FINTRAC and FinCEN, in collaboration with ECOFEL and the Financial Intelligence Unit of Trinidad and Tobago (T&T FIU) are developing a practical, hands-on strategic analysis course to FIUs of the CFATF region, where analysts will be invited to collectively develop a strategic analysis operational product for use in their jurisdictions.
- » During this reporting period, FIUs from the Americas Regional Group signed 14 MoUs with Egmont Group members.

### Asia and Pacific Regional Group

The Asia and Pacific Regional Group is comprised of FIUs from jurisdictions that were members of the Asia and Pacific Group on Money Laundering (APG). During the reporting period, 27 FIUs were members of the Egmont Asia and Pacific Regional Group.

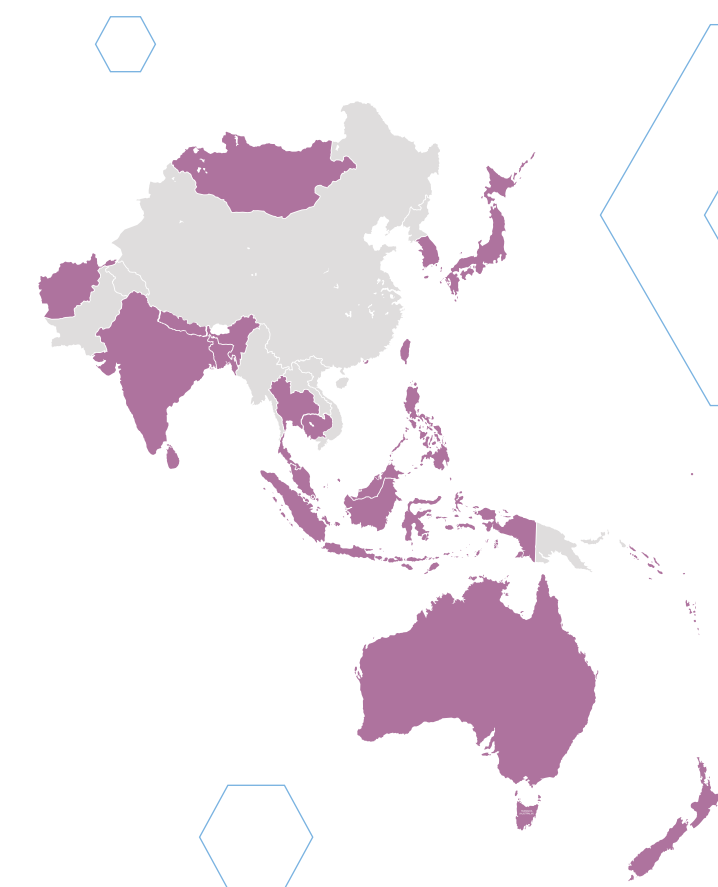
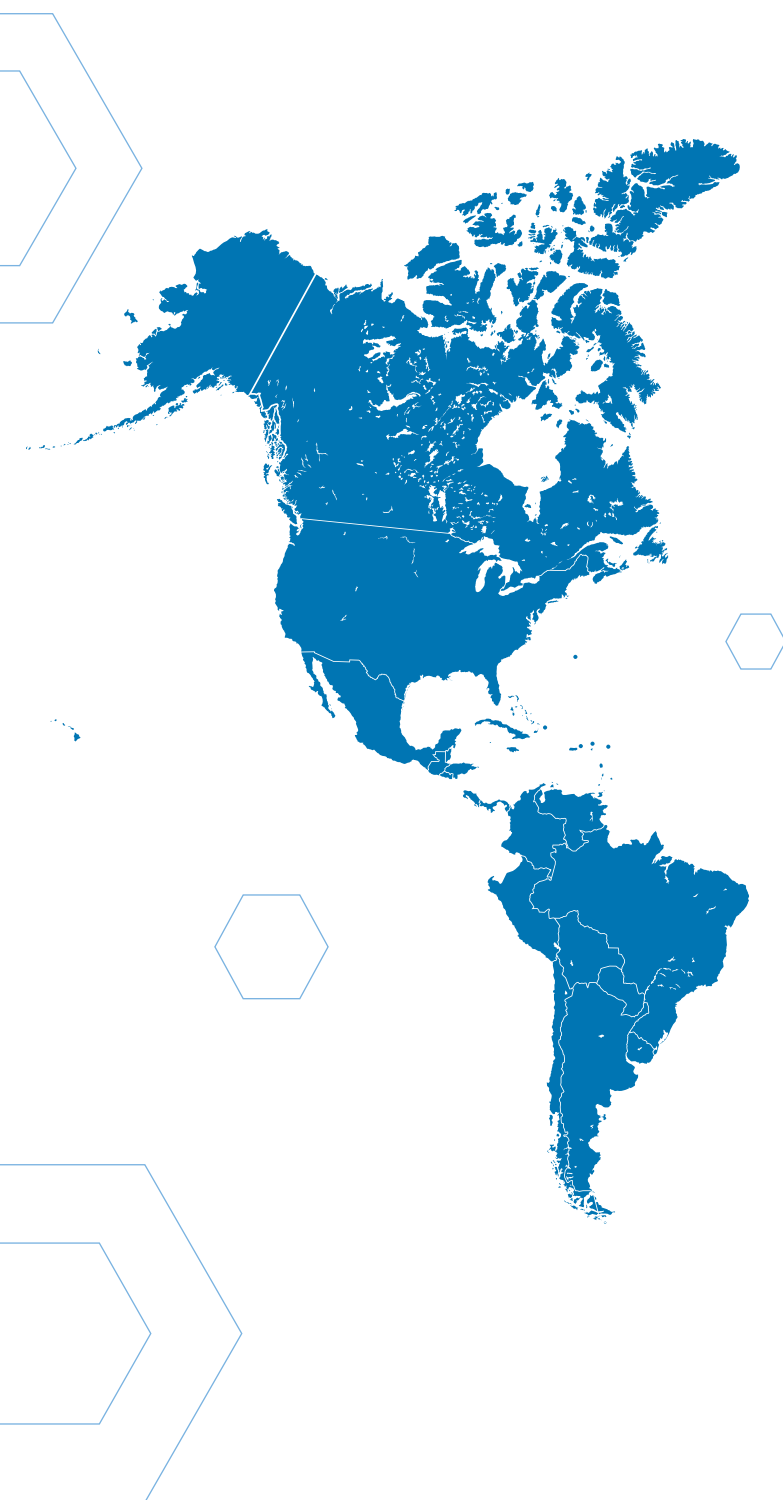
The Asia and Pacific Regional Group is chaired by Mr. Edwin Chow (JFIU, Hong Kong) and Ms. Pranee Kaoian (AMLO, Thailand).

#### HIGHLIGHTS OF THE ACTIVITIES IN THIS REGIONAL GROUP INCLUDED:

- » UPWBNM, Malaysia hosted the Strategic Analysis Course for Asia-Pacific Region organized by the Egmont Group in October 2017.
- » AUSTRAC, Australia hosted the 25<sup>th</sup> Egmont Group Plenary Meeting in September 2018.
- » AUSTRAC co-hosted the 3rd annual CTF Summit with PPAATK in Kuala Lumpur, Malaysia in November 2017. The CTF Summit is recognised globally as a leading example of multilateral cooperation focused on understanding and responding to TF.
- » AUSTRAC shared a Strategic Assessment which focused on the extent of the laundering of proceeds of foreign crime in Australia among APG members to assist in forming future assessments, enhancing knowledge and contributing to building red flag indicators.
- » Australia, Brunei, Indonesia, Malaysia, Philippines, Singapore, Thailand, and Cambodia participated in Multilateral Analyst Exchange Program – Analyst Hubbing organized by AUSTRAC on 30 July - 2 August 2018, focused on increasing levels of proactive analysis and information exchange as well as strengthening operational and regional cooperation between FIUs.
- » The Regional Financial Intelligence Analyst Course (FIAC) was organized and provided by AUSTRAC to 10 ASEAN country Financial Intelligence Units and FIU, New Zealand – as part of the FIU's commitment to providing opportunities and sharing expertise in regional and cross-border money laundering and counter-terrorism issues. This regional FIAC aims to offer specialist training in in-depth, formal and specialist financial intelligence as well as providing an increased knowledge of industry and the criminal environment. The courses will further promote cross-jurisdiction collaboration, partnerships and relationship building.
- » JFIU conducted two International Financial Investigation Courses with participants coming from the FIUs of Indonesia, Malaysia, South Korea, Thailand, Macao, Japan, and Taiwan.
- » In line with the South East Asia Counter Terrorism Financing Working Group (SEA CTFWG) project, the regional TF risk assessments focused on four major areas namely ISIL environmental scanning, hawala dealers facilitating ISIL, self-funding, and external funding to ISIL. These work streams are headed by AUSTRAC, UPWBNM, AMLC, and PPAATK respectively. The purpose of the assessments is to understand methods and modus operandi of the above areas involving terrorist groups in the South East Asia region.
- » The launch of AUSTRAC-Australia's Fintel Alliance on 3<sup>rd</sup> March 2017. This was the world's first joint public-private AML/CFT initiative that combined expertise and skills from LEAs, national security agencies, regulatory bodies, academia, and industry members to transform

the FIU's capability to analyse and exchange actionable financial intelligence with law enforcement, partner agencies, and industry.

- » Singapore established the AML/CFT Industry Partnership (ACIP), a public-private partnership (PPP) in April 2017. The mandate of the ACIP includes conducting environment scans and reviewing alternative ways to strengthen national risk understanding and mitigation of money laundering and terrorism financing risks in Singapore.
- » FIUs in the Asia Pacific Regional Group were active in sponsoring non-member FIUs in the Egmont Group membership process.
- » During this reporting period, FIUs from the Asia Pacific Regional Group signed more than 20 MoUs with Egmont Group members and four with non-Egmont Group members.





## East and Southern Africa Regional Group

The East and Southern Africa (ESA) Regional Group is made up of FIUs from jurisdictions that are members of the Eastern and Southern Africa Anti-Money Laundering Group<sup>1</sup> (ESAAMLG). During this reporting period, the group's membership grew slightly from 7 to 8 FIUs. 10 FIUs from the ESAAMLG are still non-Egmont Group members and these are the FIUs of Botswana, Eswatini<sup>2</sup>, Ethiopia, Kenya, Lesotho, Madagascar, Mozambique, Rwanda, Uganda and Zimbabwe.

During this period, ESA welcomed the new Regional Representative, Ms Fikile Zitha, FIC South Africa after a very successful 2 years under the leadership of Ms Atuweni Agbermodji, FIA Malawi.

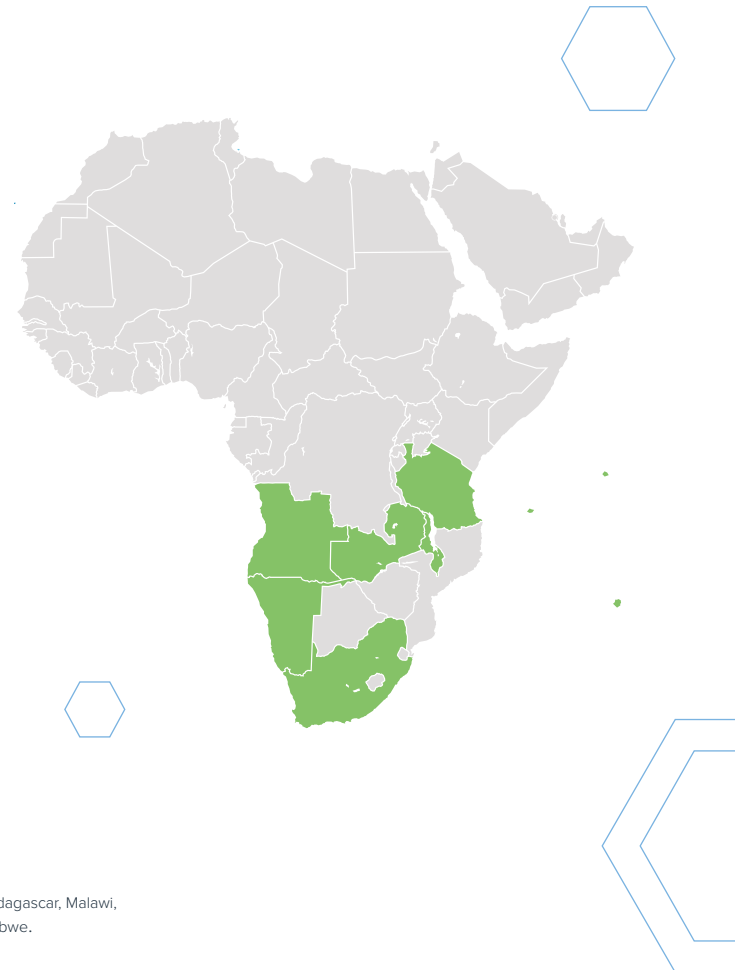
ESA together with the ESAAMLG made a strategic decision to promote the establishment and development of FIUs in the region. In this regard, there have been a number of positive developments in FIUs, which are intended to prepare candidate FIUs to advance their Egmont membership applications. This has laid a solid foundation for the sponsors of several candidate FIUs to outline the next steps in the membership process which will be pursued in the next financial year. This partnership has been possible because the current and former ESA Regional Representatives were Co-chairs of the ESAAMLG FIU Forum and recognized the importance of involving all FIUs within the ESAAMLG region. They utilized the ESAAMLG FIU Forum as an inclusive platform to discuss pertinent issues to advance ESA's strategic objective of growing Egmont membership. Through the FIU Forum, the ESAAMLG Secretariat has continued to support and facilitate the Forum meetings, which has resulted in the establishment of a number of successful projects.

### HIGHLIGHTS OF THE ACTIVITIES IN THIS REGIONAL GROUP INCLUDED:

- » During the September 2018 Plenary in Sydney, ESA welcomed FIC Zambia, its 8<sup>th</sup> member to the Egmont Group.
- » In pursuance of growing Egmont membership within the ESA region, 1 more candidate FIU was advanced, however, 2 legal issues required further clarification.
- » The region benefitted from the Strategic Analysis Course (SAC) which was offered by ECOFEL in collaboration with the ESAAMLG Secretariat and hosted by FIC Namibia, as well as an FATF Standard Training Course offered by FATF TREIN and Assessor Training.
- » To better capacitate analysts in the region, the ESAAMLG FIU Forum together with ESA has started two projects on developing **"Guidelines on How to Produce a Quality Typologies Report of FIUs"** and **"Guidance Notes on Best Mechanisms and Practices of Producing Quality Intelligence Reports"** which are expected to be completed and submitted for discussion at the April 2019 and September 2019 meetings respectively. This partnership has also realized the conclusion of its project on drafting **"Guidelines for FIU Analysts Placement Programme"**.
- » Development of a Regional Counter Financing of Terrorism (CFT) Operational Plan. The United Nations Counter-Terrorism Centre (UNCCT) of the United Nations Office of Counter-Terrorism (UNOCT), in collaboration with the Financial Intelligence Centre of

the Republic of South Africa and with the support of the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG), organized a CFT Consultation Workshop in Pretoria, South Africa from 18 – 19 July 2018.

- » In May 2018, FIU Tanzania hosted Heads of FIUs from the Greater Horn of Africa in Zanzibar. The Heads met for the purposes of experience sharing and to strengthen regional cooperation. In attendance was a representative who is coordinating the establishment of an FIU in South Sudan.
- » During this reporting period, ESA participated in the Best Egmont Case Awards (BECA) by presenting cases, as well as judging submissions.
- » ESA FIUs continue to provide resource personnel to participate in ECOFEL activities, the ECOFEL Programme Team, and the Egmont Biennial Census project team.
- » A number of ESA FIUs have been playing a crucial role in preparing their countries for mutual evaluations, whilst others participated in assessments of other jurisdictions as assessors.
- » ESA FIUs signed several MoUs with domestic agencies, Egmont and non-Egmont Group FIUs.



<sup>1</sup> ESAAMLG comprises the following jurisdictions: Angola, Botswana, Eswatini, Ethiopia, Kenya, Lesotho, Madagascar, Malawi, Mauritius, Mozambique, Namibia, Rwanda, Seychelles, South Africa, Tanzania, Uganda, Zambia and Zimbabwe.

<sup>2</sup> Formerly known as Swaziland.

## Eurasia Regional Group

The Eurasia Regional Group is made up of FIUs from jurisdictions that were members of the Eurasian Group (EAG). During the reporting period, 6 FIUs were members of the Eurasia Regional Group.

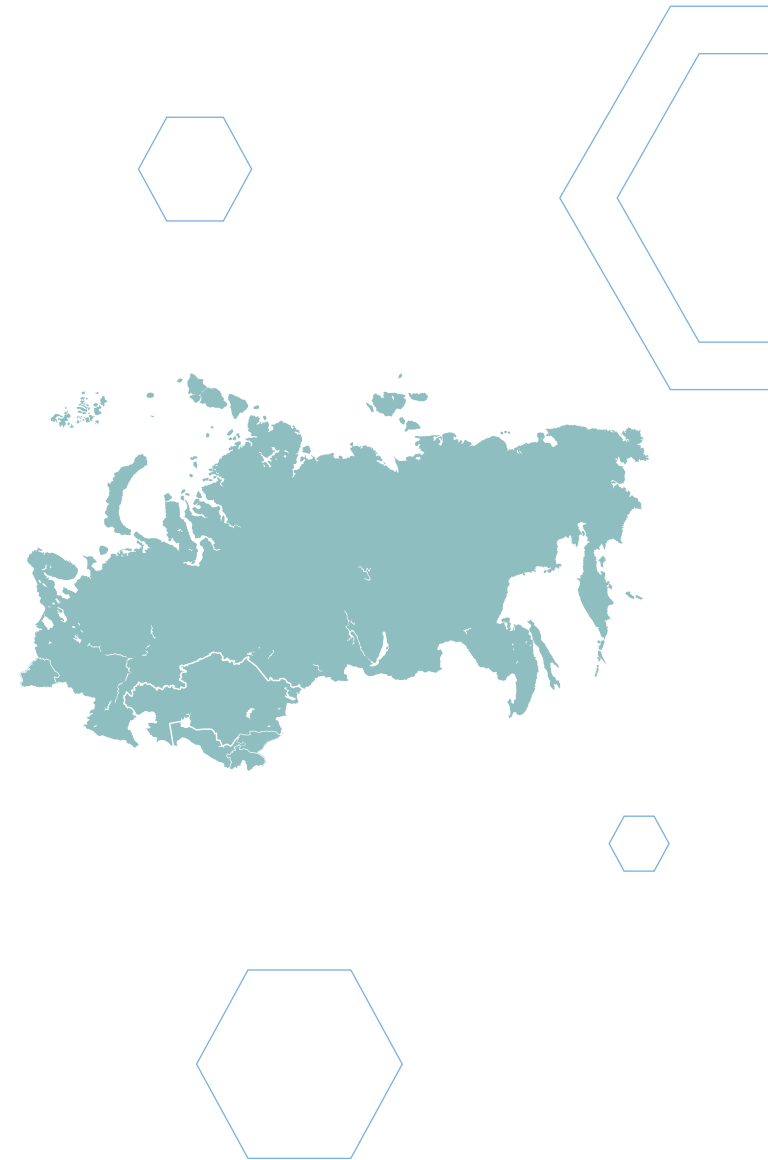
The Eurasia Regional Group is chaired by Mr. Igor Alekseev (Rosfinmonitoring, Russian Federation).

Given that Eurasia remained a transit zone for illicit drug trafficking and faced threats imposed by ISIL, affiliated terrorist groups and foreign terrorist fighters, regional FIUs devoted much of their efforts to participating in the "Barrier" (counter-terrorist) and the "Channel" (counter-drug trafficking) inter-agency cross-border operations, that are conducted annually. Furthermore, options of using mechanisms for listing and delisting the terrorists and extremists and freezing (blocking) assets of designated entities were explored. Currently, there is a "mutual freeze" mechanism in place between Russia and Kazakhstan, Russia and Kyrgyzstan, Russia and Tajikistan and Russia and Uzbekistan, while Belarus and Turkmenistan are monitoring financial transactions by using Russia's list of individuals wanted on terrorism charges.

### HIGHLIGHTS OF THE ACTIVITIES IN THIS REGIONAL GROUP INCLUDED:

- » During the joint FATF Experts Meeting in Busan, Republic of Korea (May 1 - 4, 2018), representatives from the FIUs of Kyrgyzstan, Tajikistan and Kazakhstan delivered presentations on the nexus between organised crime and terrorism financing. A project co-leader from Rosfinmonitoring facilitated discussions on the Professional ML Networks Project, where participants shared their views on risk-indicators and practical recommendations on identifying professional ML networks.
- » The region's FIUs contributed to a number of regional research projects. In particular, the report on the "Identification of Individuals Assisting Terrorist Organisations in Purchasing Tickets for Terrorist Fighters" was approved by the 28<sup>th</sup> EAG Plenary in Nanjing, China (May 2018). The Plenary also noted progress made in other research topics, including "Features of cross-border drug trafficking schemes and legalization of proceeds of drugs with the use of modern electronic payment tools", "Professional money laundering networks", and "Money laundering through insurance companies".
- » During this reporting period, a number of training events took place to facilitate preparation by EAG member states for the 2nd round of mutual assessments. The training seminar for evaluators in Tashkent, Uzbekistan (December 11 - 15, 2017) encompassed not only the theoretical aspects, but also tests on the FATF recommendations, methodology and evaluation procedures, and group assignments to assess effectiveness and technical compliance. The seminars in Dushanbe (February 11 - 15, 2018) and in Minsk (March 26 - 27 2018) were held to specifically prepare Tajikistan and Belarus for their mutual evaluations.
- » The videoconference facilities maintained by the ITMCFM (Russian FIU Training Center) were broadly used to deliver training to the personnel of Eurasia Region FIUs and their partners from law

enforcement, supervisory, investigative, prosecutorial, judicial and other domestic authorities, bringing together up to 50-65 participants. Most of the topics covered practical issues of FIUs' interaction with law enforcement agencies. For example, in the field of combating human trafficking, investigating corruption crimes, crimes committed with the use of crypto currencies, and the return of stolen assets.



## Europe I Regional Group

The Europe I Regional Group is comprised of 30 FIUs from jurisdictions that are members of the FATF and/or the Council of Europe Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL). All FIUs in the region, either of EU Member States or EEA States, are Egmont Group members.

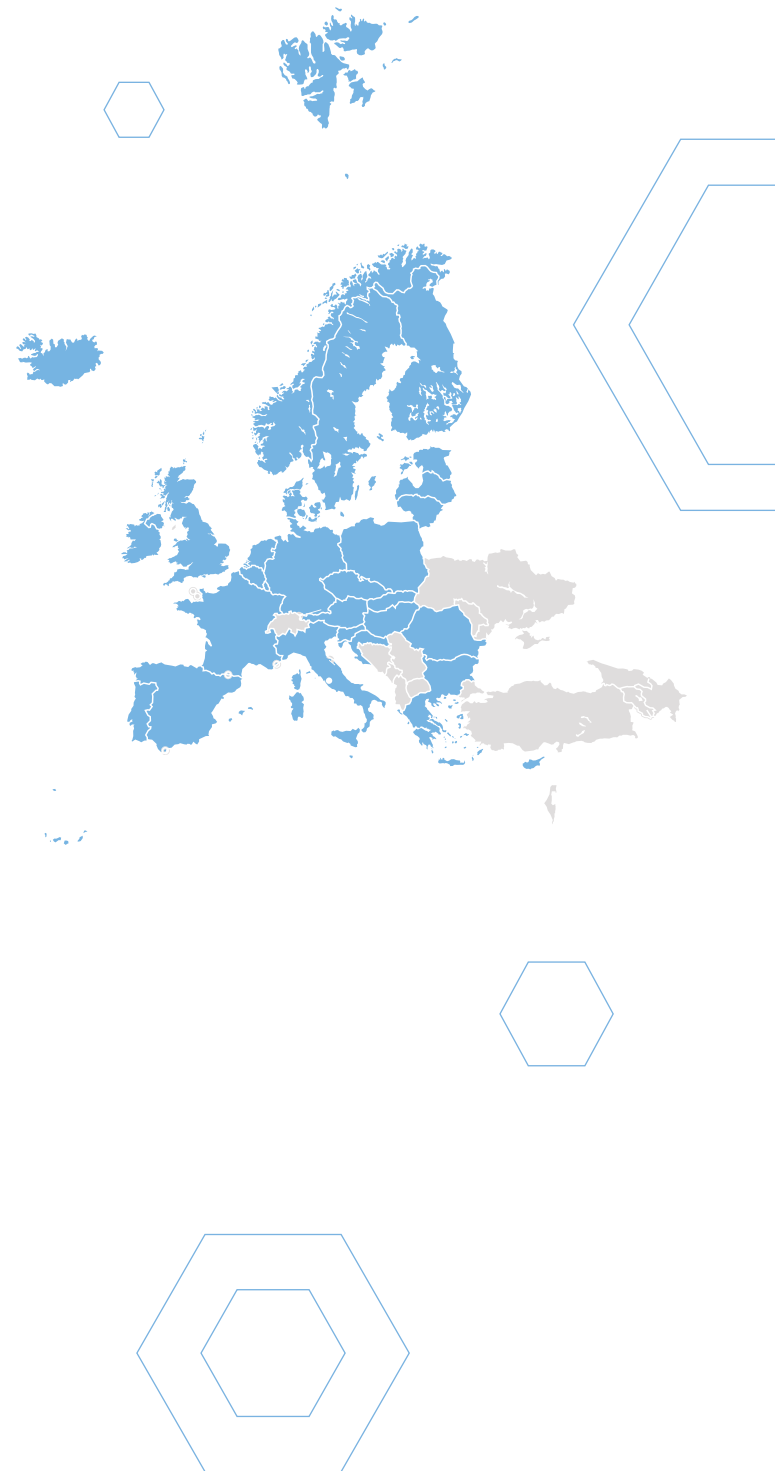
The Europe I Regional Group is chaired by Mr. Gabor Simonka (HFIU, Hungary) and Mr. Francois Magnaud (TRACFIN, France).

Mrs. Hennie Verbeek-Kusters, Head of FIU-The Netherlands (member within the Europe I region), was appointed as the Chair of the Egmont Group of FIUs on 5 July 2017 for the period 2017-2019. Europe I region FIUs were delighted with this appointment.

Regarding membership issues, FIU-Germany and its transfer from a position within the Federal Ministry of Interior to the Federal Ministry of Finance late June 2017 led to a new application for membership to the Egmont Group. The efforts of FIU-Germany were commended highly, and its membership was endorsed by the Heads of FIU in July 2017.

### HIGHLIGHTS OF THE ACTIVITIES IN THIS REGIONAL GROUP INCLUDED:

- » Regional group meetings were held frequently, both in the margins of Egmont Group Meetings or Plenaries and as part of the regular European gathering held in Brussels. These meetings included, but were not limited to:
  - A regional group meeting held in Macau in July 2017, where new regional representatives were designated. FIUs also discussed a series of reports aimed at tackling emerging TF risks and enhancing the role of FIUs, adopted under the Italian Presidency of the G7 in pursuance of the Action Plan on Combatting the Financing of Terrorism.
  - A regional group meeting took place in Buenos Aires, Argentina, in March 2018. Based on the thematic approach with regard to the Plenary meeting – the fight against the laundering of the proceeds of corruption – regional members exchanged views on a variety of related matters, including the obstacles in exchanging information related to corruption, corruption cases connected with public procurement and ways of improvements for the reporting by accountants on corruption-related money-laundering cases. The Egmont Group Strategic Plan 2018 – 2021 was also subject to discussions.
  - A series of meetings in Brussels in September 2017, December 2017 and June 2018, where there were discussions on the latest developments pertaining to the common European legal framework.
- » As a recurrent item in regional discussions, impediments to information exchange provide the bulk of discussions within the Europe I Regional Group. Committed to overcome such obstacles, the regional members formulated concrete proposals to enhance their cooperation and alleviate these problems considerably.



## Europe II Regional Group

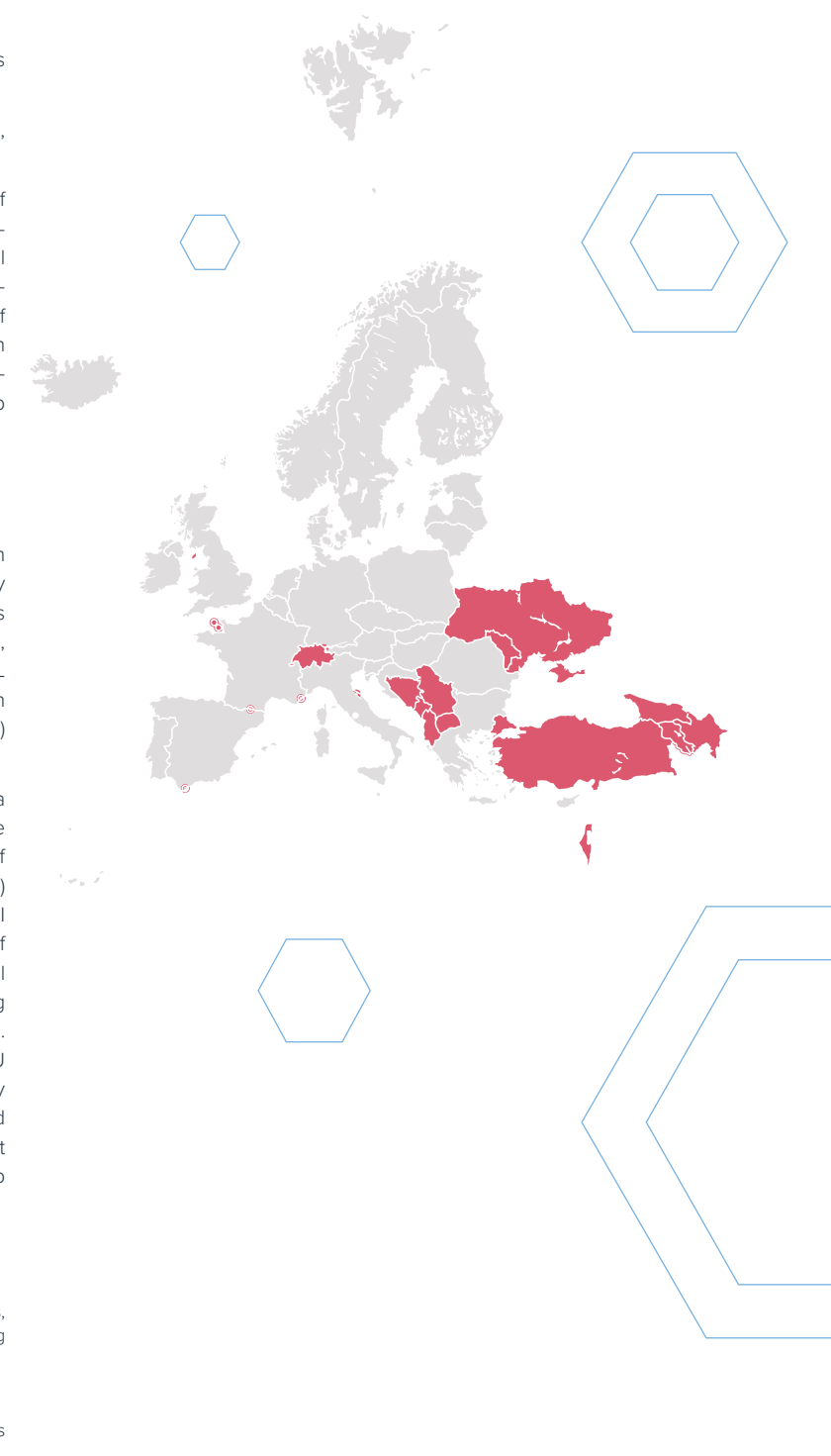
The Europe II Regional Group is comprised of 23 FIUs from jurisdictions that are members of MONEYVAL and the FATF.

The Europe II Regional Group is chaired by Mr. Daniel Thelesklaf (EFFI, Liechtenstein) and Ms. Lindsey Bermingham (FIU-IOM, Isle of Man).

There were no Egmont Group candidate FIUs in the region as the FIUs of all current MONEYVAL member states are already Egmont Group members. Nevertheless, based on significant changes to the organisational structure, mandate and operational status which occurred in FIU Azerbaijan, since October 2017 this FIU was no longer considered a member of the Egmont Group. Subsequently, the new FIU Azerbaijan submitted an application for membership to the Egmont Group and based on its significant efforts, it was accepted as a member during the 25<sup>th</sup> Egmont Group Plenary meeting in Sydney, Australia in September 2018.

### HIGHLIGHTS OF THE ACTIVITIES IN THIS REGIONAL GROUP INCLUDED:

- » A Regional Group Meeting was held in Strasbourg, France in December 2017 within the margins of the MONEYVAL Plenary meeting. Among other topics, the Regional Group provided proposals regarding the new Egmont Group Strategic Plan 2018 – 2021, received a presentation regarding the main features of the goAML software, and discussed the results of a horizontal review of the 4th (FATF) and 5th (Moneyval) round of Mutual Evaluation Reports (MER) and their implications for the Europe I and Europe II regions.
- » A Regional Group Meeting was held in Buenos Aires, Argentina in March 2018, focusing on topics related to the fight against the laundering of the proceeds of corruption, continuation of the topic of the common recommendations for FIUs arising from the 4th (FATF) and 5th (MONEYVAL) round of MERs for the Europe I and Europe II regions, and the Egmont Group Strategic Plan 2018 – 2021. One of the decisions made during this meeting was the formation of a small sub-group aimed at the development of a framework for conducting strategic analyses regarding laundering the proceeds of corruption. Members of this sub-group are FIU Isle of Man, FIU Liechtenstein, FIU Serbia, FIU Holy See, FIU Ukraine, and FIU Guernsey. The majority of the sub-group FIUs met in Strasbourg (July 2018) and discussed the scope and next steps regarding this work. It was agreed that these FIUs will look at a high-level analysis to enable the sub-group to come up with a framework for conducting strategic analyses.
- » A Regional Group Meeting was held in Sydney, Australia in September 2018, focusing on the following topics:
  - Follow-up on the decisions made by the Regional Group in Buenos Aires, including regarding the development of a framework for conducting strategic analyses regarding laundering the proceeds of corruption.
  - Analysis of the Egmont Biennial Census 2017.
  - Implications of the 5th Anti-Money Laundering Directive of the EU on FIUs from the Region.
  - A discussion regarding the role of FIUs in public-private partnerships.
  - A discussion regarding the ECOFEL "Understanding FIU Autonomy and Operational Independence" Paper.
  - An update on ECOFEL activities.
  - Regional contributions to BECA.
  - The development of a regional community on the ESW.





## Middle East and Northern Africa Regional Group

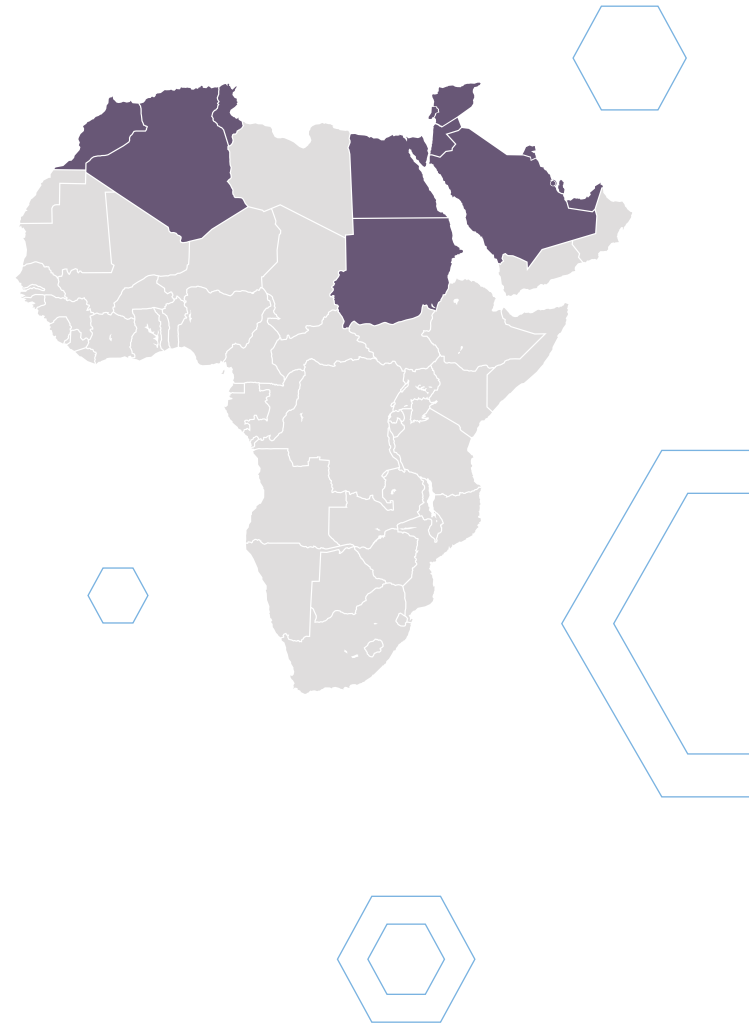
The Middle East and Northern Africa Regional Group is made up of 13 FIUs from jurisdictions that are also members of the Middle East and Northern Africa Financial Action Task Force (MENAFATF).

The Middle East and Northern Africa Regional Group is chaired by Mr. Abdul Hafiz Mansour (SIC, Lebanon).

Regarding membership issues, 8 candidate FIUs from the region are currently in the EG membership process, and Sponsor FIUs have been supporting candidates through undertaking legal reviews and providing to some FIUs training and technical assistance on topics such as tactical analysis, strategic analysis, the importance of FIU Operational Independence, and Egmont Group membership requirements.

### HIGHLIGHTS OF THE ACTIVITIES IN THIS REGIONAL GROUP INCLUDED:

- » One Regional Group meeting held in Manama, Bahrain in December 2017 on the margins of the MENAFATF Plenary meeting. Topics discussed related to the new Egmont Group Strategic Plan 2018 – 2021, progress on membership of candidate FIUs, and other AML/CFT regional developments, including the results of the Mutual Evaluation Reports.
- » Regional Group meetings were held in the margins of Egmont meetings:
  - One regional meeting held in Buenos Aires, Argentina in March 2018 focusing on topics related to ECOFEL, fighting corruption, how to enhance cooperation between FIUs and domestic Anti-Corruption Agencies (ACAs), and discussions on how to optimize the use of the MENA Community in the ESW.
  - One regional meeting held in Sydney, Australia in September 2018 focusing on topics related to the Egmont Biennial Census (EBC) 2017 results, the upcoming EBC, Public-Private Partnerships and the related MENA experience, ECOFEL's paper on FIU autonomy and independence and regional contributions to the Best Egmont Case Awards (BECA).
- » Updates on EG Working Group Activities and Projects, with a focus on regional contributions and topics related to the MENA region; including fighting corruption and terrorism financing.
- » Updates on the status of candidate FIUs from the Middle East and Northern Africa Region. To note that FIUs in the region were active in sponsoring non-member FIUs in the Egmont Group membership process, with several candidate FIUs advancing in their applications.
- » FIU-related challenges both in technical compliance and effectiveness in light of the new round of Mutual Evaluation Reports. To note that several staff members of regional FIUs, such as Jordan FIU, SIC Lebanon, Egypt FIU and others, participated as assessors in Mutual Evaluation Assessments.
- » The translation of Egmont Group core documents and operational papers into Arabic.
- » Discussion on the region's priorities and objectives, in light of the newly endorsed Egmont Group Strategic Plan 2018 - 2021, with the development of a draft regional action plan outlining regional initiatives and goals, divided by priority.



## West and Central Africa Regional Group

The West and Central Africa Regional Group is made up of jurisdictions that were part of the Inter-Governmental Action Group Against Money Laundering in West Africa (GIABA) or the Task Force on Money Laundering in Central Africa (GABAC). During the reporting period, 14 FIUs were members of the West and Central Africa Regional Group.

The West and Central Africa Regional Group is chaired by Mr. Hubert Samone (NAFI, Cameroon).

Sponsor FIUs within the region supported Egmont Group candidate FIUs (the FIUs of Congo, Benin, and Ethiopia) through the delivery of legal reviews and onsite visits.

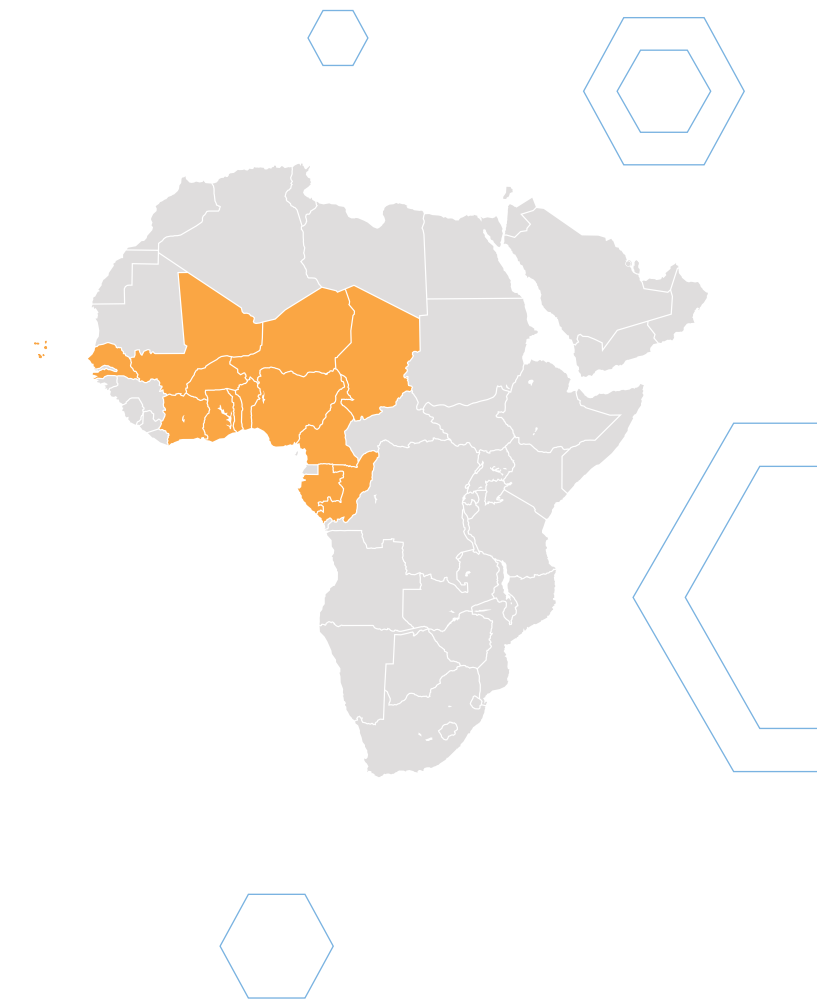
During this reporting period, the FIUs of Congo and Benin were admitted to the Egmont Group in Buenos Aires, Argentina at the 24<sup>th</sup> Egmont Group Plenary. In September 2018 at the 25<sup>th</sup> Egmont Group Plenary in Sydney, Australia, the region saw the readmission of the Nigerian FIU into the Egmont Group.

### HIGHLIGHTS OF THE ACTIVITIES IN THIS REGIONAL GROUP INCLUDED:

#### Training and related activities

FIUs in the region actively participated in several training programs and activities, with a number of FIUs organising workshops and fulfilling roles as auditors or experts.

- » **17-19 July 2017, Cotonou, Benin.** Regional training workshop on money laundering and terrorism financing through international trade organised by GIABA. Two representatives from CENTIF Senegal participated as an expert and an auditor.
- » **10-24 August 2017, Kunming, China.** Training seminar on the fight against money laundering and terrorism financing.
- » **16-18 August 2017, Dakar, Senegal.** Workshop on terrorism financing. Part of the United Nations Office on Drugs and Crime's (UNODC) Global Program Against Money Laundering and Terrorist Financing (GPML).
- » **18-20 September 2017, Saly, Senegal.** Regional seminar on Typologies on Extractive Industries. Organised by GIABA.
- » **6-19 October 2017, Grand Bassam, Côte d'Ivoire.** Regional workshop on the Effective Implementation of AML/CFT Requirements and the Role of Stakeholders. Organised by GIABA.
- » **31 October - 3 November 2017, Niamey, Niger.** Training workshop for analysts and investigators. Organised by the CENTIF Network of the West African Economic and Monetary Union (RECEN-UEMOA).
- » **9-10 December 2017, Douala, Cameroon.** Workshop on the collaboration between BEAC (Central Bank) and ANIFs regarding the implementation of the CEMAC regulation on anti-money laundering, financing of terrorism, and proliferation in Central Africa. Organised by Conférence des ANIF de la CEMAC (CAC) and the ANIFs Association.
- » **15-19 January, Saly, Senegal.** GIABA and Egmont Group Regional Training Workshop on Strategic Analysis for the benefit of FIUs.



- » **22-25 January 2018, Rabat, Morocco.** Joint GIABA/MENAFATF/ESAAMLG Workshop for exchange and sharing on typologies studies on money laundering and the financing of terrorism through smuggling, real estate, and human trafficking.
- » **29 January 2018, Paris, France.** The CLAB (Anti-Money Laundering Liaison Committee of Franc Zone). Participation of the West and Central Africa Region Egmont Group Regional Representative, alongside other representatives from the region's FIUs.
- » **4-6 April 2018, Rabat, Morocco.** Seminar on control practices in AML/CFT. Organised by the Bank Al Maghreb and the International Institute of Banking and Finance of the "Banque de France".
- » **9-10 April 2018, Algiers, Algeria.** Meeting on the fight against terrorism in Africa. Jointly organized by the Ministry of Foreign Affairs Algeria and the African Union Commission.
- » **26 April 2018, Paris, France.** International Conference on Combatting Terrorist Financing 'No Money for Terror'.
- » **7-11 May 2018, Someone, Senegal.** Working Group meetings and the 29<sup>th</sup> GIABA Technical Commission Plenary.
- » **14-18 May 2018, Senegal.** Regional training workshop on National Risk Assessment. Organised by GIABA.
- » **31 May 2018.** Training workshop for financial institutions on the effective implementation of AML/CFT provisions. Jointly organized by CENTIF Benin and the Inter-ministerial Committee on AML/CFT Togo.
- » **18-19 July 2018, Accra, Ghana.** GIABA held a National Sensitization Seminar for High-Level Religious Leaders and Institutions on Anti-Money Laundering and Counter-Financing of Terrorism.
- » **16 August 2018, Togo.** Training workshop for religious leaders on the risks associated with the abusive use of NPOs for terrorist activities.
- » **18-19 September 2018, Luxembourg.** Meeting of Francophone FIUs.
- » The 21<sup>st</sup> Global Programme by Interpol on Combatting Corruption, Financial Crime, and Asset Recovery.
- » FATF Plenaries in February and June 2018.
- » Validation Workshop of AML/CFT training materials for law enforcement and judicial authorities organized by GIABA.
- » The 11<sup>th</sup> Ordinary General Assembly of the Network of CENTIFs of the West African Economic and Monetary Union (WAEMU).
- » A study on money laundering and terrorist financing arising from the smuggling of goods in West Africa. Organised by GIABA.

#### FIU Initiatives

- » CENTIF Senegal completed, in August 2017, a National Risk Assessment (NRA) of money laundering and terrorism financing through the production of an ad hoc report. The NRA was the prelude to the visit of experts appointed by GIABA in the framework of the mutual evaluation of the Senegalese AML/CFT system.
- » In the spirit of collaboration, CENTIF Senegal received two members of the CENTIF Benin managerial team, as well as a delegation from CENTIF Mali for the purposes of sharing experiences in national risk assessments.

- » FIC Ghana organised a technical meeting with regulators within the Banking, Securities and Exchange and Insurance Sector in Ghana on the revision of AML/CFT Guidelines to include FATF Recommendations and relevant findings from the National Risk Assessment.
- » CENTIF Togo held a meeting with public administrators in charge of regulation, supervision, and control, with the view of establishing formal working relations and information exchange channels in regard to AMI/CFT.

#### MoU

- » A Memorandum of Understanding was signed between Ghana and the Republic of Indonesia on March 14, 2018.

## Awards

The Best Egmont Case Award (BECA) is an initiative of the Technical Assistance and Training Working Group that encourages Egmont Group member FIUs to share cases where exchange of financial intelligence has led to successful ML/TF investigations.

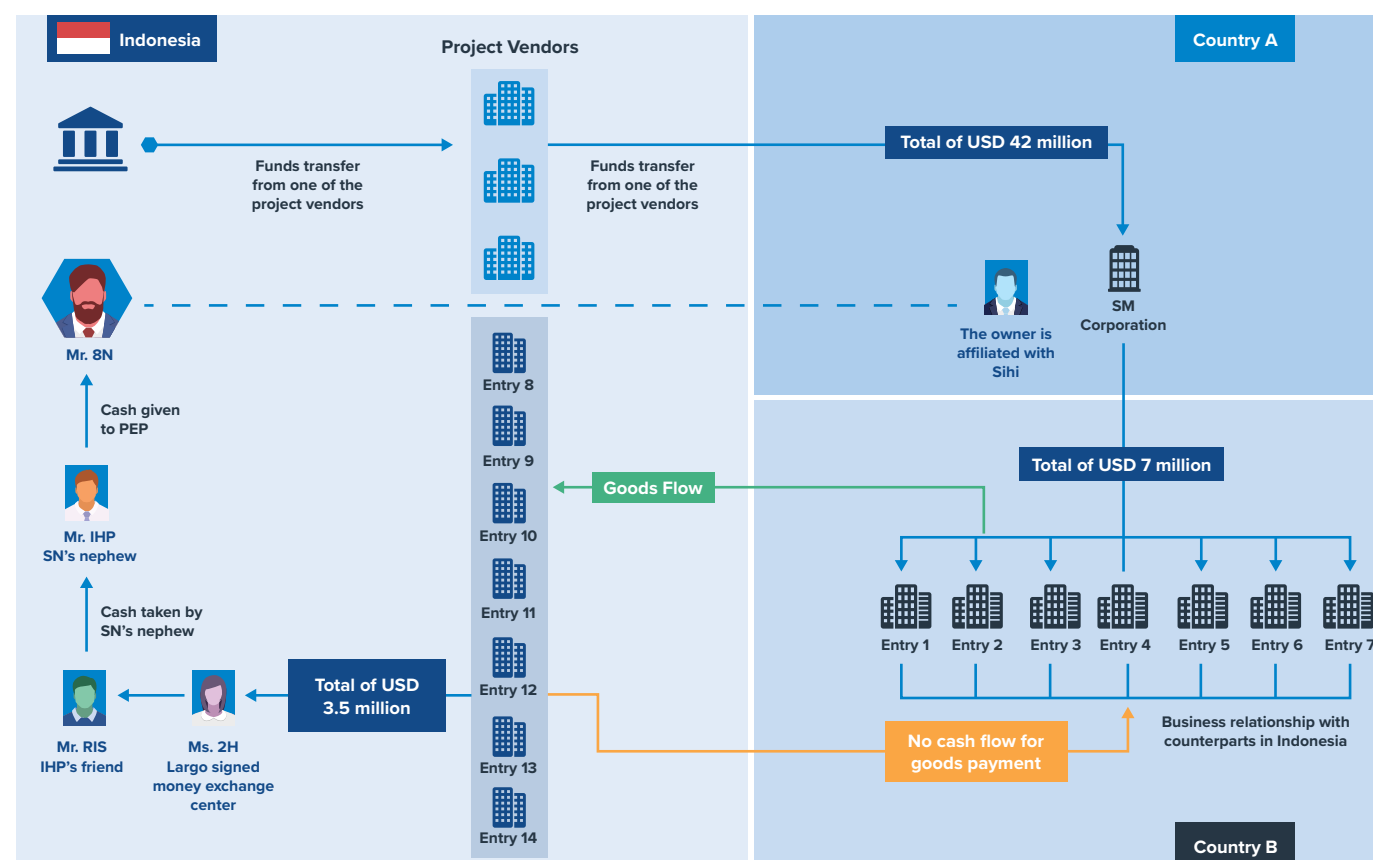
Every year two finalists are selected with the winner being selected by a panel of judges at the annual Egmont Group Plenary.

## 2018 BECA COMPETITION FINALIST

### CASE FROM INTRAC, INDONESIA. THE KEY TO UNCOVERING THE 'GLOBAL-U-TURN' SCHEME

This grand-corruption case is related to a procurement of Electronic ID (e-ID) project in a ministry in Indonesia from the period of 2011 to 2013, which allegedly resulted in significant state losses of IDR 2.3 trillion (eq. USD159.7 million). The case was initiated by law enforcement agency (LEA) (i.e. Corruption Eradication Commission—KPK) in 2014 and is still continuing in order to reveal the whole scheme of corruption and money laundering. In addition, the case allegedly involves many names of high-ranking state officials, including more than 20 members of the Legislative Body with SN (Spokesman of the House of the Representatives) as the prime perpetrator, several high officials of two project-related Ministries, and numerous parties from private sectors.

The aforementioned case demonstrates a modus operandi of GLOBAL U-TURN to disguise the origin of money and to avoid detection from the authorities. Furthermore, it also depicts the significant role of the FIU and Egmont information exchange platform in assisting law enforcement agencies in investigating transnational crime.



Based on the flowchart above, it is depicted that the money was moved overseas through two countries (Country A and Country B), subsequently turned back to Indonesia (U-turn pattern), and eventually was used as a bribe to the PEP (Politically Exposed Person). In principle the existing funds abroad remain abroad, and the funds within the country remain in the country (no official remittance was ever recorded). However, the overseas parties succeeded in sending the funds, and the parties in Indonesia successfully received the requested funds.

INTRAC in collaboration with investigators managed to uncover the scheme of this case. To date, seven people from both the public and private sectors have been convicted with imprisonment, with sentences ranging from 6 to 15 years. In addition, under the verdict on 24 April 2018, the state has successfully confiscated the proceeds of crime from SN totalling USD 7.3 million, which was made up of USD 3.5 million derived from the above scheme, and USD 3.8 million through several third parties. As for SN himself, he was sentenced to 15 years of imprisonment and must pay a fine of IDR 500 million.

In conclusion, the disclosure of this case was made possible due to information provided by Egmont member FIUs. INTRAC might not have a formal agreement with foreign FIUs in both countries for requesting information. However, under the Egmont information exchange platform, INTRAC was able to obtain foreign information which significantly led to the successful analysis and investigation of this case.

Furthermore, the joint-analysis scheme between INTRAC and the LEA enabled each team to share information effectively and establish two-way feedback. In this way, INTRAC and LEA are able to share mutual understanding of the needs and limitations of their respective authorities, so that case completion can be accelerated all the time.

## 2018 BECA COMPETITION WINNER

### CASE FROM SFMS, UKRAINE. THE SFMS HAS CONDUCTED A MULTISTAGE AND UNPRECEDENTED, BY ITS COMPLEXITY, INVESTIGATION OF CORRUPTION AND MONEY LAUNDERING BY FORMER HIGH-RANKING OFFICIALS OF UKRAINE.

At the beginning of the mentioned case, the SFMS conducted several separate and unrelated investigations based on SARs involving both national and foreign companies. The analysis of the mentioned reports revealed that part of the suspicious companies were related to former Ukrainian high-ranking officials.

At the same time, the Prosecutor General's Office of Ukraine initiated a criminal proceeding based on numerous facts of acquisition by the founders and heads of a large number of legal entities, who with the assistance of top officials of the country abused the office of state property through the legalization (laundering) of a large amount of proceeds from crime.

The SFMS established that assets obtained as a result of committed crimes, had been legalized, both in Ukraine and abroad. Therefore, an extremely important task was to conduct a successful financial investigation, to find out all the details of the case, identify the suspects and establish the amount of legalized assets for their further arrest and confiscation (recovery). During the financial investigation, the SFMS analyzed more than 600 statements of bank accounts (among which more than 300 bank accounts had been opened abroad) and information received from 12 foreign FIUs (under the auspices of the World Bank StAR Initiative).

Following the results of the analysis, it was revealed that the global money legalization scheme involved more than 1000 business entities.

As a result of analysis of STRs received from the financial sector, coupled with statements on accounts, identification information and data from law enforcement and other state authorities, a list of foreign companies controlled by different Ukrainian citizens was compiled. They all had one thing in common – they each worked in Ukraine together with one former high-ranking official.

Financial transactions conducted with the participation of a number of the identified companies was the final stage of the scheme. It consisted of investing a significant amount of funds (about USD 1.4 billion) in Ukraine through the purchase of debt, depositing funds, and also the purchase of shares in Ukrainian enterprises.

At the beginning of the investigation Ukrainian companies were detected which transferred funds in favour of non-resident companies that "invested" in Ukraine.

More than 20 Ukrainian companies were also related to another former official through the citizens of Ukraine, many of whom also acted as controllers of non-resident companies which "invested" in Ukraine.

Analysis of constituent-official links and registration addresses of a part of Ukrainian enterprises confirmed that incorporation and adjustment of these companies' activities were made by the same persons (both individual and legal) that related to the PEP. As well as joint registration addresses, and management of the flow of funds on accounts from the same IP addresses revealed the link between these companies.

In 2014, the SFMS decided to suspend debit transactions on Ukrainian accounts of non-resident companies. As a result, on the accounts of non-resident companies in bank institutions of Ukraine more than USD 1.4 billion were frozen.

Alongside this, during parallel investigations, separate chains of the asset's movements were detected, which were controlled by ex-high-ranking officials.

In particular, it was found that the primary source from which the first chain of funds was withdrawn from Ukraine began as funds received by Ukrainian companies as a result of the operation and implementation of criminal schemes associated with former officials and citizens of Ukraine, namely:

1. Embezzlement of funds of state companies;
2. Embezzlement of National Bank of Ukraine's refinancing;
3. Sale of contraband imported petroleum products at market prices;
4. Selling of gas at market prices, which should have to be sold at a cut reduced price;
5. Getting "rollbacks";
6. Activity of professional launderers - conversion centers, etc.

Thanks to the active interagency and international cooperation of the FIU of Ukraine it has been established that the process of withdrawal of funds from Ukraine and their "investing" in Ukraine were coordinated from a single management center with the assistance of a large number



>600 Bank statements analyzed



Close cooperation with 12 FIUs



Interagency cooperation



Number of meetings were supported by StAR



Bilateral and multilateral approach was used

of shell companies. The signs of a functioning international professional “platform” for money laundering with billions of turnover that provided services to other entities was also revealed.

Part of these companies have been eliminated, some of them have improper legal status and were registered by suspicious legal persons.

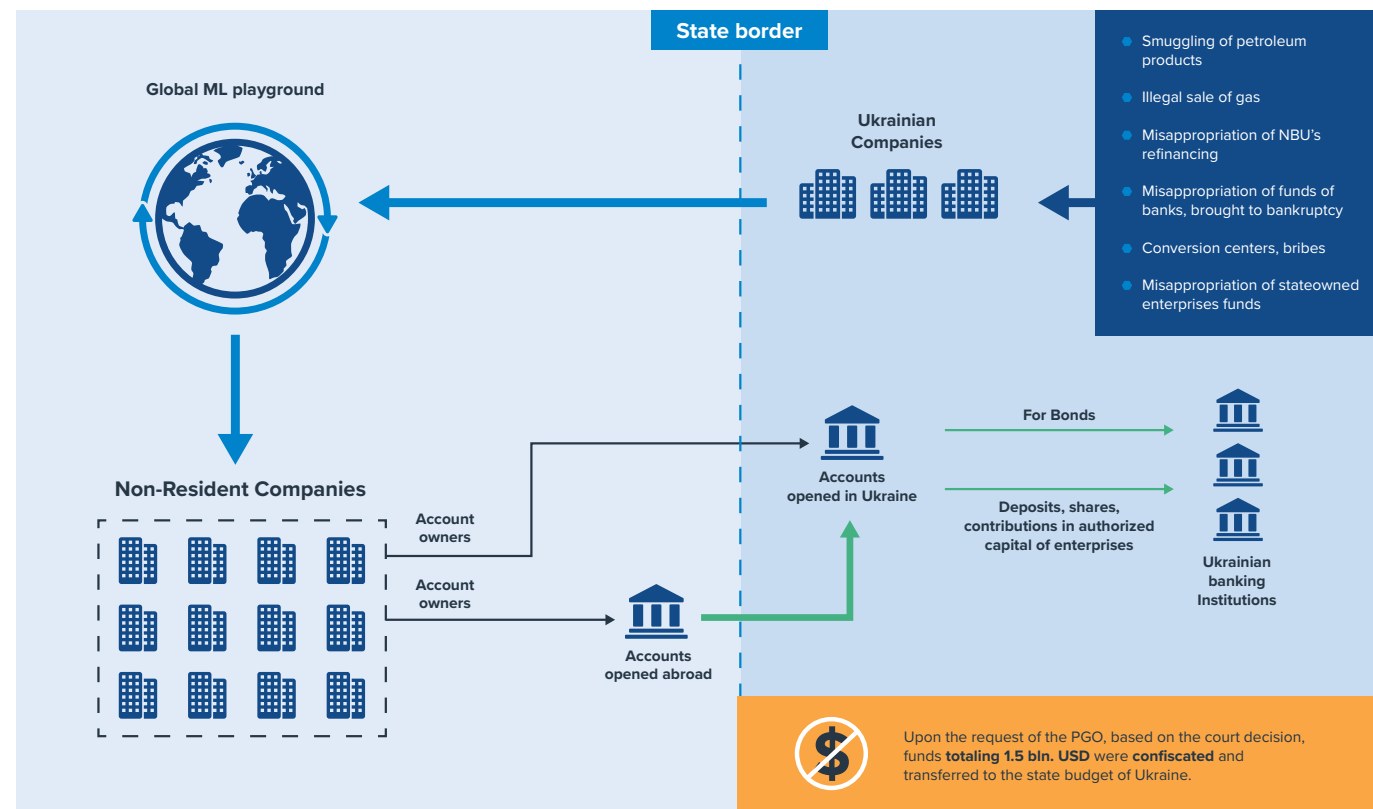
Thus, the disclosed scheme of money laundering can be outlined in the following way:

- » Billions of funds related to corruption were withdrawn abroad from Ukraine through a number of Ukrainian and foreign companies controlled by high-ranking officials;
- » In turn, these foreign companies provided the transfer of received funds to the accounts of a significant number of chains of foreign companies - participants of the “international professional platform”. At this stage there was a mixing of different flows of funds in order to conceal information both in relation to sources and further movement;
- » Part of the funds were transferred through accounts of a significant

number of foreign companies controlled by persons associated with one of the former high officials;

- » The links between companies and individuals involved in the scheme with a number of high-ranking officials indicate the functioning of an organized criminal group of high-ranking officials with a clear division of responsibilities. The purpose of this scheme was the receipt of criminal proceeds and their subsequent legalization;
- » At the final stage, part of the funds was sent to Ukraine under the guise of “investments” to complete their legalization.

Within the framework of the criminal proceedings, according to the submission of the Prosecutor General’s Office of Ukraine, funds to the equivalent amount of USD 1.5 billion were confiscated and transferred to the state budget of Ukraine in 2017.



# Acknowledgements

## HOST FIUS

### Meetings

2017



**UIF**  
**ARGENTINA,**  
OCTOBER 2017 (Buenos Aires)  
Information and Exchange Working Group (IEWG) Intersessional Meeting

2018



**UIF**  
**ARGENTINA,**  
MARCH 2018 (Buenos Aires)  
Egmont Group HoFIU and Working Groups Meeting



**FIU,**  
**LIECHTENSTEIN,**  
AUGUST 2018 (Vaduz)  
Egmont Committee (EC) Intersessional Meeting



**AUSTRAC,**  
**AUSTRALIA,**  
SEPTEMBER 2018 (Sydney)  
25<sup>th</sup> Egmont Group Plenary

### Training Courses and Workshops

**FIU,** Saudi Arabia

**FIU,** Malaysia (UPWBNM)

**FIC,** Namibia

**AUSTRAC,** Australia

**Rosfinmonitoring,** Russian Federation

**TRACFIN,** France

### DONORS AND CONTRIBUTIONS

**FinCEN, USA:**  
Hosting, maintaining and improving the ESW

**FINTRAC-CANAFE, Canada:**  
Contribution as the host jurisdiction for the EGS since 2007 and constant support since then

**AML, Taiwan:**  
Seconding a Senior Officer to the EGS from September 2015 – September 2019

**Rosfinmonitoring, Russian Federation:**  
Seconding a Senior Officer from December 2017 to December 2021

**UK aid from the UK Government for the funding of ECOFEL**

**SAFIU, Saudi Arabia:**  
Annual donation for a period of 10 years



## Communiqué Egmont Group commits to combat corruption

15 March 2018 – Buenos Aires – The Egmont Group of Financial Intelligence Units (FIUs) met this week in Argentina to discuss the unique role of FIUs within the broader anti-money laundering / counter financing of terrorism (AML/CFT) system in addressing the money laundering of the proceeds of corruption, including the importance of the autonomy of financial intelligence units in the fight against corruption.

To avoid any undue political, governmental or industry influence or interference, the Egmont Group Heads of FIU agreed that FIU Autonomy and Operational Independence are critical to the effective contribution of FIUs to the fight against corruption.

FIUs receive and exchange highly confidential financial information and are strategically placed to detect corruption and trace its proceeds. For these reasons FIUs should be safeguarded from any undue interference or influence when conducting their functions.

As claims of corruption in the public and private sectors have become more widespread across the world in recent years, FIUs from 155 countries and jurisdictions, representatives of Egmont Group Observers, and International Partners attended this meeting to find ways to address this important issue.

### The Heads of FIUs adopted the following initiatives:

- » Develop guidance on characteristics of an operationally autonomous and independent FIU.
- » Communicate the principles promoted in this guidance with governmental agencies, private sector, and the public in general.
- » Work with FIUs and other stakeholders through the new Egmont Centre of FIUs' Excellence and Leadership (ECOFEL) to increase capacity building efforts focused on FIU autonomy and independence.
- » Improve the practices and tools employed by FIUs to determine whether a case involves Political Exposed Persons (PEPs) and other high-risk categories related to corruption.
- » Make use of the information exchange tools available for its members to better facilitate analysis in corruption cases and foster the trust between FIUs and other domestic and international partners.
- » Strengthen FIUs' capacity to provide effective international cooperation in detecting, tracing, and identifying the laundered proceeds of corruption, for the purpose of enabling timely provisional measures.
- » Issue an updated list of indicators for identifying suspicious transactions and activities indicative of corruption.

Financial intelligence units are uniquely positioned to cooperate and support both national and international efforts to counter corruption. In this regard, the Egmont Group also supports the efforts of its international partners and other stakeholders to give effect to the resolutions and statements issued by the Global Agenda 2030 and its 17 "Sustainable Development Goals" (SDGs) adopted by world leaders during the United Nations General Assembly meetings in 2015, United Nations Security Council, the G20 Finance Ministers, and the Financial Action Task Force (FATF) / FATF Style Regional Bodies (FSRBs).

Buenos Aires,

15 March 2018

## Co-chairs' statement 25<sup>th</sup> plenary of the Egmont Group of financial intelligence units



The 25<sup>th</sup> Egmont Group Plenary took place between 24-27 September 2018 in Sydney, Australia. Ms. Henrie Verbeek-Kusters, Egmont Group Chair/ Head of FIU-Netherlands and Ms. Nicole Rose PSM, AUSTRAC CEO, chaired the meeting. 419 delegates (including 23 observers and international partners) gathered to advance

work on FIU operational independence and autonomy and to identify the role public-private partnerships (PPPs) can play in the fight against money laundering and the financing of terror.

### OPERATIONAL INDEPENDENCE AND AUTONOMY

The Egmont Group is convinced that operational independence and autonomy is an essential criterion of FIU effectiveness, amongst other factors, in the fight against corruption. In fact, it has been one of the most pressing issues for members that have faced compliance matters.

In response to a growing need for support, the Egmont Centre of FIU Excellence and Leadership (ECOFEL) has produced a paper on FIU Operational Independence and Autonomy. The Heads of FIU endorsed the paper, which defines the characteristics of operational independence and autonomy and identifies the challenges FIUs may face. The paper can also be used as a resource to help increase understanding of the topic. It will be published in the coming weeks to ensure its broad use.

Introduction of the paper was supported by an ECOFEL executive training session, based on the experiences of four Egmont Group members. Heads of FIU questioned and discussed the case studies in a live and interactive session.

### PUBLIC-PRIVATE PARTNERSHIPS (PPPs)

The plenary recognized the importance of private and public sector cooperation to harness collective capabilities in our joint fight against financial crime.

Addressing the topic from the perspective of FIUs, the plenary discussed the many contexts, opportunities, and challenges FIUs face when participating in PPPs. The plenary agreed that PPPs can, in a number of jurisdictions, enhance the quality of reporting, improve the expertise and knowledge of all partners as well as provide more flexibility and agility to respond to the fast-changing ML/TF threat environment. The plenary also acknowledged the legislative, technological, and cost barriers that can exist in the formation of public-private partnerships.

Ultimately, despite their form, structure or objective, the plenary concluded that PPPs should:

- » be set up in co-creation, starting strategically with a focus on priority issues;
- » be based on mutual trust and oriented to meet the needs of the FIUs;
- » be goal-oriented, create mutual benefits and add value to all partners;
- » consider the size and characteristics of the jurisdiction, and its risk and context ("one size does not fit all");
- » complement the existing STR/SAR reporting regime.

### CORRUPTION INDICATORS

The Heads of FIU approved a set of indicators for corruption related cases, from the perspective of FIUs. The indicators can be used as a tool to help identify transactions and clients related to the money laundering of the proceeds of corruption. The Egmont Group agreed to continue to update the list of indicators through engagement with the private sector.

### MEMBERSHIP

The FIUs of Azerbaijan, Benin, the Republic of Congo and Zambia were welcomed as new Egmont Group members following endorsement by the Heads of FIU. Membership now stands at a total of 159 FIUs. The efforts of the new members were recognized, and their sponsors commended for their support throughout the application process.

The Heads of FIU concluded that legislative changes in Nigeria addressed the issues that led to its suspension in 2017. Consequently, the suspension on Nigeria was lifted. The NFIU can now participate in all Egmont events and activities with the full rights of a member.

The Heads of FIU also decided to suspend UIF El Salvador due to a continuous lack of compliance with Egmont Group principles relating to operational independence and autonomy. UIF El Salvador is now excluded from all Egmont Group events and activities. The Heads of FIU recognized the efforts of UIF El Salvador in working to address these concerns through a legislative process but concluded that its operational independence and autonomy cannot be assured. Additional measures could be adopted by the Heads of FIU at the next Egmont Plenary in the Netherlands (July 2019) should no progress be made to correct this deficiency.

### OTHER HIGHLIGHTS FROM THE 25<sup>TH</sup> EGMONT PLENARY:

- » Endorsement of a new Strategic Plan that focuses on enhancing bilateral and multilateral exchanges of financial information between

FIUs, as well as strengthening FIU capability by leveraging traditional and non-traditional partnerships.

- » Four Operational Training Sessions focused on developing financial intelligence and analytics. Topics covered Virtual Currency Regulation and Analysis, Cyber & Emerging Technologies, Professional Money Laundering Networks, and FIU collaboration with Law Enforcement Agencies.
- » FIU France shared an update on the 'No Money for Terror' declaration which was delivered at the CTF Summit in April 2018. The update focused on the Egmont Group's contribution to the international conference, the outcomes of the event, and the move, by FIUs, towards enhanced engagement in combating terrorist financing. Ms. Nicole Rose PSM, AUSTRAC CEO, announced that the next CTF Summit will be hosted by AUSTRAC.
- » FIU Ukraine (SDFM) was voted the winner of this year's Best Egmont Case Award (BECA), with a case that demonstrated successful interaction between national and foreign authorities leading to the confiscation of a significant amount of criminal assets.
- » Further recognition was given to UIF Italy and FIU-Peru. Both received the StAR (Stolen Asset Recovery Initiative) award for successfully recovering assets from multijurisdictional operations that involved corruption.
- » All members of the Egmont Group of Financial Intelligence Units are grateful to AUSTRAC for hosting the 25<sup>th</sup> Egmont Plenary in Sydney. The Egmont Group acknowledges the long-standing contribution of AUSTRAC to the Group as one of its founding members in 1995, and past plenary host in 2003.

## Sydney, Australia

5 October 2018

## ANNEX B – LIST OF EGMONT GROUP MEMBERS

Afghanistan (FinTRACA)	Côte d'Ivoire (CENTIF-CI)	Korea, Republic of (KoFIU)	Saint Kitts and Nevis (FIU-SKN)
Albania (GDPML)	Croatia (AMLO)	Kosovo (NJIF-K)	Saint Lucia (FIA-St. Lucia)
Algeria (CTRF)	Cuba (DGIOF)	Kuwait (KwFIU)	Saint Vincent and the Grenadines (FIU-SVG)
Andorra (FIUAND)	Curaçao (FIU Curaçao)	Kyrgyz, Republic of (SFIS)	Samoa (SFIU)
Angola (UIF-Angola)	Cyprus (MOKAS)	Latvia (KD)	San Marino (FIA San Marino)
Anguilla (MLRA)	Czech Republic (FAU-CR)	Lebanon (SIC)	Saudi Arabia (SAFIU)
Antigua and Barbuda (ONDCP)	Denmark (FIU Denmark)	Liechtenstein (EFFI)	Senegal (CENTIF)
Argentina (UIF-AR)	Dominica (FIU-Dominica)	Lithuania (FCIS)	Serbia (APML)
Armenia (FMC)	Ecuador (UAF)	Luxembourg (FIU-LUX)	Seychelles (Seychelles FIU)
Aruba (MOT)	Egypt (EMLCU)	Macao (GIF)	Singapore (STRO)
Australia (AUSTRAC)	El Salvador (UIF-El Salvador) <i>Suspended</i>	Macedonia (FIO)	Sint Maarten (MOT Sint Maarten)
Austria (A-FIU)	Estonia (Estonian FIU)	Malawi (FIU-Malawi)	Slovakia (FSJ)
Azerbaijan (FIU)	Fiji (Fiji-FIU)	Malaysia (UPWBNM)	Slovenia (OMLP)
Bahamas (FIU-Bahamas)	Finland (RAP)	Mali (CENTIF-Mali)	Solomon Islands (SIFIU)
Bahrain (FID)	France (TRACFIN)	Malta (FIAU)	South Africa (FIC)
Bangladesh (BFIU)	Gabon (ANIF)	Marshall Islands (DFIU)	Spain (SEPBLAC)
Barbados (FIU Barbados)	Georgia (FMS-Georgia)	Mauritius (FIU-Mauritius)	Sri Lanka (Sri Lanka FIU)
Belarus (DFM)	Germany (FIU)	Mexico (FIU-Mexico)	Sudan (FIU Sudan)
Belgium (CTIF-CFI)	Ghana (FIC)	Moldova (SPCSB)	Sweden (NFIS)
Belize (FIU-BZ)	Gibraltar (GCID GFIU)	Monaco (SICCFIN)	Switzerland (MROS)
Benin (CENTIF)	Greece (HELLENIC FIU)	Mongolia (FIU-Mongolia)	Syria (CMLC)
Bermuda (FIA)	Grenada (FIU-Grenada)	Montenegro (APMLTF)	Taiwan (AMLDT)
Bolivia (UIF)	Guatemala (IVE)	Morocco (UTRF)	Tajikistan (FMD)
Bosnia & Herzegovina (FID)	Guernsey (FIS)	Namibia (FIC)	Tanzania (FIU)
Brazil (COAF)	HOLY SEE (Vatican City State) (AIF)	Nepal (FIU-Nepal)	Thailand (AMLO)
British Virgin Islands (FIA)	Honduras (UIF-Honduras)	Netherlands (FIU-NL)	Togo (CENTIF Togo)
Brunei Darussalam (FIE, AMBD)	Hong Kong (JFIU)	New Zealand (NZ-Police FIU)	Trinidad and Tobago (FIUTT)
Bulgaria (FID-SANS)	Hungary (HFIU)	Niger (CENTIF)	Tunisia (CTAF)
Burkina Faso (CENTIF-BF)	Iceland (FIU-ICE)	Nigeria (NFIU)	Turkey (MASAK)
Cambodia (CAFIU)	India (FIU-IND)	Niue (Niue FIU)	Turks & Caicos (FCU)
Cameroon (NAFI)	Indonesia (INTRAC)	Norway (EFE)	Ukraine (SFMS)
Canada (FINTRAC-CANAFE)	Ireland (MLIU)	Panama (UAF-Panama)	United Arab Emirates (AMLSCU)
Cape Verde (UIF-CV)	Isle of Man (FIU-IOM)	Paraguay (UAF-SEPRELAD)	United Kingdom (NCA)
Cayman Islands (FRA)	Israel (IMPA)	Peru (FIU-Peru)	United States (FinCEN)
Chad (ANIF)	Italy (UIF)	Philippines (AMLC)	Uruguay (UIAF)
Chile (UAF)	Jamaica (FID)	Poland (GIF)	Uzbekistan (FIU-Uzbekistan)
Colombia (UIAF)	Japan (JAFIC)	Portugal (UIF-Portugal)	Vanuatu (FIU-Vanuatu)
Cook Islands (CIFIU)	Jersey (FCU-Jersey)	Qatar (QFIU)	Venezuela (UNIF)
Congo Brazzaville (ANIF)	Jordan (AMLU)	Romania (ONPCSB)	Zambia (FIC)
Costa Rica (UAF-Costa Rica)	Kazakhstan (Finmonitoring)	Russian Federation (Rosfinmonitoring)	



## ANNEX C – EGMONT COMMITTEE COMPOSITION (JULY 2017 - SEPTEMBER 2018)

### EGMONT COMMITTEE COMPOSITION (JULY 2017 - SEPTEMBER 2018)

(Endorsed during the 24<sup>th</sup> Egmont Group Plenary in Macao, July 2017)

Chair	FIU-NL, Netherlands
Egmont Group of Financial Intelligence Units	
Vice-Chair	SIC, Lebanon
Egmont Committee (Regional Representative – MENA)	
Vice-Chair	UIF-AR, Argentina
Egmont Committee (Regional Representative – Americas)	
Executive Secretary	
Egmont Group of FIUs	
ESW Representative	FinCEN, USA
Egmont Committee	
Chair, Information Exchange Working Group	
Deputy CEO, AUSTRAC (Jul 2016 – Aug 2018)	AUSTRAC, Australia
Deputy Head, FIU Germany (Sep 2018 – present)	FIU, Germany
Chair, Membership, Support, and Compliance Working Group	
Public Prosecutor, EFE (Jul 2016 – Mar 2018)	EFE, Norway
Head, MROS (Mar 2018 – Sep 2018)	MROS, Switzerland
Chair, Policy and Procedures Working Group	
Head of Legal Department, QFIU (Jul 2016 – Mar 2018)	QFIU, Qatar
Public Prosecutor, EFE (Mar 2018 – present)	EFE, Norway
Chair, Technical Assistance and Training Working Group	
Head, International Cooperation Department, EMLCU	EMLCU, Egypt
Regional Representative – Americas	FINTRAC-CANAFE, Canada
Regional Representative – Asia and Pacific	JFIU, Hong Kong
Regional Representative - Asia and Pacific	AMLO, Thailand
Regional Representative – East and Southern Africa	FIC, South Africa
Regional Representative – Eurasia	Rosfinmonitoring, Russian Federation
Regional Representative – Europe I	HFIU, Hungary
Regional Representative – Europe I	TRACFIN, France
Regional Representative – Europe II	EFFI, Liechtenstein
Regional Representative – Europe II	FIU-IOM, Isle of Man
Regional Representative – West and Central Africa	NAFI, Cameroon

## ANNEX D: OBSERVER AND INTERNATIONAL PARTNER ASSOCIATED WEBSITES

OBSERVER	WEBSITE
Asia Pacific Group on Money Laundering (APG)	<a href="http://www.apgml.org">www.apgml.org</a>
Caribbean Financial Action Task Force on Money Laundering (CFATF)	<a href="http://www.cfatf-gafic.org">www.cfatf-gafic.org</a>
Common Market for Eastern and Southern Africa (COMESA)	<a href="http://www.comesa.int">www.comesa.int</a>
Cooperation Council for The Arab States of The Gulf (GCC)	<a href="http://www.gcc.sg.org">www.gcc.sg.org</a>
Council of Europe Select Committee of Experts on the Evaluation of Anti-Money Laundering Measures (MONEYVAL)	<a href="http://www.coe.int/t/dghl/monitoring/Moneyval">www.coe.int/t/dghl/monitoring/Moneyval</a>
Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG)	<a href="http://www.esaamlg.org">www.esaamlg.org</a>
Eurasian Group on Combating Money Laundering and Financing Terrorism (EAG)	<a href="http://www.eurasiangroup.org">www.eurasiangroup.org</a>
European Commission	<a href="http://www.ec.europa.eu">www.ec.europa.eu</a>
Europol	<a href="http://www.europol.europa.eu">www.europol.europa.eu</a>
Financial Action Task Force on Money Laundering (FATF)	<a href="http://www.fatf-gafi.org">www.fatf-gafi.org</a>
Financial Action Task Force of Latin America (GAFILAT)	<a href="http://www.gafilat.org">www.gafilat.org</a>
Global Organization of Parliamentarians Against Corruption (GOPAC)	<a href="http://www.gopacnetwork.org">www.gopacnetwork.org</a>
Groupe d'Action Contre Le Blanchiment En Afrique Centrale (GABAC)	<a href="http://www.spgabac.org">www.spgabac.org</a>
Groupe Intergouvernemental d'Action Contre Le Blanchiment En Afrique (GIABA)	<a href="http://www.giaba.org">www.giaba.org</a>
Group of International Financial Centre Supervisors (GIFCS)	<a href="http://www.gifcs.org">www.gifcs.org</a>
International Monetary Fund (IMF)	<a href="http://www.imf.org">www.imf.org</a>
International Criminal Police Organisation (Interpol)	<a href="http://www.interpol.com">www.interpol.com</a>
Middle East and North Africa Financial Action Task Force (MENAFATF)	<a href="http://www.menafatf.org">www.menafatf.org</a>
Organization for Security and Co-operation in Europe (OSCE)	<a href="http://www.osce.org">www.osce.org</a>
United Nations Office On Drugs and Crime (UNODC)	<a href="http://www.unodc.org">www.unodc.org</a>
World Bank	<a href="http://www.worldbank.org">www.worldbank.org</a>
World Customs Organization (WCO)	<a href="http://www.wcoomd.org">www.wcoomd.org</a>
INTERNATIONAL PARTNER	WEBSITE
Basel Committee on Banking Supervision	<a href="http://www.bis.org/bcbs/">http://www.bis.org/bcbs/</a>
Basel Institute on Governance – International Centre for Asset Recovery (ICAR)	<a href="http://www.baselgovernance.org/icar">http://www.baselgovernance.org/icar</a>
Camden Asset Recovery Interagency Network (CARIN)	<a href="http://www.assetrecovery.org/">http://www.assetrecovery.org/</a>
Comisión Interamericana para el Control del Abuso de Drogas (CICAD-OAS)	<a href="http://www.cicad.oas.org">http://www.cicad.oas.org</a>
Commonwealth Secretariat	<a href="http://www.thecommonwealth.org/">http://www.thecommonwealth.org/</a>
Council of Europe	<a href="http://www.coe.int/">http://www.coe.int/</a>
European Union	<a href="http://europa.eu/">http://europa.eu/</a>
International Association of Insurance Supervisors (IAIS)	<a href="http://www.iaisweb.org/">http://www.iaisweb.org/</a>
International Bar Association	<a href="http://www.anti-moneylaundering.org/">http://www.anti-moneylaundering.org/</a>
International Criminal Court (ICC)	<a href="https://www.icc-cpi.int/">https://www.icc-cpi.int/</a>
International Money Laundering Information Network (IMoLIN)	<a href="http://www.imolin.org/">http://www.imolin.org/</a>
International Organization of Securities Commissions (IOSCO)	<a href="http://www.iosco.org/">http://www.iosco.org/</a>
International Organisation of Supreme Audit Institutions (INTOSAI)	<a href="http://www.intosai.org/">http://www.intosai.org/</a>
Organisation for Economic Co-operation and Development (OECD)	<a href="http://www.oecd.org/">http://www.oecd.org/</a>
UN 1267 Committee	<a href="http://www.un.org/sc/committees/1267">http://www.un.org/sc/committees/1267</a>
United Nations International Drug Control Programme (UNODC)	<a href="http://www.unodc.org/">http://www.unodc.org/</a>
United Nations Counter-Terrorism Committee Executive Directorate (CTED)	<a href="http://www.un.org/sc/ctc/aboutus.html">http://www.un.org/sc/ctc/aboutus.html</a>
Wolfsberg Group	<a href="http://www.wolfsberg-principles.com/">http://www.wolfsberg-principles.com/</a>
World Bank – AML/CFT	<a href="http://www.amlcft.org/">http://www.amlcft.org/</a>

## ANNEX E: GLOSSARY OF TERMS

- » **AML** – Anti-Money Laundering
- » **APG** – Asia Pacific Group on Money Laundering
- » **BEC** – Business Email Compromise
- » **BECA** – Best Egmont Case Award
- » **CFATF** – Caribbean Financial Action Task Force on Money Laundering
- » **CFT** – Counter Financing of Terrorism
- » **CORFIN** – Corporate Vehicles and Financial Products
- » **CT** – Counter Terrorism
- » **EAG** – Eurasian Group on Combating Money Laundering and Financing of Terrorism
- » **EBC** – Egmont Biennial Census
- » **EC** – Egmont Committee
- » **ECOFEL** – Egmont Centre of FIU Excellence and Leadership
- » **EGS** – Egmont Group Secretariat
- » **ESAAMLG** – Eastern and Southern Africa Anti-Money Laundering Group
- » **ESW** – Egmont Secure Web
- » **EU** – European Union
- » **FATF** – Financial Action Task Force
- » **FSRB** – FATF-Style Regional Bodies
- » **FIU** – Financial Intelligence Unit
- » **FTF** – Foreign Terrorist Fighter
- » **GABAC** – Task Force on Money Laundering in Central Africa
- » **GAFILAT** – Financial Action Task Force of Latin America
- » **GIABA** – Inter-Governmental Action Group against Money Laundering in West Africa
- » **HoFIU** – Heads of Financial Intelligence Units
- » **IEWG** – Information Exchange Working Group
- » **ISIL** – Islamic State of Iraq and the Levant
- » **IT** – Information Technology
- » **LEA** – Law Enforcement Authority
- » **ME** – Mutual Evaluation
- » **MENA** – Middle East and Northern Africa
- » **MENAFATF** – Middle East and Northern Africa Financial Action Task Force
- » **ML** – Money Laundering
- » **MONEYVAL** – Council of Europe Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism
- » **MoU** – Memorandum of Understanding
- » **MSCWG** – Membership, Support, and Compliance Working Group
- » **OAC** – Operational Analysis Course
- » **PPWG** – Policy and Procedures Working Group
- » **SAR** – Suspicious Activity Report
- » **SEC-FIU** – Securing an FIU
- » **StAR** – World Bank’s Stolen Asset Recovery Initiative
- » **STR** – Suspicious Transaction Report
- » **TATWG** – Technical Assistance and Training Working Group
- » **TF** – Terrorist Financing
- » **UAR** – Unusual Activity Report

