# TABLE OF CONTENTS

Remarks by the Chair, Mrs. Hennie VERBEEK-KUSTERS .............................................................. 6
Remarks by the Executive Secretary, Mr. Jérôme BEAUMONT .................................................. 7

Chapter 1: Egmont Group of Financial Intelligence Units (EG) .................................................. 8
  Highlights 2018-2019 .............................................................................................................. 8
  Structure ................................................................................................................................ 10
  Mandate .................................................................................................................................. 11
  Membership ............................................................................................................................ 12
  Distribution of FIUs by region ............................................................................................... 12

Chapter 2: Strategic Plan in Action .......................................................................................... 14
  Egmont Group Strategic Plan 2018-2021 ............................................................................... 15
  Strategic Plan in Action 2018-2019 ..................................................................................... 16

Chapter 3: Measuring Success – Egmont Biennial Census 2019 and Operational Outcomes .......... 18
  EBC Results .......................................................................................................................... 19
  Operations in Numbers ....................................................................................................... 19
  Operational Outcomes: Egmont Group Publications ......................................................... 20

Chapter 4: Looking Ahead ...................................................................................................... 22

Chapter 5: Working Group Developments ......................................................................... 23
  Information Exchange Working Group (IEWG) ................................................................. 23
  Membership, Support and Compliance Working Group (MSCWG) .................................. 26
  Policy and Procedures Working Group (PPWG) ................................................................. 26
  Technical Assistance and Training Working Group (TATWG) ........................................... 28

Chapter 6: Egmont Centre of FIU Excellence and Leadership (ECOFEL) ............................ 29
  Key deliverables and outcomes since establishment ............................................................ 29
  Overview of tools and support available to FIUs ............................................................... 30
Within the Egmont Group Annual Report for the last year of my tenure as Chair of the Egmont Group, you will find the many achievements our group has realised. I want to congratulate all of us for making this happen. I also want to express my sincere gratitude to all individuals who have dedicated their time and efforts to this work. We know your time comes on top of your day jobs. So, thank you to all members, individuals and FIUs who have invested so much in the Egmont Group.

Despite all our good will, nothing would have happened without our hard-working and efficient Egmont Group Secretariat, which is under the leadership of the Executive Secretary, Mr. Jérôme Beaumont. During my tenure as Chair, I have experienced the dedication and tirelessness of this team which works in a highly professional manner, facilitating all of us in our different time zones, weekends and public holidays. As they say in French, “Chapeau.”

One of the goals of my tenure was to have more operational, goal-oriented work completed by the Egmont Group. I think together we have been able to achieve this over the last two years. An example of this accomplishment is the allotment of time during the Plenaries to focus on operational themes. In my final year as Chair of the Egmont Group, I have again experienced how helpful it is to work in a coordinated manner and dedicate our time at a Plenary to address an operational theme. While representing the Egmont Group during various meetings over the last year, I was able to share with audiences the outcomes of our discussions on Public – Private Partnerships, on fighting corruption and on enhancing Public – Public Cooperation, which was discussed at the 26th Egmont Group Plenary. These outcomes are meaningful and can guide future discussions around the globe on these themes.

I’m also very proud of the developments that I’ve seen in ECOFEL. Some of the programs we’ve been looking forward to since the inception of ECOFEL are being shaped at this very moment. I really believe this will bring great value to our members and the Egmont Group as a whole. An Advanced Strategic Analysis course, a support mechanism for the Heads of FIUs, as well as an eLearning platform are being developed.

For the future, I eagerly anticipate the results of the IT review. IT is of increasing importance to supporting our work both as FIUs and the Egmont Group. I also look forward to the increased implementation of the Egmont Group Strategic Plan 2018 – 2021. The goals we have set there are ambitious, but I am confident that together we can achieve them.

During the 2018-2019 year, we have had very productive and extremely well-organised meetings in Jakarta, Indonesia and Sharm el Sheikh, Egypt. Also, I wish to thank you all again for coming to The Hague in July 2019 for the 26th Egmont Group Plenary meeting.

By welcoming six new members and lifting the suspension of 1 member, we have now grown to a membership of 164. This is an impressive membership and I expect our Group will continue to grow. All our members aim to strengthen their joint contributions to the fight against ML and TF.

During the Plenary in The Hague, I handed over the Chairmanship of the Egmont Group of FIUs to Mr. Mariano Federici, Head of the FIU Argentina. I am fully confident in Mariano’s abilities to Chair the Egmont Group. I sincerely congratulate Mariano on his new role and ourselves for having selected this very competent Chair of our group.

Thank you for your confidence in me as your Chair for the last two years. I hope we can continue to work together in the good spirit we have created.
2018-2019 was marked by the fall of ISIS territorial control, the evolution of terrorism becoming an increasingly scattered threat and the rise of technology in the AML/CFT field. This period demonstrated the adaptability of the Group as it sought to address this evolving environment within the framework of the Egmont Strategic Plan.

First, the Group expanded to 164 members, with new members joining the Group: FIUs of the Dominican Republic, Ethiopia, Palestine, Papua New Guinea, Turkmenistan and Uganda. This enhances Egmont outreach and network in the AML/CFT field that is global by nature.

On the Egmont Working Groups and Regions side, among other deliverables, to better address counterterrorism financing the Group released a Report on Lone Actors and Small Cells (summary publicly available) and released a comprehensive compendium on Enhanced Public-Public Cooperation.

More broadly, the Group also worked on:

- Typologies on ML of the Proceeds of Corruption (Public Summary on FIU Tools and Practices for Investigating Laundering of the Proceeds of Corruption)
- Professional ML Facilitators (Public Bulletin on Professional Money Laundering Activities)
- Customs-FIU Cooperation Handbook
- Business Email Compromise – Phase II

From a technical and purely operational point of view, Egmont is always exploring ways to make operational information sharing more fluid. As a result, the Group has developed and aims to implement Flexible, Consistent Information Exchange Standards, which underlines the very operational nature of the Group.

On the ECOFEL side, the Egmont Centre for FIU Excellence and Leadership provided:

- FIU self-assessment tool for Operational Independence and Autonomy
- FIU self-assessment check list PEPs
- Advanced Strategic Analysis Course (Pilot)
- Illegal Wildlife Trade: Mapping exercise

This robust delivery of concrete products was made possible thanks to the forward-thinking leadership of the Egmont Chair, Mrs. Hennie Verbeek-Kusters, in close collaboration with the members of the Egmont Committee and the support of the HoFIU. The implementation of the Egmont Business Plan was made possible thanks to the strong involvement of the Egmont Secretariat team.

The mandate of Mrs. Hennie Verbeek-Kusters ended early July 2019 so, Mr. Mariano Federici, Head of FIU Argentina, has stepped into this prominent position with the support of all Egmont Heads of FIU.

This annual report will help us look back on our achievements and comprehend what still needs to be done from an operational perspective to address the constantly evolving AML/CFT challenges in a nimble manner.

Remarks by the Executive Secretary, Mr. Jérôme BEAUMONT
### HIGHLIGHTS 2018-2019

#### Work Completed

- Compendium on Enhanced Public-Public Cooperation

- Public Summary on Lone Actors and Small Cells

- Public Summary on FIU Tools and Practices for Investigating Laundering of the Proceeds of Corruption

- Public Bulletin on Professional Money Laundering Activities

- Public Bulletin on Business Email Compromise Fraud

- Bulletin on Trafficking in Persons/Human Trafficking and Related Illicit Finance (ESW only, no public version available)

#### Work Started

- Conclusions from Large Scale Cross-Border Money Laundering Schemes

- Money Laundering of the Proceeds of Serious Tax Crimes: enhancing FIUs’ capacities on detection and fostering exchange of information at the domestic and international level (tool kit)

- Combatting online child sexual abuse and exploitation: analysis and application of financial intelligence

- Supporting CFT related research conducted by IMF

#### New member FIUs endorsed:

- Unidad de Análisis Financiero (UAF-DomRep), Dominican Republic
- Ethiopian Financial Intelligence Centre (EFIC), Ethiopia
- Financial Follow-up Unit (FFU), Palestine
- Financial Analysis and Supervision Unit (FASU), Papua New Guinea
- Financial Monitoring Service (FMS), Turkmenistan
- Financial Intelligence Authority (FIA), Uganda
3 MEETINGS
WITH
835 PARTICIPANTS

The HoFIU selected Mr. Mariano FEDERICI of UIF-AR (Argentina) as Egmont Group Chair. Mr. FEDERICI previously served as the Regional Representative for the Americas Region and the EC Vice-Chair.

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

Over 500 participants attended training sessions and workshops with topics including:

- Corporate Vehicles and Financial Products (CorFin)
- Securing an FIU (FIU-SEC)
- Advanced Strategic Analysis Course (A-SAC)
- Disrupting Terrorist Financing Flows
- Role of FIUs in Fighting Corruption
- Customs-FIU cooperation
- Public-Public Cooperation
- Responsibilities and Challenges for Sponsors in the EG membership process
- Information Exchange Standards, etc.

118
Administrative

19
Law Enforcement

19
Hybrid (Administrative/Law Enforcement)

4
Hybrid (Judicial/Law Enforcement)

2
Hybrid (Administrative/Judicial)

2
Judicial

Operations in Numbers*:

23,303 information requests sent among EG member FIUs

34.6M STR/SAR/UAR received by EG members

699M other reports1 received by EG members

Types of FIU:

*Preliminary results of the 2019 Egmont Biennial Census (EBC).
See Chapter 3 for more extensive EBC coverage.

1 For full list of other report types, please see Chapter 3 of this report.
STRUCTURE

Heads of Financial Intelligence Units

Egmont Committee

Regional Groups
- Americas
- Asia and Pacific
- Europe I
- Europe II
- Eurasia
- Middle East and Northern Africa
- East and Southern Africa
- West and Central Africa

Working Groups
- Technical Assistance and Training
- Membership, Support and Compliance
- Policy and Procedures
- Information Exchange

Secretariat

ECOFEL
THE HEADS OF FINANCIAL INTELLIGENCE UNITS (HOFIU)
Governing Body

Establish the organisation’s mandate and priorities while making decisions on any developments affecting the group’s membership, structure, budget and principles. The HoFIU may delegate specific authorities 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 EG, it is comprised of the Working Group Chairs, the Regional Representatives, the ESW Representative and the Executive Secretary. The EC is the decision-maker in specific areas designated by the HoFIU. The EC is responsible for ensuring the EG’s work is horizontally and vertically cohesive.

WORKING GROUPS (WGs)
Operational Bodies

Created by the HoFIU upon the recommendation of the EC, their activities are mandated by the EG’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 and the RGs. The EGS assists with content management on 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 EG.

THE EGMONT CENTRE OF FIU EXCELLENCE AND LEADERSHIP (ECOFEL)
Implementing FIU Capacity Building Programmes

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

EGMONT GROUP SECURE WEB (ESW)
Secure Communications

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 can be shared amongst EG members. The ESW is critical to the functioning of the EG.
MEMBERSHIP

During the reporting period, the Egmont Group welcomed six new members. Membership stands at 164 members.

Distribution of FIUs by region

<table>
<thead>
<tr>
<th>REGIONAL GROUPS</th>
<th># OF FIUS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Americas Regional Group</td>
<td>39</td>
</tr>
<tr>
<td>Asia and Pacific Regional Group</td>
<td>28</td>
</tr>
<tr>
<td>East and Southern Africa Regional Group</td>
<td>10</td>
</tr>
<tr>
<td>Eurasia Regional Group</td>
<td>7</td>
</tr>
<tr>
<td>Europe I Regional Group</td>
<td>30</td>
</tr>
<tr>
<td>Europe II Regional Group</td>
<td>22</td>
</tr>
<tr>
<td>Middle East and Northern Africa Regional Group</td>
<td>14</td>
</tr>
<tr>
<td>West and Central Africa Regional Group</td>
<td>14</td>
</tr>
</tbody>
</table>
Areas of Focus

With over 160 members, the EG has become a truly global organisation. However, more work is necessary to reach FIUs in Africa and Asia that would benefit from becoming EG members. Through outreach and the activities of ECOFEL, the EG supports candidates with training and technical assistance throughout the application process.
Chapter 2

Strategic Plan in Action
Egmont Group Strategic Plan 2018-2021 was approved during the 25th Egmont Group Plenary in September of 2018. The Plan outlines the Group’s vision, which includes a focus on global reach, effective information exchange and strong member capabilities.


Vision, Mission, and Values

The Egmont Group is:

- Based on a foundation of mutual trust, fairness and reciprocity.
- Focused on the proactive exchange of operational and strategic information.
- Sustained by members’ commitment.
- Innovative in its ability to anticipate and prepare for emerging challenges.
- Flexible in its use of policy instruments at national and international levels.
- Proud of the diversity of its members.

Strategic Objectives

- **Bilateral and Multilateral Exchanges of Information**
  
  Increase volume and quality with an emphasis 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 evolving financial landscape.

Strategic Initiatives: Four Areas of Focus

- **ECOFEL**
  
  We are equipped to improve the performance of our members.

- **Africa & Asia**
  
  More outreach is required to FIUs in Africa and Asia who would benefit from joining the EG.

- **Technology**
  
  An assessment of our needs to improve current technology used within the EG is needed.

- **WG Thematic Work**
  
  The EG will continue to integrate our WG’s thematic work.
STRATEGIC PLAN IN ACTION 2018-2019

STRATEGIC OBJECTIVE 1
Facilitate Bilateral and Multilateral Exchanges of Information

- After September 2018, the EG focused on leveraging the benefits of multilateral financial intelligence sharing among members to better disrupt ML/TF risks posed by small cells and lone actors, professional ML facilitators or risks generated by criminal activities like corruption, business email compromise or human trafficking. An alert system for investigations of cases of grand corruption was also implemented.

- For streamlining information exchanges between member FIUs, the EG developed a new information request form. The form allows FIUs to automatically extract, transform and load data to and from FIUs’ databases, therefore reducing manual processing times for analysts.

- The EG explored solutions for addressing the legal and practical impediments preventing FIUs from engaging freely in bilateral and multilateral exchanges of information with other FIUs.

- Six new FIU members joined the organisation during the reporting interval which further reduces the ‘no visibility’ zones within the global financial system.

STRATEGIC OBJECTIVE 2
Strengthen FIUs’ Capabilities

- ECOFEL launched or prepared to launch products and services such as the eLearning platform, mentoring project, support and assistance mechanism, joint DFID funded (ECOFEL & UNODC) project on the illegal wildlife trade, the Advanced Strategic Analysis Course (A-SAC) and FIU requests for assistance.

STRATEGIC OBJECTIVE 3
Expand the Group’s Field of Knowledge

- The EG set up a dedicated work stream for understanding changes and emerging risks in the FIU environment. The work stream focuses on virtual currencies, mobile payments and blockchain.

- The organisation started a large-scale review of its IT infrastructure to enhance the support that the EG could provide to member FIUs.

- The group examined the benefits of Enhanced Public-Public Cooperation arrangements between FIUs and competent authorities for the effective disruption of ML/TF threats.

STRATEGIC OBJECTIVE 4
Develop New Partnerships

- The EG continued to actively engage its traditional partners to better position FIUs for disrupting ML/TF risks. Joint work was conducted with the FATF to identify and learn from the methods criminals use to hide beneficial ownership. Moreover, in collaboration with the FATF, additional work to understand new trends and risks of trade-based money laundering was started.

- A Handbook on Customs – FIU Cooperation was developed with the World Customs Organization. The Handbook will assist FIUs and Customs Services, as well as other law enforcement authorities, to combat financial crime and ML/TF jointly and more effectively.

- In cooperation with Interpol and Europol, the EG supported the IMF by contributing to the development of a Handbook on Combating Terrorist Financing. The Handbook will focus on, among other topics, international financial intelligence sharing mechanisms for CFT purposes.
Strategic Initiatives in Action

STRATEGIC INITIATIVE 1:
ECOFEL

- ECOFEL organised several workshops aimed at meeting its outcomes.
- ECOFEL has:
  - launched the joint DFID-funded project with UNODC related to illicit wildlife trade;
  - considered requests for assistance from FIUs and proposals for cooperation from international partners;
  - developed multilingual materials to promote best practices and tools for assistance;
  - developed partnerships with international AML/CFT stakeholders such as APG, the regional FSRB for the Asia and Pacific region and;
  - begun to develop the ECOFEL support and assistance mechanism.

STRATEGIC INITIATIVE 2:
Africa and Asia

- The EG focused its efforts on the member jurisdictions of the 4 FSRBs covering Africa and Asia and their non EG member FIUs. Out of the 6 new members that joined the EG during the reporting period, 3 are from Africa and Asia:
  - EFIC, Ethiopia (East and Southern Africa Region. Jurisdiction in ESAAMLG)
  - FIA, Uganda (East and Southern Africa Region. Jurisdiction in ESAAMLG)
  - FASU, Papua New Guinea (Asia and Pacific Region. Jurisdiction in APG).
- ECOFEL has engaged FIUs in Africa and Asia by attending FSRB meetings (ESAAMLG and GABAC) and providing classroom trainings to FIUs from the EG MENA region.
- For the Financial Investigations (Financial Flows) in Wildlife and Forestry Crime (FIWF) project, FIUs in Asia and Africa are the primary targets as their knowledge and skills are key for the successful implementation of the project. ECOFEL has started engaging them for their involvement in the project.

STRATEGIC INITIATIVE 3:
Technology

- To enhance the support the EG could provide member FIUs, a large-scale IT Review was launched to understand the current state of the Egmont IT infrastructure and articulate improvements for effectiveness and efficiency.

STRATEGIC INITIATIVE 4:
WG Thematic Work

- To have more strategic, decision-oriented and consequential discussions amongst each other, in 2015, the HoFIU decided to focus Plenary meetings on specific themes. Starting in September 2018, the HoFIU used thematic discussions during Plenaries to enhance the FIUs’ understanding of the opportunities, challenges and prerequisites of effective Public – Private Partnerships as well as of Enhanced Public-Public Cooperation. The approach provided great opportunity to engage relevant external stakeholders and the private sector in the work of EG.
Chapter 3

Measuring Success

Egmont Biennial Census 2019 and Operational Outcomes
The 2019 EBC is a critical tool for supporting international cooperation and information exchange between EG member FIUs. Conducted every 2 years, this iteration of the EBC covers from 2018 until 2019.

**HIGHLIGHTS OF THE 2019 EG蒙特 BIENNIAL CENSUS:**

The top 5 types of authority from which FIUs can collect information are:

1. Law Enforcement Authority
2. Registry of Natural Persons (Passport Database)
3. Bank Regulation / Supervision Authority
4. Customs Service
5. Insurance Regulation / Supervision Authority

**Operations in Numbers:**

- 23,303 information requests sent among EG member FIUs
- 34.6M STR/SAR/UAR received by EG members
- 699M other reports received by EG members
TYPES OF REPORTS RECEIVED BY EG MEMBERS:

<table>
<thead>
<tr>
<th>REPORT TYPE</th>
<th>VOLUME RECEIVED</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suspicious Transaction Reports (STRs) related to Proliferation Financing (PF)</td>
<td>1,854</td>
</tr>
<tr>
<td>Reports relating to TF derived from UN Security Council Resolutions</td>
<td>970</td>
</tr>
<tr>
<td>Reports on accounts of citizens who have accounts abroad</td>
<td>1.3M</td>
</tr>
<tr>
<td>Reports of money transferred electronically out of the jurisdiction (e.g. wire transfer international funds transfer) excluding those reported in suspicious or unusual transaction reporting</td>
<td>118M</td>
</tr>
<tr>
<td>Reports of money transferred electronically into the jurisdiction (e.g. wire transfer international funds transfer) excluding that reported in suspicious or unusual transaction reporting</td>
<td>98M</td>
</tr>
<tr>
<td>Reports of cross border cash money or equivalent moving into and out of the jurisdiction excluding those reported in suspicious or unusual transaction reporting</td>
<td>205M</td>
</tr>
<tr>
<td>Reports of cash transactions</td>
<td>210M</td>
</tr>
<tr>
<td>Reports directly related to terrorist or suspected terrorist financing activity filed by other parties other than reporting entities</td>
<td>37,864</td>
</tr>
</tbody>
</table>

OPERATIONAL OUTCOMES: EGMONT GROUP PUBLICATIONS

**CTF report: Lone Actors and Small Cells**

By examining more than 120 recent case incidents, the report identifies ways to better respond to the threat of lone actor and small cell terrorist threats to public safety. The report highlights trends, methods and the role of financial intelligence in order to tackle lone actors and small cells' activities.

**FIU Tools and Practices for Investigating Laundering of the Proceeds of Corruption**

This report examines tools, methods, techniques and indicators of laundering the proceeds of corruption used by FIUs and other authorities. This report will enable FIUs to learn from shared experiences, as well as strengthen their ability to identify and analyse cases related to laundering the proceeds of corruption.

**Public Bulletin on Professional Money Laundering Activities**

This bulletin focuses on the shadow market of professional facilitators who provide services for moving, redistributing and laundering illicit funds. The bulletin should assist authorities and reporting entities in better detecting, investigating and reporting the proceeds of professional money laundering activities.

**Public Bulletin on Email Compromise Fraud**

The EG issued the bulletin to alert member FIUs and their counterparts of the increasing threat posed by Business Email Compromise (BEC) fraud schemes. BEC fraud schemes are among the fastest-growing cyber-enabled crime threats affecting financial institutions which expose the financial sector to billions of dollars in losses worldwide. These schemes target business organisations, professionals and individuals by compromising email accounts by sending (or causing to be sent) false payment instructions and other information used to conduct financial fraud.

**Bulletin on Trafficking in Persons/Human Trafficking and Related Illicit Finance**

The purpose of this bulletin is to strengthen FIUs’ awareness and understanding of human trafficking, share operational best practices and enhance international efforts to combat human trafficking. The IEWG will begin to develop a white paper on this subject.
The 26th Egmont Group Plenary Meeting in The Hague, attended by 497 participants, addressed the topic of Enhanced Public-Public Cooperation (PPC) from the perspective of an FIU. The goal was to raise awareness among EG members on how FIUs could enhance their cooperation with competent authorities to better identify, understand and tackle ML/TF risks and to fight ML/TF and predicate offences more effectively.

**Opportunities – Enhanced PPC:**

- Creates the framework for depriving criminals of illegally acquired assets
- Reduces duplication of efforts of agencies looking into the same issues for different purposes (e.g. for determining the taxable income, for determining regulatory breaches or for determining the extent of damages caused through criminal behaviour)
- Creates an intelligence-driven approach and assists in fast-tracking cases
- Fosters legislative framework alignment to enhance information sharing and helps with sharing investigative costs and resources
- Broadens the scope and depth of investigations, while enhancing their quality and closing potential skill gaps among competent authorities

**PPC challenges include:**

- Availability of suitable staff and managing staff of various agencies
- Reluctance caused by varied legislation and policies governing domestic stakeholders
- Constraints (e.g. legislative, budgetary or resource) that limit investigative abilities or information sharing
- Integrating Public-Public Cooperation with Public-Private Partnerships to increase the reach of preventive and enforcement actions
- Ensuring access to information and the subsequent protection of information disseminated within the framework of Public-Public Cooperation
- Lack of common terminology

**Lessons learned, PPC:**

- Is important for better identification of ML/TF risks and associated predicate offences
- Requires respect for each individual agency's mandates
- Enhances trust among partners only if confidentiality of information shared is guaranteed
- Starts with willingness to share information across role players
- Helps with knowledge sharing and skills development
IEWG

Following The Hague Plenary (July 2019), the IEWG will:

- Discuss possible approaches to help FIUs identify networks and patterns for large scale cross-border ML schemes. The project will define and test indicators using past and current data, collect modus operandi as well as sample cases and develop other useful tools for EG members. Relevant findings will also feed into the joint FATF/EG work on Trade-Based Money Laundering.
- Gather best practices to enhance FIUs’ capacities for detecting money laundering related to serious tax crimes. This work will foster exchanges of information on serious tax crimes at both domestic and international levels.
- Examine, in cooperation with the private sector, how financial intelligence can be used to combat online streaming of child sexual abuse and exploitation (CSAE). Strategic intelligence, red flags/indicators and best practices on disrupting CSAE are expected to be produced through this work.
- Develop a white paper on human trafficking.
- Work jointly with INTERPOL and EUROPOL to support IMF in developing a CTF handbook intended to reinforce the international financial intelligence sharing mechanisms for CTF purposes.
- Implementation of a standardised information request form.
- Coordinate with WCO for the finalisations of the Customs-FIU Cooperation Handbook.
- Enhance the usage of its products.

PPWG:

Following The Hague Plenary (July 2019), the PPWG will:

- Examine approximately 50 impediments to bilateral and multilateral information exchange preventing member FIUs from cooperating freely as required by the Egmont Group Principles for Information Exchange. These examinations have been conducted with the intention of recommending solutions to the HoFIU.
- Look into how to clarify interpretations of EG terminology related to cooperation between FIUs (e.g. ‘for intelligence purposes only,’ ‘prior consent,’ ‘for investigation purposes,’ etc.).
- Work on enhancing the mechanism that allows Egmont to identify members FIUs that may face problems with information exchange.

TATWG:

Following The Hague Plenary (July 2019), the TATWG will:

- Cooperate with the FIUs of Monaco and Cuba for translating the Corporate Vehicles and Financial Products Course (e-CorFin) into French and Spanish.
- Support member FIUs in delivering internal training to FIU staff.
- Process, in coordination with the ECOFEL, requests for technical assistance on drafting legislation or identifying relevant trainers for various training needs.

MSCWG:

Following The Hague Plenary (July 2019), the MSCWG will:

- Continue with the preliminary reviews under the Procedural Trigger 3 of the revised Support and Compliance Process related to MER ratings, building a special pool of experts for conducting this task.
- Develop and monitor action plans of FIUs that were found non-compliant under Trigger 3 revised Support and Compliance Process related to MER ratings.
- Continue the vetting and screening of candidate FIUs based on the current Membership procedure and Egmont Criteria to determine and ensure that the legal and operational requirements to become an Egmont member are fulfilled.

Egmont Centre of FIU Excellence and Leadership (ECOFEL)

Following The Hague Plenary (July 2019), the ECOFEL will:

- Concurrently launch their eLearning platform and the first Egmont eLearning course, Corporate Vehicles and Financial Products Course (e-CorFin). e-CorFin is based on the TATWG’s Corporate Vehicles and Financial Products course.
- Develop more AML/CFT related eLearning courses to help further increase the capacity of FIUs globally.
- Implement the ECOFEL mentorship program, which is a key component in the ECOFEL’s mission to promote leadership and excellence within FIUs. Through the mentor network, the ECOFEL aims to strengthen HoFIU leadership competencies while also establishing expertise networks that can support the exchange of best practices and lessons learned. The ECOFEL will look for experienced Heads or former Heads of FIUs to become mentors.
- Organise regional FIU operational independence and autonomy outreach events to further enhance the understanding of the topic.
- Improve pilot content for A-SAC and deliver the package globally.
Chapter 5 | Working Group Developments

INFORMATION EXCHANGE WORKING GROUP (IEWG)

The EG’s Information Exchange Working Group (IEWG) has continued its efforts to build opportunities for FIUs to share operational intelligence, develop technical solutions to enable effective information exchange and work collaboratively to address emerging ML/TF risks and vulnerabilities.

The IEWG is chaired by Mr. Marko STOLLE, (FIU, Germany) with the following Vice-Chairs: Ms. Alexandra BOBYLKOVA (FFMS, Russia), Ms. Heather MOYE (FINCEN, USA), Mr. Elad WIEDER (IMPA, Israel), Dr. Youssef EL OMARY (UTRF, Morocco), Mr. Dian Ediana RAE (INTRAC, Indonesia) and Mr. Ken O’BRIEN (FINCEN, USA).

Over the period from 1 October, 2018 – 30 July 2019, the IEWG met on two occasions. The first meeting was hosted by INTRAC, Indonesia (in Jakarta) where the IEWG had two days of working events (29 January 2019 – 30 January 2019). To facilitate active participation, the IEWG was divided into 5 smaller groups for breakout sessions. These groups discussed issues relevant to the IEWG in general, stream-specific subjects and other important topics.

The focus of the IEWG work in Jakarta was related to the development of the new Governance Renewal Process. The need for such a process was identified during the 25th Egmont Group Plenary meeting in Sydney. As a result, in Jakarta, the IEWG members outlined the main framework for the future development of the group. The framework establishes that the IEWG should be nimble, flexible and goal-orientated to encourage the development of operative results with high practical value based on the needs of the membership. To achieve this goal, the IEWG decided to take important internal steps to reorganise and implement structure optimisation approaches.

In order to achieve these goals, the IEWG leadership proposed that the group consider the endorsement of new Standard Operating Procedures (SOP) for IEWG projects and amend the IEWG Rules on Internal Procedures. Subsequently, it was proposed that the IEWG streams be restructured and aligned with the IEWG’s three-key pillar mandate as per the Rules on Internal Procedures. The main goals of the governance renewal process are to increase the effectiveness of the project work, foster the active participation of all members, enhance the role of the Vice-Chairs and give more flexibility to IEWG to address new challenges.

All these new governance documents were discussed and approved during the IEWG meeting in The Hague (1 July 2019 – 2 July 2019). The goals of these documents are as follows:

- The new Standard Operating Procedures (SOP) serve to support and formalise IEWG project development. These documents should help project teams better understand exact procedures, roles and responsibilities and necessary steps for effective project management throughout various project phases. The SOPs also improve possibilities for the active participation of members, especially smaller FIUs, in project work.
- The amendments to the IEWG Rules on Internal Procedures were conducted in order to reflect these changes and, ultimately, make the working process more effective while giving the necessary level of flexibility required by the IEWG.

The proposed governance renewal was a result of number of stocktaking exercises, surveys and breakout sessions where IEWG members were asked to identify their needs and priorities.

During the meeting in The Hague, the IEWG approved all 8 ongoing projects included in the 2018-2019 Business Plan, namely:

Business Email Compromise – Phase II

Following this work, the Bulletin alerts competent authorities and reporting entities of key typologies and money laundering risks associated with Business Email Compromise (BEC) fraud schemes. The Bulletin assists authorities and reporting institutions to better detect, identify, report and investigate BEC fraud schemes and disrupt these illicit finance networks.

The finalised EG Bulletin is available on the Egmont website:

https://egmontgroup.org/en/content/new-publication-egmont-group-bulletin-business-email-compromise-fraud

CTF Project: Lone Actors and Small Cells

By examining more than 120 recent cases, the report identifies ways to better respond to threats of lone actor and small cell terrorist attacks. The report highlights trends, methods and the role of financial intelligence, while specifying indicators related to terrorism and terrorism financing activities of lone actors and small cells.

The report is uploaded to ESW and a Public Summary of the report is available on the Egmont website:

Typologies on ML of the Proceeds of Corruption

The purpose of the report is to examine tools, methods, techniques and indicators used by FIUs and other authorities in order to collect, analyse and disseminate financial intelligence on cases relating to corruption and laundering proceeds of corruption. This report enables FIUs to learn from shared experience, strengthen their ability to identify and continue adding value to multi-stakeholder anti-corruption efforts. The Report should also support private sector reporting entities in their efforts to identify and subsequently report cases of laundering the proceeds of corruption.

The report is uploaded to ESW and a Public Summary of the report is available on the Egmont website:


Professional ML Facilitators

The focus of the Bulletin is on the shadow market of professional facilitators, who provide services of moving, redistributing and laundering illicit funds. Professional money laundering facilitators work with money irrespective of its origin, using expertise to hide, conceal and disguise illicit funds, therefore providing “Money Laundering-as-a-service.” This Bulletin should assist authorities and reporting entities in better detecting, investigating and reporting the proceeds of professional money laundering activities.

The Executive Summary and training materials are uploaded to ESW and a Public Bulletin is available on the Egmont website:

https://egmontgroup.org/en/content/new-publication-egmont-group-bulletin-professional-money-laundering-facilitators

Flexible, Consistent Information Exchange Standards project

This project resulted in the development of standardised forms which were produced to facilitate the structured operational information exchange between FIUs.

All documents are for internal use only.

Egmont Group Public Website Renovations project

A report was produced to support the EG’s website renovations process.

Customs-FIU Cooperation Handbook (phase I)

The EG and the WCO’s goal with this project is to create a Customs-FIU Cooperation Handbook to assist Customs Services and FIUs in collaborating effectively to combat the scourge of ML and TF. The Handbook’s focus is to support FIUs and Customs’ efforts in the identification of efficient communication and cooperation tactics in cases of common interest and, subsequently, guide them through the establishment of internal policies and procedures in support of this goal. This Handbook also provides an overview of current challenges and recently identified modi operandi faced by Customs Services and FIUs in their fight against ML and TF. This project will be finalised in Phase II when WCO will also endorse the Handbook.

 Trafficking in Persons/Human Trafficking and Related Illicit Finance Bulletin

The Bulletin aims to increase awareness of AML/CFT and human trafficking, share operational best practices and enhance international efforts to combat human trafficking. Egmont member FIUs are encouraged to use or, where appropriate, amend the Bulletin in order to suit their individual domestic needs. The IEWG agreed to continue its work on the topic and will develop a White Paper as part of its second phase.

For internal use only.
During the meeting in The Hague, the IEWG also approved its new Annual Business Plan 2019 – 2020 which determines the main activities the Working Group will pursue in support of the four Egmont Strategic Objectives. The projects included in the new Business Plan 2019 – 2020 are:

### Under Stream 1
Promotion, Support and Facilitation of Bilateral and Multilateral Exchange of Financial Intelligence and Strategic Information

- Conclusions from Large Scale Cross-Border Money Laundering Schemes
- ML of Seious Tax Crimes - Enhancing FIU's Capacities on Detection and Foster Exchange of Information at the Domestic and International Levels
- Asset Recovery – the role of FIUs (TBD)
- Operational Guidance on Virtual Assets from FIU’s perspective (TBD)

### Under Stream 2
Increasing the Level of Knowledge and Understanding on Key ML/TF threats and National Security Risks

- Combatting online child sexual abuse and exploitation: analysis and application of financial intelligence
- Cybercrime Risks and FinTech
- CFT-related research (e.g. International Monetary Fund CTF Handbook)
- Human Trafficking – Phase II (White Paper)

### Under Stream 3
IT Innovations and Enhancing of Data Analytics

- Project on IT tools (TBD)
- Flexible, Consistent Information Exchange Standards (implementation phase)
- Customs-FIU Cooperation Handbook (phase II)

The IEWG IT professionals had their two regular meetings in Jakarta and The Hague. Among the topics discussed were the IT aspects of the XML schema and PDF, big data analytics and experimentation with graph analyses, goAML updates, the EG public website renovations and more.
During the period 1 October 2018 – 05 July 2019, the PPWG:

- relevant to the global AML/CTF environment.

As the custodian of core EG documents, the PPWG ensured that they remain consistent with the strategic plan of the organisation and continue to be

- 26 EG Meetings in Jakarta, Indonesia, and in

-ing period.

Additionally, under the Support and Compliance Process, the MSCWG continued to address a non-compliance issue related to the legal framework of one FIU. After providing the necessary guidance to tackle a shortcoming related to operational independence and autonomy, which resulted in the necessary legislative changes, the MSCWG recommended that the HoFIU lift the suspension of the concerned FIU.

Moreover, under the Support and Compliance Process, the MSCWG continued the initial review of FIUs referred by the Egmont Committee under Procedural Trigger 3, which is based on weak ratings from FATF Mutual Evaluation Reports (Recommendations 29 and 40). The MSCWG also developed action plans with 2 FIUs in order to overcome non-compliance issues identified in the initial reviews established by Procedural Trigger 3.

Finally, in July 2019, the MSCWG adopted its Business Plan 2019-2020 which contains, among others, the following initiatives:

- Continue supporting and monitoring the membership processes of candidate FIUs, with the support of the sponsor FIUs and the MSCWG Pool of Experts.
- Further work on reviews and providing support based on relevant triggers of the Support and Compliance Process.
- Continue enhancing the current MSCWG Pool of Experts in order to assist with the Support and Compliance issues.

POLICY AND PROCEDURES WORKING GROUP (PPWG)

The Policy and Procedures Working Group continued to provide a forum for member FIUs to identify important operational policy and strategic issues affecting the EG and coordinate a response across the organisation and partner organisations. To realise this mandate, the PPWG looked at the underlying causes impeding free information exchange between FIUs, promoted the understanding of the EG standards and facilitated their common interpretation and application. The PPWG also assisted other Egmont bodies on legal issues, while following legal or regulatory work of interest conducted in other international fora.

The PPWG is chaired by Mrs. Anne Mette WADMAN (EFE, Norway) with Vice-Chairs: Mrs. Elvira KROSS (MOT, Aruba) and Mr. Lucas KNEEPHELHOUT (FIU-Netherlands). The Group acknowledges the valuable contribution of Mr. Pekka VASARA (RAP, Finland) who acted as Vice-Chair during the reporting period.

Between 1 October 2018 and 05 July 2019, the PPWG met on two occasions: in January 2019, during the EG Meetings in Jakarta, Indonesia, and in July 2019 during the 25th Egmont Group Plenary in The Hague, The Netherlands.

As the custodian of core EG documents, the PPWG ensured that they remain consistent with the strategic plan of the organisation and continue to be relevant to the global AML/CTF environment.

During the period 1 October 2018 – 05 July 2019, the PPWG:

- Developed and began implementing a new business plan, aligned with the 2018-2021 Egmont Group Strategic Plan (adopted in September 2018). 7 projects were considered by the PPWG to support the organisation in achieving its strategic objectives. 3 high priority topics have been selected for immediate implementation.
- Emphasised the identification of impediments to bilateral and multilateral information exchange which are impeding member FIUs from freely cooperating as required by the Egmont Group Principles for Information Exchange. Following a review of the EG’s post-2012 operational reports, the mutual evaluation reports published by the FATF/FSRBs under the 4th Round of Mutual Evaluations and interviews with the Chairs of the WGs/RGs, a dedicated project team identified 50 legal and practical impediments to the free exchange of information between FIUs. These impediments were then mapped against the relevant Egmont Principles for Information Exchange and solutions were contemplated on how the EG can help member FIUs address them. The outcome of this work will be a report with targeted recommendations regarding possible solutions to the identified impediments.
- Analysed the Support and Compliance Process – Procedural Trigger 4: Limited Statistical Review to identify ways the process could be enhanced when identifying members experiencing problems with the timely exchange of relevant information and provide targeted support to help them address the deficiencies. A designated team determined that the mechanism failed to consider the quality of FIU interactions when exchanging information. PPWG recommended the HoFIU postpone the implementation of this mechanism until the Group considers ways to enhance the Procedural Trigger 4.
- Looked into developing a Glossary of Key Egmont Group Terminology to clarify interpretations of Egmont terminology. While acknowledging the diversity of the EG membership, a project team addressed various understandings by proposing more detailed definitions in a glossary. The final document will also consider definitions already published by the FATF.
<table>
<thead>
<tr>
<th>Strategic Objective</th>
<th>Project</th>
<th>Priority 2018-2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facilitate Bilateral and Multilateral Exchanges of Financial Information</td>
<td>Address previously identified impediments to bilateral and multilateral information sharing between FIUs</td>
<td>HIGH PRIORITY</td>
</tr>
<tr>
<td></td>
<td>Develop a Glossary of key Egmont Group Terminology</td>
<td>HIGH PRIORITY</td>
</tr>
<tr>
<td></td>
<td>Review the Support and Compliance Process - Procedural Trigger 4 (Limited Statistical Review)</td>
<td>HIGH PRIORITY</td>
</tr>
<tr>
<td>Strengthen FIU’s Capabilities</td>
<td>Ensure consistency between EG expectations for candidate FIUs and members</td>
<td>MEDIUM PRIORITY</td>
</tr>
<tr>
<td></td>
<td>Further understand the Role of FIUs in Countering Financing of Proliferation</td>
<td>LOW PRIORITY</td>
</tr>
<tr>
<td>Develop New Partnerships</td>
<td>Understand the FIU Boards – context, opportunities, challenges</td>
<td>LOW PRIORITY</td>
</tr>
<tr>
<td></td>
<td>Develop an Egmont Additional Voluntary Contributions Program</td>
<td>MEDIUM PRIORITY</td>
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</tbody>
</table>

- Developed the Egmont Group Additional Voluntary Contributions Program that informs potential EG donors about the criteria and principles used by the organisation when accepting funding.
- Developed a new succession planning model for the Egmont Group that details the creation of 2 new EG Vice-Chair positions, while maintaining the Chair’s 2-year mandate. A designated project team implemented limited changes to the Charter of the EG to reflect the new succession model, amended the selection procedure for the Chair of the EG and developed new procedures for the selection by the HoFIU of the Vice-Chairs of the EG by the HoFIU.
- Made recommendations to the HoFIU for the revision of the Support and Compliance Process: Procedural Trigger 3 to consider Mutual Evaluation reports (MERs) effectiveness findings when determining whether member FIUs comply with the EG requirements listed in the Egmont Group Charter and Principles for Information Exchange.
- Provided advice to the Membership, Support and Compliance Working Group on the interpretation of the Support and Compliance Process – Procedural Trigger 2: Information obtained affecting a member’s membership status, consistent with the Egmont Group core documents.

The PPWG, through its policy developments and projects, ensures FIUs continue to exchange intelligence and expertise to address the challenges stemming from evolving money laundering and terrorist financing threats.
TECHNICAL ASSISTANCE AND TRAINING WORKING GROUP (TATWG)

The TATWG developed a business plan consistent with the Egmont Group Strategic Plan in 2018-2021 to continue work on developing and delivering technical assistance and training through multiple channels for both Egmont Group member and non-member FIUs.

During the reporting period, the TATWG was chaired by Mr. Amr SAYED (EMLCU, Egypt) with Vice-Chairs Mr. Phil HUNKIN (CIFIU, Cook Islands) and Mr. Stephen JOHN (FINTRAC, Canada).

While the ECOFEL remained a significant priority of the TATWG (see Chapter 6), the Working Group also developed and implemented training courses for FIUs which are available in various languages. Those activities included:

- **eLearning –** The EG, in cooperation with the International Asset Recovery Centre (ICAR) has successfully developed the Operational Analysis Course (OAC) in English, French, Latvian, Russian and Spanish. The course is free and available to all Egmont members and non-members. A new eLearning course on countering terrorism financing is in progress. During the reporting period, the eCourse had 1400 participants and that number continued to grow. The course is available at: [https://www.baselgovernance.org/elearning-courses/operational-analysis](https://www.baselgovernance.org/elearning-courses/operational-analysis).

- **Successfully updating and presenting the “Securing an FIU” training package and the corresponding train-the-trainer.** The course covers the following topics:
  - Physical Security
  - Personnel Security
  - Document Security
  - Information Security
  - Continuity of Operations

  The course provides FIU members with best practices for developing and implementing security policies and procedures from a risk-based perspective. As one size does not fit all, the course can be adapted to suit different FIUs.

- **Plenary Training events –** The TATWG organised the Executive Training for HoFIU to address “Public-Public Partnership” and 8 Operational Training Sessions for non-HoFIU delegates during the Egmont Group Plenary meetings during this period. The topics included:
  - Roles of the Sponsors under the Egmont Membership Process: Responsibilities and Challenges
  - The FIU-Customs Cooperation Handbook
  - ESW Review and 2019 EBC Changes
  - Small Cells, Lone Actors
  - Typologies on Corruption
  - Flexible, Consistent Information Exchange Standards
  - ECOFEL’s Skills Enhancement Program: Advanced Strategic Analysis Course
  - Σ3 – A Proof of Concept Between Domestic Partners Using the Decentralized Approach to Connect Information

**Best Egmont Case Award (BECA):** As part of the annual plenary event, the TATWG led the initiative to select the 2019 BECA. During the reporting year, the BECA competition was conducted in tandem with the World Bank’s Stolen Asset Recovery Initiative (StAR). There were 19 cases received from 14 FIUs with the winner being UIF-Peru.

These accomplishments highlight the devotion of the TATWG and ECOFEL to improving the professional capabilities of FIUs worldwide in the fight against ML/TF. Finally, the TATWG valued the support and participation of observers and international partners in the EG meetings and their facilitation of training workshops. These contributions were vital in improving the TATWG work for the benefit of membership.
KEY DELIVERABLES AND OUTCOMES SINCE ESTABLISHMENT

Preparations for the launch of the ECOFEL eLearning platform and eCorFin course

FIUs are increasingly interested in onsite training methods for their staff. Given the advantages of eLearning, the ECOFEL began to establish an eLearning platform to help FIUs improve their skills. Through its eLearning platform, along with its EG/ECOFEL online courses, the ECOFEL intends to develop content and provide a substantial number of third-party courses for FIUs. These courses will cover skills and topics such as building leadership, analysis, communications, project management, information technologies, etc.

CorFin courses

In collaboration with the TATWG, two in-room Corporate Vehicles and Financial Products (CorFin) courses were delivered in the Europe I, Europe II and MENA regions. The training packages are available in English, Spanish and Russian. The CorFin course provides analysts with a greater understanding of how to conduct advanced tactical analysis on corporate vehicles and financial products.

Advanced Strategic Analysis Course (A-SAC) development

This new program is designed for experienced analysts responsible for conducting strategic analysis within their respective FIUs. Key features of the A-SAC include exercises involving actual data collected by FIUs and a mentoring component. A-SAC hopes to strengthen the strategic analysis skills of FIU staff and enhance FIU analytic capabilities so that the scope and quality of strategic analysis will increase.

Financial Investigation (Financial Flows) in Wildlife and Forestry Crime (FIWF)

The ECOFEL is partnering with the United Nations Office on Drugs and Crime (UNODC) for the implementation of the Financial Investigation (Financial Flows) in Wildlife and Forestry Crime (FIWF) project. This project seeks to improve the detection of wildlife crime proceeds. The FIWF project will enable the sharing of information which could lead to an increased number of financial investigations, case-evidencing and, ideally, prosecutions. The UNODC focus is on law enforcement authorities, whereas the ECOFEL will work with FIUs. In this reporting period, the ECOFEL started working on the research output of the project. In the next reporting period, the ECOFEL plans to organise several events covering the origin, transit and destination jurisdictions. The ECOFEL will also work with the FIUs from those jurisdictions to complete the research paper.

FIU operational independence and autonomy outreach events – developing FIU Leadership

The ECOFEL organised an FIU Operational Independence and Autonomy discussion within the GABAC plenary meeting in March 2019. The ECOFEL will be working with other FSRBs to organize more FIU Operational Independence and Autonomy events within their plenary meetings.
**FIU and media engagement – FIU media toolkit**

In January 2019, the ECOFEL, in collaboration with QFIU (Qatar), organised a consultation entitled “Strengthening the Network: An FIU and Media Consultation.” The consultation brought together over 40 FIU officials and media professionals from Africa, Asia, Europe and the Middle East. The ECOFEL has recognised this opportunity for FIUs and the media to better understand their collective contribution to global fight against ML/TF. Together, the media and FIUs could cooperate not only for accurate media reporting but also engage with and complement each other’s work, especially since many FIUs do not have designated communication function. This consultation aligns with the ECOFEL’s mandate of developing tools to help FIUs earn the public and political support they require for their operations. The consultation also forms part of the ECOFEL’s ongoing work to understand FIU perspectives, share best practices and create foundation for the development of the FIU media toolkit expected in 2020. The toolkit will present templates for media releases, solutions for addressing crises, best practices for media training on ML/TF and predicate offences, etc.

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**The Hague Plenary**

The ECOFEL developed FIU toolkits and presented them at the Plenary meeting in The Hague. In addition, during The Hague Plenary, the ECOFEL set up a designated area for FIUs to try online tools such as:

- FIU requests for assistance form: [https://www.research.net/r/request-for-assistance](https://www.research.net/r/request-for-assistance)
- PEP self-assessment checklist: [https://www.research.net/r/PEPs](https://www.research.net/r/PEPs)
- FIU Operational Independency and Autonomy checklist

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**OVERVIEW OF TOOLS AND SUPPORT AVAILABLE TO FIUS**

**FIU Requests for Assistance.**

For a long time, the EG has received requests for assistance from member and candidate FIUs to help them develop or further enhance their core functions. With the establishment of the ECOFEL, the EG acquired an operational arm to address the requests from FIUs. During the reporting period, the ECOFEL received several FIU Requests for Assistance relating to FIU capacity building and delivered assistance when possible.

**Heads of FIUs Support and Assistance Mechanism concept and tool development.**

Heads of FIUs have requested an effective support mechanism for when they are faced with various atypical issues and challenges that extend beyond the scope of FIU work. Supporting FIUs confronted with such circumstances is considered an area to which the ECOFEL can contribute. The ECOFEL has developed a concept note for the Heads of FIUs Support and Assistance Mechanism (SAM) in the second quarter of 2019 and presented the draft Concept Note to the ECOFEL Program Team (EPT). In addition to drafting the concept note, the ECOFEL studied the implementation of SAM. The mechanism is undergoing a last round of reviews and approvals to ensure that it can be smoothly implemented. Several “SAM Experts” have already been identified and accepted as parts of the mechanism.

**Online FIU Operational Independence and Autonomy Self-Assessment Tool.**

In April 2019, during the First Forum of Heads of FIUs for the Americas Region, the online tool to assist FIUs in identifying areas where FIU operational independence and autonomy can be strengthened was launched. ([https://www.research.net/r/oia-checklist](https://www.research.net/r/oia-checklist))

**Awareness raising video production.**

The ECOFEL also made efforts to promote the role of FIUs and the EG in global and national AML/CFT networks. To bolster awareness of the EG and FIUs, the ECOFEL produced videos and, in April 2019, finalised the work on the “What is an FIU?” video. This video has been translated into Spanish, Arabic and Latvian. All versions of this video will be uploaded to the ECOFEL eLearning Platform following its launch. A new video “What is the Egmont Group?” is currently under development.
Chapter 7

Regional Group Developments
AMERICAS

The Americas Regional Group is made up of FIUs from North America, South America Central America and the Caribbean, which jurisdictions are members of the Financial Action Task Force (FATF), the Caribbean Financial Action Task Force (CFATF), the Financial Action Task Force of Latin America (GAFILAT). During the reporting period, 33 FIUs were members of the Americas Regional Group.

Throughout this reporting period, the Americas Regional Group was chaired by Mr. Mariano FEDERICI (UIF-AR, Argentina) and Mr. Luc BEAU-DRY (FINTRAC, Canada). Mrs. Anne-Marie KEMNA (FIU Curaçao) and Mr. Sergio ESPINOSA (UIF-Peru) were elected as new Regional Representatives for the 2019-2021 period.

REGIONAL GROUP HIGHLIGHTS FROM THE REPORTING PERIOD:

- Approval of America’s 2019-2021 Regional Plan: Consistent with the Egmont Group’s 2018 – 2021 Strategic Plan Framework, the Americas Region adopted its regional plan consisting of two key themes:
  - Operational independence and autonomy. As corruption may involve important individuals or stakeholders within public office and/or private industry, operational independence and autonomy is seen as a critical component for FIUs to conduct their work without undue influence or interference. Some of the key points to consider for this theme include, but are not limited to:
    - The FIUs ability to investigate or develop intelligence on corruption cases;
    - Autonomy could offer greater protection from external pressures, such as the political class and;
    - Sharing information and collaborating with anti-corruption domestic bodies.
  - Working with Reporting Entities (REs): Over the past few years, a significant and important trend that has led to FIUs emphasising the importance of strengthening their relationship with domestic reporting entities. As noted in the Egmont ISIL project, sharing critical information on terrorist financing indicators helped improve the quantity and quality of STRs submitted to FIUs. Improving STR quality results leads to the development of better financial intelligence for domestic and international law enforcement and intelligence agencies. Improving this relationship could be of significant value in combatting corruption, and could include:
    - Developing indicators and red flags for Reporting Entities;
    - Improving guidance to Reporting Entities on what should they look for;
    - Reinforcing the role Reporting Entities play in anti-corruption prevention and investigations within the political class and;
    - Asking banks for more due diligence for individuals more susceptible to scrutiny.

- Regional meeting in Miami, April 10th – 11th, 2019: To tackle the ongoing need for FIUs to be fiscally accountable to taxpayers, while continuing to meet and address substantial issues facing FIUs within the Region, an intersessional meeting within the America’s Region was organised. The city of Miami was chosen to host the meeting due to its recognised role as an important nexus of financial activity in the region. Hosted by FINCEN, USA, the meeting was held at the Florida International University. This intersessional meeting enabled FIUs within the Americas region to address the following objectives:
  - Promoting greater involvement and integration among Latin American, North American and Caribbean FIUs;
  -Addressing substantive issues of common interest and concern to FIUs in the Americas Region, based on prior discussions at the most recent EG Meetings and;
  - Promoting participation of FIUs in the Americas Region in future EG Plenaries and Working Group Meetings.
  - In-keeping with the America’s Regional Plan, three key themes were identified and discussed:
    - Operational Independence and Autonomy;
    - Public-Private Partnerships (PPPs) and;
    - Public-Public Partnerships.

- Delivery of Advanced SAC – May 13th – 17th, 2019, Port of Spain, Trinidad and Tobago: A pilot for an Advanced Strategic Analysis Course was developed and delivered through a partnership consisting of the ECOFEL, FINTRAC, Canada, FINCEN, USA and FIUTT, Trinidad and Tobago. Hosted by FIUTT, Trinidad and Tobago, the pilot was delivered between 13-17 May 2019, in Port of Spain, Trinidad and Tobago, with the purpose of expanding FIUs’ operational capacity to perform strategic analysis.
  - Designed for experienced analyst involved in conducting strategic analysis within their FIUs, the course focused on developing skill sets used to detect Terrorist Financing;
  - 18 participants from 16 FIUs attended, including five candidate FIUs: Dominica, Haiti, Guyana, Montserrat and Suriname.

- Regional meeting in The Hague, July 2nd – 3rd 2019: The Americas Regional Group discussed, extensively, the topic of Public-Public Cooperation (PPC). A presentation by FINCEN, USA triggered a fruitful discussion among members regarding how PPCs are addressed in their jurisdictions, the role of the FIU and the identified challenges for protection of information and trust among the parties involved. Americas members also discussed the possibility of having a comprehensive document that could be used as a tool for enhancing PPC in their respective jurisdictions and using the different products the EG already has as a starting point.
The Asia and Pacific Regional Group is comprised of FIUs from member jurisdictions of the Asia and Pacific Group on Money Laundering (APG). During the reporting period, 28 FIUs were members of the Egmont Asia and Pacific Regional Group.

The Asia and Pacific Regional Group was chaired by Mr. Edwin CHOW (JFU, Hong Kong) and Ms. Pranee KAOIAN (AMLO-TH, Thailand). The Asia and Pacific Regional Group will be represented by Mr. Dian Ediana RAE (INTRAC, Indonesia) and Mr. D M RUPASINGHE (FIU-Sri Lanka) for the 2019-2021 period.

REGIONAL GROUP HIGHLIGHTS FROM THE REPORTING PERIOD:

- The 4th CTF Summit was held on 6 to 8 November 2018 in Bangkok Thailand, hosted by the AMLO, Thailand in partnership with AUSTRAC, Australia and INTRAC, Indonesia.
  - The 2018 CTF Summit saw over 350 global leaders and specialists in financial intelligence gather with senior representatives from regulatory, law enforcement, national security and policy agencies, industry participants and academics to consider “Regional Synergies for Regional Solutions.”
  - Outcomes of 2018 CTF Summit included: the identification and prioritisation of ISIL affiliated organisations in the Asia-Pacific region, as well as other emerging terrorist organisations; the launch of a regional assessment on non-profit organisation red flag indicators; and the release of a secure information-sharing platform prototype.

- Regional members participated in several Financial Intelligence Consultative Group (FICG) Working Groups for CTF Summit Initiatives, including:
  - UPWBNM, Malaysia and INTRAC, Indonesia co-leading the FICG’s money laundering work stream to look at regional high-risk money laundering threats with a focus on corruption.

- INTRAC, Indonesia and AMLC, Philippines co-leading the FICG’s private sector work stream to develop guidance on virtual assets.
- AUSTRAC, Australia, UPWBNM, Malaysia and INTRAC, Indonesia collaborating to develop and pilot an Information Sharing Platform to enable enhanced and secured sharing of financial information and intelligence among ASEAN countries, Australia and New Zealand.
- AUSTRAC, Australia and AMLC, Philippines co-chairing the South East Asia Counter Terrorism Working Group to develop a disruption toolkit to assist regional FIUs when considering effective options to disrupt terrorism financing.
- AUSTRAC, Australia hosted seven anti-money laundering/counter-terrorism financing regulators as part of the International Supervisors forum in Melbourne from 14 – 16 November 2018.
- AUSTRAC, Australia delivered financial intelligence and regulatory training to FIUs in the region, including Brunei, Cambodia, Indonesia, Laos PDR, Malaysia, Myanmar, Papua New Guinea, the Philippines, Singapore and Vietnam to harden the region to financial crime. As part of this, AUSTRAC, Australia delivered two regional Financial Intelligence Analyst Courses (FIAC) in 2019, in the Philippines and Singapore.
- AMLD, Taiwan hosted “Egmont Group Securing a Financial Intelligence Unit – Train-the-Trainer Training Course” in December 3-7, 2018. Feedback from participants was ranked as highly satisfactory.
- GIF, Macao hosted the 4th Annual AML/CFT Tripartite Meeting in January 2019 and coordinated about 70 representatives from regulatory, law enforcement and supervisory agencies of 3 jurisdictions (Mainland China, Hong Kong SAR and Macao SAR) to join the meeting.
- UPWBNM, Malaysia, in collaboration with AUSTRAC, Australia delivered a Financial Intelligence (FININT) Workshop in January 2019. The workshop covered tools and techniques for collecting and collating financial data as well as the use of financial analytic tools for identifying ML/TF patterns, trends and risks related to the identified crimes.
- UPWBNM, Malaysia hosted an Analyst Hubbing Exercise in Kuala Lumpur with AUSTRAC, Australia in April/May 2019. Analysts from 11 countries within the region focused on enhancing the spontaneous disclosure of information exchange on unregistered or suspicious remittance activities operating across the region.
- During this reporting period, the Asia and Pacific Regional members signed more than 13 MOUs.
The East and Southern Africa (ESA) Regional Group is made up of FIUs from member jurisdictions of the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG). During this reporting period, the group has grown to 10 FIUs.

During the reporting period, Ms. Fikile ZITHA (FIC, South Africa) was the Regional Representative. Ms. Sandra HALL, (Seychelles-FIU) has been elected as the Regional Representative for the period 2019 – 2021.

**REGIONAL GROUP HIGHLIGHTS FROM THE REPORTING PERIOD:**

- During the reporting period:
  - FIC South Africa signed a MoU with the State of Qatar
  - FIC-Namibia signed an MoU with Iceland
  - TFIU (Tanzania) signed MoUs with the FIUs of the Republics of Sudan, Djibouti, Somalia and the Federal Republic of Ethiopia
  - TFIU, Tanzania participated in various interagency activities on AML/CFT issues with Director of Criminal Investigations, Prevention and Combating of Corruption Bureau, and Tanzania Revenue Authority.
  - TFIU, Tanzania also conducted the following workshops; Awareness of AML/CFT to Peoples Bank of Zanzibar – Unguja, Pemba, Mtwara, Dar Braches, November 2018; goAML Practices to Regulatory and Licensing Authorities, January 2019; goAML awareness to Security Market Intermediaries and Insurance Companies officers, January, 2019; Stakeholders Sensitization on Law, Rules and Procedure of Corruption and Economic Crimes Division, June 2019; Cross Border Declaration of Currency Regulations Training to Customs officials, June 2019; AML/CFT Workshop to judiciary in Zanzibar, January 2019.
  - Seychelles-FIU, supported by the UNODC, hosted a workshop on Proliferation Financing in May 2019.
  - During the reporting period, FIC-Namibia participated in 3 joint analysis/ investigation projects; two which were with domestic and regional partners as well as three joint cases with FIC, South Africa, UIF Angola and the FIU from the Democratic Republic of Congo.
  - FIC-Namibia has also been a lead in the ESAAMLG project on illicit Financial Flows related to wildlife.

- During the reporting period:
  - FIUs from Angola and Zambia participated in the 2019 Best Egmont Case Awards (BECA) by judging submissions.
  - Following the ESAAMLG FIU Forum’s adoption of the Analyst Placement Programme guidelines, ESA members initiated the placement of FIU personnel within other regional FIUs. It is worth noting that while the guidelines were created for analysts, placements have also included IT and Compliance Officers. This is a positive development and should be encouraged.
  - ESA FIUs continue to play a crucial role in coordinating AML/CFT/PF frameworks in the region.
  - ESA is working hard to ensure the 8 remaining non-Egmont members receive continuous support and mentoring from their sponsors and peers alike.
  - During the Hague ESA meeting, a Heads of Analysis Forum (HoAF) was proposed. The HoAF is intended to facilitate and strengthen information exchange amongst ESAAMLG FIUs. A concept note was developed and the 1st meeting is to be held in September 2019.
  - ESA members participated in the ‘Strengthening the Network - FIU and Media Consultation’ organised by the ECOFEL in January 2019.
  - Following the approval of the concept note at the September 2018 ESAAMLG Task Force of Senior Officials Meeting held in Seychelles, a project team comprising representatives from the FIUs of Angola, Mauritius, South Africa and Zambia (project leader), drafted a Questionnaire on Guidelines for producing quality intelligence reports. The Questionnaire was circulated to all ESAAMLG member FIUs in October 2018.
  - FIU representatives from the ESAAMLG region participated in the joint ESAAMLG/FATF Assessors Training held at Mount Meru Hotel in Arusha from 14 to 18 April 2019. The training was partly funded by the GIZ.
  - The ESA Regional Action Plan was adopted at the EC Intersessional meeting in May 2019.
  - A Triilateral Strategy Meeting to counter heroin drug trafficking between South Africa, Mozambique and Tanzania law enforcement agencies was hosted by FIC South Africa from 3-4 July 2019.

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The Eurasia Regional Group is comprised of 7 FIUs from member jurisdictions from the Eurasian Group for Combating Money Laundering and Financing of Terrorism (EAG) and the Commonwealth of Independent States (CIS).

During this reporting period, Mr. Igor ALEKSEEV (FFMS, Russia) served as Regional Representative and was succeeded Mr. Yury KOROTKIY (FFMS, Russia).

REGIONAL GROUP HIGHLIGHTS FROM THE REPORTING PERIOD:

- Three meetings of the Regional HoFIUs were held, two on the margins of EAG plenary meetings (as part of CIS HoFIU meetings in Belarus and Russia respectively) and one on the margins of Egmont 26th Hague Plenary. Topics covered included enhancing members’ contribution to the work of the EG, the new UNSCR 2462/2019, Public-Public Cooperation and the main opportunities and challenges faced by regional FIUs when entering such partnerships. During The Hague meeting, the Eurasia RG approved the Regional Plan (2019 – 2021) and agreed with all proposed next steps.
- Because Eurasia remained a transit zone for illicit drug trafficking and faced ISIL threats by affiliated terrorist groups and foreign terrorist fighters, regional FIUs devoted their efforts to participating in the “Barrier” (counter-terrorism) and the “Channel” (counter-drug trafficking) inter-agency cross-border operations conducted annually. FIUs of Belarus, Kazakhstan, Kyrgyzstan, Russia, Tajikistan and Uzbekistan gave presentations focused on the nexus between organised crime and terrorism at the Joint EAG/APG Typologies Workshop in Novosibirsk, Russia.
- The FIUs of Russia and Belarus participated in several EG Working Groups projects and the 2019 BECA Contest. FFMS, Russia co-led the “Professional Money Laundering Facilitators” and “Typologies on Corruption” projects. A representative of the SFIS, Kyrgyzstan contributed to the new EG Chair selection panel work. The ECOFEL paper on “Understanding FIU Operational Independence and Autonomy” and the Set of Corruption Crimes Indicators were translated into Russian by FFMS, Russia.
- The RR assisted the candidate FMS-Turkmenistan in bringing its legal basis in line with the requirements on information exchange and its admission to the EG at The Hague Plenary Meeting. The CFM, (Kazakhstan) was also supported by the RR by complying with the EG requirements while undergoing a change from an administrative to a hybrid type FIU.
- The videoconference facilities maintained by the ITMCFM (Russian FIU Training Center) were broadly used to deliver training to Eurasia Region FIU personnel and their partners from law enforcement, supervisory, investigative, prosecutorial, judicial and other domestic authorities. Overall, 50-65 participants were brought together.
To assist the members in tracking the former meetings, activities of the region and in preparation for forthcoming regional events, the EGS, in cooperation with the regional representatives, uploaded the regional meetings’ relevant documents (including the agenda and the summary records).

The Egmont Europe I Region discussed the following subjects with regards to the theme of The Hague Plenary, Public-Public Cooperation:

- Asset tracing and securing of assets;
- Money laundering of serious tax crimes;
- Intervening on organised crime at local level and;
- Combating terrorism financing.

The Egmont Europe I Region is comprised of 30 FIUs from member jurisdictions 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 Egmont Europe I Region are FIUs of either the EU member states or the EEA countries.

Throughout this reporting period, the Regional Representatives of Europe I included Mr. Gabor SIMONKA (HFIU, Hungary) and Mr. Francois MAGNAUD (TRACFIN, France). During The Hague Plenary, the Egmont Europe I Region selected two regional representatives with a two-year term mandate (2019 – 2021), Mrs. Hennie VERBEEK-KUSTERS (FIU-Netherlands) and Ms. Lucie CASTETS (TRACFIN, France).

REGIONAL GROUP HIGHLIGHTS FROM THE REPORTING PERIOD:

During the reporting period, the Europe I Region held meetings in Jakarta, Brussels and The Hague. The following topics were covered during these regional meetings:

- The Egmont Europe I Region adopted its Regional Plan for 2018-2021 which guides the implementation of the Egmont Strategic Plan at the regional level.
- The dynamic developments of the EU activities and legislation triggered discussions on subjects impacting the work of FIUs in the Egmont Europe I Region. These subjects were as follows:
  - 5th AML/CFT Directive;
  - Implementation of cash control regulation;
  - Directive on laying down rules facilitating the use of financial information;
  - The assessment of the European Commission on FIU-FIU cooperation and;
  - Issues related to FIU.Net.
The Europe II Regional Group is comprised of 22 FIUs from jurisdictions included in MONEYVAL and the FATF.

In 2019, following the abolition of APMLTF, the FIU of Montenegro, and the creation of a new FIU within the local police, APMLTF, Montenegro ceased to be an EG member. Once the new FIU Montenegro submits its official membership application, the Europe II Regional Group will assist the FIU with the admission process to the extent allowed by the EG procedures.

Throughout this reporting period, the Europe II Regional Representatives were, Mr. Daniel THELESKLAF (EFFI, Liechtenstein) and Mrs. Lindsey BERINGHAM (FIU-IOM, Isle of Man). During the meeting in The Hague, the EUROPE II Regional Group selected two Regional Representatives for two-year terms (2019 – 2021), Mr. Daniel THELESKLAF (MROS, Switzerland) and Mr. Philippe BOISBOUVIER (SICCFIN, Monaco).

REGIONAL GROUP HIGHLIGHTS FROM THE REPORTING PERIOD:

During the December 2018 MONEYVAL Plenary meeting in Strasbourg, France, a Regional Group Meeting was held concurrently. Throughout the meetings, two Europe I FIU representatives, from Estonia and the Czech Republic respectively, presented their experiences with the usage of the local bank account data retrieval system and bank account registration. Additionally, during the meeting, the Regional Group discussed ECOFEL’s publication on FIU Self-Assessment Checklist Annex C – Understanding FIU Operational Independence and Autonomy. Updates were also provided on the efforts to produce a methodology for conducting strategic analysis for the laundering of proceeds of corruption. Finally, Europe II approved the Regional Plan (2018 – 2021) and agreed with all proposed next steps.
The Middle East and Northern Africa Regional Group is comprised of 14 FIUs from jurisdictions included in the Middle East and Northern Africa Financial Action Task Force (MENAFATF).

During this reporting period, the Middle East and Northern Africa (MENA) was represented by Regional Representative, Mr. Abdul Hafiz MANSOUR (SIC, Lebanon) and incoming Representative, Mr. Ghazi AL ABDULJALIL (KwFIU, Kuwait).

The latest EG Regional Group addition was FFU, Palestine which was admitted during the 26th Egmont Group Plenary in The Hague, Netherlands.

REGIONAL GROUP HIGHLIGHTS FROM THE REPORTING PERIOD:

- Three meetings of the Regional HoFIUs were held: two taking place during MENAFATF meetings (one in Lebanon and one in Jordan) and one during the Egmont 26th Plenary in The Hague. Topics covered included translation of EG documents to Arabic, the new UNSCR 2462/2019 and enhancing members’ contribution to the work of the Egmont Group.

- The MENA Regional Action Plan 2018-2021, which highlights the region’s initiatives and priorities in accordance with the EG Strategic Plan, was approved by the MENA Region on the 24th of November 2018 and endorsed by the EC in Jakarta in January 2019.

- A three-day training course on Corporate Vehicles and Financial Products (CorFin) was organised by the TATWG and hosted by SAFIU, Saudi Arabia in Riyadh, Saudi Arabia. The course was attended by EG members and non-Egmont member FIUs from the MENA region.

- The ECOFEL paper on “Understanding FIU Operational Independence and Autonomy” was translated into Arabic by EMLCU, Egypt.

- Several FIUs actively participated in EG Working Groups projects and initiatives, including the PPWG Trigger 4 Limited Statistical Review Project which was led by SIC, Lebanon, and FIU-IOM, Isle of Man.

FIUs in the Middle East and Northern Africa Regional Group were active in sponsoring non-member FIUs in the EG membership process and several FIUs reached advanced levels in the process. UTRF, Morocco and AMLCTFU, Jordan completed the onsite mission to FFU, Palestine in preparation for its EG membership application.
The West and Central Africa region is made up of jurisdictions that are 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 this reporting period, West and Central Africa was represented by Regional Representative, Mr. Hubert SAMBONE (NAFI, Cameroon) and incoming Representative, Ms. Ramatoulaye GADIO AGNE (CENTIF, Senegal).

**REGIONAL GROUP HIGHLIGHTS FROM THE REPORTING PERIOD:**

To strengthen its relationships with stakeholders, FIUs in the region participated in several training programs or activities:

- From March 14 to 16 and March 19 to 23, 2018, the West African FIUs took part, in Saly Portudal (Senegal) in two consecutive workshops, co-organised by GIABA and FATF on the effective implementation of AML/CFT requirements (training on FATF Standards).
- From October 31 to November 02, 2018, CENTIF, Senegal participated in the African Conference on beneficial ownership with the theme “Revealing the beneficial owners of businesses in Africa.” The conference organised by the National Committee of the Initiative for Transparency in the Extractive Industries (CN-EITI).
- On November 22, 2018, CENTIF, Senegal took part in the 2017 CN-EITI report dissemination workshop, held at the King Fahd Palace hotel in Dakar (Senegal).
- From 19 to 21 February 2019, UNODC organised, with CENTIF-Mali, a training session on the physical transport of cash by “cash couriers” for Customs, Gendarmerie, National Police, Taxes and the Office of the Auditor General, in Bamako (Mali).
- From March 11 to 30, 2019, CENTIF-Mali and the National Institute of Judicial Training (INFJ) of Mali jointly organised, with GIABA, a three-week training workshop on building the capacities of magistrates, Judicial Police, Customs, Water and Forest officers in charge of investigations and prosecutions in the fight against Money Laundering, Terrorism Financing and the Proliferation of Weapons of Mass Destruction (LBC/ FT/PWMD).
- From 20 to 21 March 2019, CENTIF-Mali took part in the Round Table organised by GIABA and GABAC on FIUs independence and autonomy in Libreville (Gabon).
- From April 23 to 24, 2019, the regional FIUs participated in the meeting of EG French speaking FIU Circle which took place in Dakar (Senegal).

**OTHER REGIONAL DEVELOPMENTS INCLUDE:**

- Interconnection between CENTIF-Benin and the following National Administrations: Taxes, Customs, Public Treasury and Interpol.
- Signing of two MOU by the CENTIF-Benin with national institutions, Agency for the Promotion of Investments and Exports (APIEX) and Interpol Central National Bureau of Cotonou.
- Mali Mutual Evaluation: Work on the country’s second cycle of mutual evaluations continued during this reporting period. A team of experts made up of four members of the GIABA Secretariat and five Expert Evaluators from GIABA Member States, paid a so-called “site visit” to Bamako from March 4 to 15, 2019.
- Cooperation agreements were signed between:
  - CENTIF-Benin and the FIUs of Luxembourg, Congo, Equatorial Guinea, Monaco and Gambia
  - CENTIF, Senegal and the FIUs of Equatorial Guinea, Comoros and Gambia
Chapter 8

Best Egmont Case Award
I. INTRODUCTION

This case relates to a former senior official of one of Peru’s most important state-owned enterprise who was a PEP at the time of the events.

The PEP allegedly received bribes from a Latin American transnational company through financial transactions to his account by ways of an offshore company that the PEP set up just over a month before receiving said funds. The capitals were transferred to different accounts in four (04) countries. These accounts belonged to the PEP’s immediate family or to companies linked to them (conversion and transfer acts). The funds were used for the acquisition of real estate (acts of concealment and possession).

The PEP tried to justify the illicit funds by simulating a property sale to the Latin American transnational company that allegedly paid the bribes. The simulation was discarded with the verifications made during the investigation of the case, since it was proven that the property did not belong to the PEP nor was it under his possession, and that the contract did not have the signatures of all parties involved.

Additionally, funds of unknown origin that came from abroad and entered Peru were detected, which later followed the same modality and destination as the funds that have allegedly come from bribes.

II. ANALYSIS

The case began as a result of a news report that indicated that the aforementioned PEP had received a bribe from a transnational construction company of approximately USD 1,300,000 through an account in Country “A.”

Taking as a starting point the information stated above, further information was requested from our counterparts in Country “A” and Country “B.”

Once received, the information allowed us to identify the first links between those involved in the case and the initial money route, detecting that the money had allegedly gone to Country “B,” Country “C,” and Country “D” and that it was being mostly transferred to accounts belonging to the PEP’s immediate family and to offshore companies owned by them. In addition, it was identified that Offshore 1, which received the bribes, had been established in Country “B” and that Offshore 3 and Offshore 4 had been established in Country “E.”

With the information obtained from Country “A,” further information was requested from our counterparts in Country “B,” Country “C,” Country “D,” Country “E,” and Country “F” and from BL 1 (Peruvian bank), seeking to identify the links between those involved and the destination of the funds that allegedly came from the payment of bribes. Similarly, information was requested from the main Peruvian banks as well as from open data sources and internal databases for the same purpose. This allowed for the economic activity and assets of the investigated PEP and his affiliates to be identified, and the rationality of the funds to be evaluated.

It was identified that the money came mostly to Peru and was used to acquire real estate and vehicles. However, one of the properties was also located in Country “G,” which prompted a request of information to said country in order to identify who uses the property and inquire about other properties that those involved could have had in Country “G.” Furthermore, it was identified that Offshore 3 belonged to the PEP and his wife, and that Offshore 4 belonged to a Uruguayan citizen and his wife, the former having worked in the same economic sector as the PEP.

CHART NO. 1: MONEY FLOW THAT ALLEGEDLY CAME FROM THE PAYMENT OF BRIBES
With the information obtained from BL 1, approximately USD 3,980,000 of unknown origin were identified. These funds were transferred to local accounts owned by the PEP’s immediate family and used for the acquisition of real estate and vehicles in the names of the members of that family. In addition, these funds were also used to finance a candidate’s campaign to the Andean Parliament.

**CASE CLOSURE**

In this case, the following typologies were used:

- Establishment of Offshore Company to receive alleged bribes.
- Simulation of a private real estate sale contract to justify the receipt of the money transferred by the Latin American transnational company.
- Diversion of funds of unknown origin to finance a candidate’s campaign to the Andean Parliament.
- Transfer of funds to bank accounts mostly owned by members of the PEP’s immediate family and companies under their names.

**III. CONCLUSION**

The information was delivered to the Public Prosecutor’s Office, which has been included in the prosecutor’s money laundering investigation against the PEP and Son 2. In this case, the judge ordered a restrictive measure against the main parties involved, which will prevent the PEP and Son 2 from leaving the country for 12 months.
The key to success for unmasking and undermining the global scheme of terrorist financing using e-wallets (Rosfinmonitoring, Russian Federation)

Introduction

The presented case is an example of the effective international cooperation between FIUs and national cooperation with the LEAs – the participants of the national counter terrorism financing system.

The recent National Risk Assessment identified, as the top priority, terrorist financing risks involving financial transactions carried out without having open bank accounts. Regular use of the e-wallet payment method by terrorist groups result from wide geography, high wiring speed and minimum identification demands which, therefore, complicate the work involved in analysing customers’ interconnections. To reduce this risk, the Federal Financial Monitoring Service (Rosfinmonitoring) pays exceptional attention to monitoring financial transactions using e-wallets.

The joint investigation resulted in the identification of the TF international channels and subsequent criminal activity suppression.

The case was successfully finalised within 3.5 months from the time the information request was filed with Rosfinmonitoring by a foreign FIU.

Evolution of Case

INITIAL DETECTION

This case was trigged by the information request received from a foreign partner, Tajikistan’s Financial Monitoring Department (FMD), in January 2017. Based on the information acquired, this FIU suspected 4 (four) e-wallets as being related to ISIL financing. The only available and provided data was the e-wallets’ no-name numbers (+7-XXX-XX-XX…).

Stage 1. Initial data acquired.

Rosfinmonitoring started immediately with identifying the funds’ sources and further cash flows via the e-wallets. In a few days, Rosfinmonitoring urged the relevant credit institution to provide the data. The check identified that from April to July 2016 the unknown individuals in Russia, through the self-service payment terminals, regularly credited the e-wallets in small amounts of cash. The total incoming cash flow was 230,000 RUR (≈USD 3,500).
Stage 2 of the data collection. Incoming flow.

ROLE OF THE FIU AND ANALYSIS
Rosfinmonitoring scrutinised debit transactions and identified that the main flow of money was via the bankcards of the Russian citizen “Subject A” and of 3 (three) foreigners “Subject B,” “Subject C” and “Subject D.”

Stage 3 of the data collection. Outgoing flow.

With the prior consent of the requesting foreign FIU, Rosfinmonitoring continued the investigation in cooperation with the Russian law enforcement agencies (LEAs). The acquired operational data determined that the subjects had been already suspected of terrorist-activity financing.
NATIONAL AND INTERNATIONAL COOPERATION

In February 2017, domestic cooperation with the Russian LEAs led to the identification of affiliated persons from the inner circle of the listed-in-future subjects, the subjects themselves and other operational information on the checked individuals.

Based on the intelligence received, among the counterparts of “Subject A” and “Subject D,” the FIU of Russia revealed an individual who was later (in 2017) listed for committing an act of terror, participation in one of the international terrorist organisations (ITO) and terrorist activity propaganda. In June 2016, the person credited “Subject A’s” account with 10,000 RUR and “Subject D’s” account with 7,000 RUR.

At the same time, “Subject D” wired 20,000 RUR to the sister of another listed individual, currently wanted for his participation in the ITO.

Stage 4 results. National level cooperation with the Listed and wanted fighters identified.

The financial and LEA intelligence was urgently forwarded to the requesting FIU.

In March 2017, the requesting FIU enriched the intelligence held by Rosfinmonitoring and identified that the owner of the bankcard credited from the e-wallets was “Subject B,” an ISIL member fighting in the Syrian Arabic Republic.

Further bilateral analysis of “Subject A’s” private connections revealed an individual wanted by both countries under Criminal Code charges relating to the formation of an organised criminal group (OCG) and an extremist group as well as illegal arms trafficking. In June 2016, the “Subject A” transferred 5,000 RUR to this wanted person.

The accounts’ cash flow review outlined another contact of “Subject B.” In October 2016, the contact wire-transferred about 30,000 RUR to “Subject B” through two (2) separate transactions. At the time of the case investigation, the individual was already Listed and wanted for the participation in the combat in Syria.

Transfer of information to law enforcement agencies or arrest during the investigation

An in-depth joint national investigation of the “Subject C’s” bank accounts statements revealed:
Stage 5 results. Additional intelligence provided to the FIU of Tajikistan. March 2017

- 13 individuals whose assets were already frozen as a result of parallel investigations (after they completed the transactions outlined by this case);
- 11 individuals already included in the List after the initiation of criminal cases under articles relating to terrorist activity as a result of parallel investigations (after they completed the transactions outlined by this case).

This intelligence was forwarded to the partner FIU for their prompt actions.

In April 2017, within the framework of the CIS-countries FIUs’ “Mutual Assets’ Freeze Project,” Subjects “A,” “B,” “C” and “D’s” assets were frozen by the Russian Interagency Committee on Counteracting Terrorism Financing (hereinafter ICCTF) based on sufficient grounds to suspect these Subjects of activities potentially relating to terrorism financing.

Stage 6 results. Assets frozen.

END OF THE CASE

ICCTF’s decision to freeze the assets of the foreign individuals, Subjects “B,” “C” and “D,” was immediately forwarded to the Tajikistani FIU.

The access to the Russian financial system was blocked for all Subjects by forwarding a special notice to all reporting entities. Rosfinmonitoring will get an alert if the Subjects attempt to open a new account in another credit institution.

Based on the intelligence provided by the Russian Federation, the partner FIU initiated criminal cases against Subjects “B” and “D” under articles related to terrorist activity.

The final stage. Overview of the bilateral investigation joint information enrichment.

CONCLUSION

The case benefited from and contributed to the “Mutual freezes” project carried out by Rosfinmonitoring within the Global CFT network.

To ban the illicit use of the financial systems of participating countries, Rosfinmonitoring exchanges the lists of subjects with sufficient grounds to suspect them of terrorist activity with our counterpart FIUs. ICCTF evaluates their adequacy, sufficiency and approves the freezing of the assets.
Chapter 9 | Acknowledgements

HOST FIUs

2018

SEPTEMBER 2018
AUSTRAC, AUSTRALIA
SYDNEY
25th Egmont Group Plenary

2019

JANUARY 2019
INTRAC, INDONESIA
JAKARTA
Egmont Group Working Group and Egmont Committee Meetings

JULY 2019
FIU-NETHERLANDS
THE HAGUE
26th Egmont Group Plenary

MAY 2019
EMLCU (EGYPT)
Hosted EC Intersessional Meeting

For hosting training courses or workshops

AMLD, Taiwan
SAFIU, Saudi Arabia and GIFI, Poland
QFIU, Qatar
FIUTT, Trinidad and Tobago

For authorising staff to be trainers

FINTRAC, Canada
FINCEN, USA
UTRF, Morocco
FIUTT, Trinidad and Tobago
EMLCU, Egypt

DONORS AND CONTRIBUTORS:

FINCEN, USA:
Hosting, maintaining and improving the ESW

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

US State Department and AMLD, Taiwan:
Funding training courses

FFMS, Russia:
Seconding a Senior Officer from December 2017 to December 2021

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

Department for International Development (DFID), UK:
Funding ECOFEL Program

State Secretariat for Economic Affairs SECO, Switzerland:
Funding ECOFEL Program

SAFIU, Saudi Arabia:
Annual donation for a period of 10 years
JAKARTA – The Egmont Group Working Group and Egmont Committee Meetings 2019 took place between 28-31 January in Jakarta, Indonesia. More than 300 participants, representing Egmont Group members, international partners, and observers, gathered for this event hosted by Pusat Pelaporan Dan Analisis Transaksi Keuangan (PPATK)/Indonesian Financial Transaction Reports and Analysis Centre (INTRAC).


In this first meeting since the Egmont Group endorsed a new Strategic Plan (https://egmontgroup.org/en/content/egmont-group-strategic-plan-2018-2021), the Working Groups were provided the opportunity to advance operational projects and form new initiatives that meet the organisation’s four Strategic Objectives:

- Facilitating bilateral and multilateral exchanges of information
- Strengthening FIU capabilities
- Expanding the Group’s field of knowledge
- Developing new partnerships

Equipped with individual mandates and a clear strategic direction the Working Groups addressed several topics, including:

- The identification of new projects focused on building FIU knowledge, effectiveness, and operational capacity.
- Important work to ensure the timely completion of all ongoing projects aimed at enhancing FIU efficiencies and capabilities.
- An analysis of the impediments to bilateral and multilateral exchanges of information between FIUs.
- The development of a glossary of key Egmont Group terminology to help improve the quality of information exchange.
- A review of candidate member applications.
- A look at The Egmont Centre of FIU Excellence and Leadership’s (ECOFEL) avenues of support available to FIUs.

These results will help the Egmont Group achieve its goals, as determined in the Egmont Group Strategic Plan 2019 - 21.

The Egmont Group Committee convened to coordinate plans for upcoming meetings and to discuss matters of importance to all the Group’s regions and Working Groups.

The Egmont Group Working Groups meet periodically, with the next meeting scheduled for July 2019. All members of the Egmont Group of Financial Intelligence Units are grateful to INTRAC for hosting the Working Group Meetings 2019. The Egmont Group acknowledges INTRAC’s long-standing commitment and contribution to regional and international anti-money laundering and counter terrorism financing efforts.

Ends

BACKGROUND

The Egmont Group is comprised of 159 Financial Intelligence Units. It provides a platform for the secure exchange of expertise and financial intelligence on combating money laundering and terrorist financing. FIUs are uniquely positioned to cooperate and support national and international efforts to counter terrorist financing and are the trusted gateway for sharing financial information domestically and internationally in accordance with global AML/CFT standards.

For more information about the Egmont Group’s Working Groups: https://egmontgroup.org/en/content/working-groups-and-programs

Further information about the can be found at www.egmontgroup.org
ANNEX B: THE HAGUE CO-CHAIRS STATEMENT

Co-Chairs’ Statement 26th Plenary of the Egmont Group of Financial Intelligence Units

The UN Secretary-General’s Special Advocate for Inclusive Finance for Development (UNSGSA), her Majesty Queen Máxima of the Netherlands, opened the plenary meeting alongside the Dutch Minister of Justice and Security, Mr. Ferdinand Grapperhaus. Both reflected on the crucial role FIUs play in an effort to protect global financial stability, and the necessity of public-public collaboration in the AML/CFT environment, as well as the importance of financial inclusion as a key factor in the prevention of ML/TF risks. In her speech, the UNSGSA emphasized that financial inclusion, financial integrity and financial stability are not just complementary but also mutually reinforce each other.

The Head of FIU - the Netherlands and Egmont Group Chair, Mrs. Hennie Verbeek-Kusters, led the 26th Egmont Group Plenary alongside the newly elected Egmont Group Chair, Mr. Mariano Federici, President of UIF Argentina.

The plenary concluded on ways in which FIUs can engage in Public-Public Cooperation (PPC) that will lead to better identifying, understanding and tackling money laundering, its predicate offences and terrorist financing. The plenary looked at innovative examples of PPC, considering the challenges and opportunities. The main conclusions are:

- PPC is essential to success in the AML/CFT domain;
- access of FIUs to data systems/databases is key;
- there is always a trade-off between data protection, privacy and security;
- confidentiality of information shared must be guaranteed and results count;
- respecting the unique mandate of each party in a PPC is imperative;
- trust and cultural understanding are crucial.

A compendium outlining the examples and conclusions will be published following the plenary meeting. It will help FIUs entering in and starting PPC.

The Egmont Group now boasts 164 members following the endorsement of FIUs from Dominican Republic, Ethiopia, Palestine, Papua New Guinea, Turkmenistan, and Uganda. The Heads of FIU (HoFIU) also lifted the suspension on UIF El Salvador.

An FIU’s admission to the Egmont Group does not imply recognition of any country or territory and should not be used as a tool for any political purpose.

Other highlights from the 26th Egmont Group Plenary:

- The Egmont Group will publish four completed operational projects. These publications address: tools and practices as well as indicators for the identification of the laundering of the proceeds of corruption; how to detect and process cases related to TF activities of small cells and lone actors; red flags and indicators for the private sector as well as insights to general business model of professional money laundering networks; and indicators, schemes, scenarios on business email compromise (CEO) fraud.
- UIF-Peru was voted winner of the 2019 Best Egmont Case Award (BECA), with a case that uncovered an international ring of corruption that involved multiple Politically Exposed Persons (PEPs), with a strong emphasis on financial intelligence exchange. This FIU case was also recognised by the World Bank-UNODC Stolen Asset Recovery Initiative (StAR).

The Egmont Group would like to warmly thank FIU – the Netherlands for hosting the plenary meeting. The 26th Egmont Group Plenary meeting brought together 497 participants, the Group’s largest plenary meeting to date.

The Hague, the Netherlands 5 July 2019

Further information about the Egmont Group can be found at www.egmontgroup.org
### ANNEX C: LIST OF MEMBERS

1. FinTRAC, Afghanistan
2. GDPLML, Albania
3. CTRF, Algeria
4. UIFAND, Andorra
5. UIF-ANGOLA, Angola
6. MLRA, Anguilla
7. ONDPC, Antigua and Barbuda
8. UIF-AR, Argentina
9. FMC, Armenia
10. MOT, Aruba
11. AUSTRAC, Australia
12. A-FIU, Austria
13. FMS-AZ, Azerbaijan
14. FIU-BS, Bahamas
15. FID, Bahrain
16. BFIU, Bangladesh
17. AMLA, Barbados
18. DFM, Belarus
19. CTIF-CRI, Belgium
20. FIU-BZ, Belize
21. CENTIF-BENIN, Benin
22. FIADBA, Bermuda
23. UIF-BOLIVIA, Bolivia
24. FID, Bosnia and Herzegovina
25. COAF, Brazil
26. FIA-VG, British Virgin Islands
27. UPK, Brunei Darussalam
28. FID-SANS, Bulgaria
29. CENTIF-BF, Burkina Faso
30. CAFIU, Cambodia
31. NAFI, Cameroon
32. FINTRAC, Canada
33. UIF-Cape-Verde, Cape Verde
34. FRA, Cayman Islands
35. ANIF-TCHAD, Chad
36. UAF-CL, Chile
37. UIAF, Colombia
38. ANIF-Congo, Congo Brazzaville
39. CIFIU, Cook Islands
40. ICD, Costa Rica
41. CENTIF-CI, Côte d'Ivoire
42. FIU Croatia, Croatia
43. DGIOF, Cuba
44. FIU Curaçao, Curaçao
45. MOKAS, Cyprus
46. FAU, Czech Republic
47. HVIDVASK, Denmark
48. FIU-DOM, Dominica
49. UAF-DomRep, Dominican Republic
50. UAFE-Ecuador, Ecuador
51. EMLCU, Egypt
52. UIF, El Salvador
53. Estonian FIU, Estonia
54. EFIC, Ethiopia
55. FIJI-FIU, Fiji
56. RAP, Finland
57. TRACFIN, France
58. NAFI-GABON, Gabon
59. FMS, Georgia
60. FIU, Germany
61. FIC-Ghana, Ghana
62. GFIU, Gibraltar
63. Hellenic FIU, Greece
64. FIU-GD, Grenada
65. IVE, Guatemala
66. FIS, Guernsey
67. AIF, HOLY SEE (Vatican City State)
68. UIF-HN, Honduras
69. JFRIU, Hong Kong
70. HFIU, Hungary
71. HERSAK, Iceland
72. FIU-IND, India
73. INTRAC, Indonesia
74. FIU, Ireland
75. FIU-IOM, Isle of Man
76. IMPA, Israel
77. UIF, Italy
78. FID-JAMAICA, Jamaica
79. JAFIC, Japan
80. JFCU, Jersey
81. AMLCTFU, Jordan
82. CFM, Kazakhstan
83. KoFIU, South Korea
84. NJIF-K, Kosovo
85. KwFIU, Kuwait
86. SFIS, Kyrgyzstan
87. FID, Latvia
88. SIC, Lebanon
89. EFFI, Liechtenstein
90. FCSI, Lithuania
91. CRF, Luxembourg
92. GIF, Macao
93. FIO, Macedonia
94. FIU-MALAWI, Malawi
95. UPWBNM, Malaysia
96. CENTIF-MALI, Mali
97. FAU, Malta
98. RMI-FIU, Marshall Islands
99. FIU-MU, Mauritius
100. FIU-MEXICO, Mexico
101. SPCSB, Moldova
102. SICCFIN, Monaco
103. FIU-MONGOLIA, Mongolia
104. APMLTF, Montenegro\(^2\) – abolished
105. UTRF, Morocco
106. FIC-Namibia, Namibia
107. FIU-Nepal, Nepal
108. FIU-Netherlands, Netherlands
109. FIU-NZ, New Zealand
110. CENTIF-NIGER, Niger
111. FIU-NG, Nigeria
112. FIU-NUI, Niue
113. EFE, Norway
114. FFU, Palestine
115. UAF-PA, Panama
116. FASU, Papua New Guinea
117. FIU-PY, Paraguay
118. UIF-PERU, Peru
119. AMLC, Philippines
120. GIF, Poland
121. UIF-PORTUGAL, Portugal
122. QFIU, Qatar
123. ONPCSB, Romania
124. FFMS, Russia
125. FIU-KN, Saint Kitts and Nevis
126. FIA, Saint Lucia
127. FIU-VC, Saint Vincent and the Grenadines
128. SFIU, Samoa
129. FIA, San Marino
130. SAFIU, Saudi Arabia
131. CENTIF, Senegal
132. APML, Serbia
133. Seychelles-FIU, Seychelles
134. STRO, Singapore
135. MOT-SM, Sint Maarten
136. FSJ NAKA PZ, Slovakia
137. OMLP, Slovenia
138. SIFIU, Solomon Islands
139. FIC, South Africa
140. SEPBLAC, Spain
141. FIU-Sri Lanka, Sri Lanka
142. FIUSU, Sudan
143. FIU, Sweden
144. MROS, Switzerland
145. CMLC, Syria
146. AMLD, Taiwan
147. FMD, Tajikistan
148. FTU, Tanzania
149. AMLO-TH, Thailand
150. CENTIF-TOGO, Togo
151. FIUTT, Trinidad and Tobago
152. CTAF, Tunisia
153. MASA, Turkey
154. FMS-Turkmenistan, Turkmenistan
155. FIA-TCI, Turks and Caicos
156. Uganda-FTI, Uganda
157. SFMS, Ukraine
158. UAE FIU, United Arab Emirates
159. UKFIU, United Kingdom
160. FINCEN, United States of America
161. UIAF, Uruguay
162. FIU-UZBEKISTAN, Uzbekistan
163. FIU-VU, Vanuatu
164. UNIF, Venezuela
165. FIC-Zambia, Zambia

\(^2\) In 2019, following the abolition of APMLTF, the FIU of Montenegro, and the creation of a new FIU within the local police, APMLTF, Montenegro ceased to be an EG member.
## ANNEX D: EGMONT COMMITTEE COMPOSITION

### PRIOR TO THE HAGUE:

<table>
<thead>
<tr>
<th>NAME</th>
<th>POSITION</th>
<th>FIU</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mrs. Hennie VERBEEK-KUSTERS</td>
<td>Chair, Egmont Group of Financial Intelligence Units</td>
<td>FIU-Netherlands</td>
</tr>
<tr>
<td>Mr. Abdul Hafiz MANSOUR</td>
<td>Vice-Chair, Egmont Group and Regional Representative, Middle East and Northern Africa Region</td>
<td>SIC, Lebanon</td>
</tr>
<tr>
<td>Mr. Mariano FEDERICI</td>
<td>Vice-Chair, Egmont Group and Regional Representative, Americas Region</td>
<td>UIF-AR, Argentina</td>
</tr>
<tr>
<td>Mr. Jérôme BEAUMONT</td>
<td>Executive Secretary, Egmont Group of Financial Intelligence Units</td>
<td></td>
</tr>
<tr>
<td>Ms. Bess Johnson MICHAEL</td>
<td>ESW Representative</td>
<td>FINCEN, USA</td>
</tr>
<tr>
<td>Mr. Marko STOLLE</td>
<td>Chair, Information Exchange Working Group (IEWG)</td>
<td>FIU, Germany</td>
</tr>
<tr>
<td>Mrs. Silvina RIVAROLA</td>
<td>Acting Chair, Membership, Support, and Compliance Working Group (MSCWG)</td>
<td>UIF-AR, Argentina</td>
</tr>
<tr>
<td>Ms. Anne Mette WADMAN</td>
<td>Chair, Policy and Procedures Working Group (PPWG)</td>
<td>EFE, Norway</td>
</tr>
<tr>
<td>Mr. Amr RASHED</td>
<td>Chair, Technical Assistance and Training Working Group (TATWG)</td>
<td>EMLCU, Egypt</td>
</tr>
<tr>
<td>Mr. Luc BEAUDRY</td>
<td>Regional Representative, Americas Regional Group</td>
<td>FINTRAC, Canada</td>
</tr>
<tr>
<td>Mr. Edwin CHOW (Chi Kwan (Edwin) CHOW)</td>
<td>Regional Representative, Asia and Pacific Regional Group</td>
<td>JFIU, Hong Kong</td>
</tr>
<tr>
<td>Ms. Pranee KAOIAN</td>
<td>Regional Representative, Asia and Pacific Regional Group</td>
<td>AMLO, Thailand</td>
</tr>
<tr>
<td>Ms. Fikile ZITHA</td>
<td>Regional Representative, East and Southern Africa Regional Group</td>
<td>FIC, South Africa</td>
</tr>
<tr>
<td>Mr. Igor ALEKSEEV</td>
<td>Regional Representative, Eurasia Regional Group</td>
<td>FFMS, Russia</td>
</tr>
<tr>
<td>Mr. Gabor SIMONKA</td>
<td>Regional Representative, Europe I Regional Group</td>
<td>HFIU, Hungary</td>
</tr>
<tr>
<td>Mr. Francois MAGNAUD</td>
<td>Regional Representative, Europe I Regional Group</td>
<td>TRACFIN, France</td>
</tr>
<tr>
<td>Mr. Daniel THELESKLAF</td>
<td>Regional Representative, Europe II Regional Group</td>
<td>EFFI, Liechtenstein</td>
</tr>
<tr>
<td>Mrs. Lindsey BERMINGHAM</td>
<td>Regional Representative, Europe II Regional Group</td>
<td>FIU-HOM, Isle of Man</td>
</tr>
<tr>
<td>Mr. Hubert SAMBONE</td>
<td>Regional Representative, West and Central Africa Regional Group</td>
<td>NAFI, Cameroon</td>
</tr>
<tr>
<td>NAME</td>
<td>POSITION</td>
<td>FIU</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>---------------------------------------------------------------------------</td>
<td>----------------------------------</td>
</tr>
<tr>
<td>Mr. Mariano FEDERICI³</td>
<td>Chair, Egmont Group of Financial Intelligence Units</td>
<td>UIF-AR, Argentina</td>
</tr>
<tr>
<td>Ms. Ramatoulaye GADIO AGNE</td>
<td>Vice-Chair, Egmont Group and Regional Representative, West and Central</td>
<td>CENTIF, Senegal</td>
</tr>
<tr>
<td>Mr. Daniel THELESKLAF</td>
<td>Chair, Information Exchange Working Group (IEWG)</td>
<td>FIU, Germany</td>
</tr>
<tr>
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<tr>
<td>Mr. Amr RASHED</td>
<td>Chair, Technical Assistance and Training Working Group (TATWG)</td>
<td>EMLCU, Egypt</td>
</tr>
<tr>
<td>Mrs. Anne-Marie KEMNA</td>
<td>Regional Representative, Americas Regional Group</td>
<td>FIU-Curaçao</td>
</tr>
<tr>
<td>Mr. Sergio ESPINOSA</td>
<td>Regional Representative, Americas Regional Group</td>
<td>UIF-Peru</td>
</tr>
<tr>
<td>Mr. D N RUPASINGHE</td>
<td>Regional Representative, Asia and Pacific Regional Group</td>
<td>INTRAC, Indonesia</td>
</tr>
<tr>
<td>Ms. Sandra HALL</td>
<td>Regional Representative, East and Southern Africa Regional Group</td>
<td>Seychelles-FIU</td>
</tr>
<tr>
<td>Mr. Yury KOROTKIY</td>
<td>Regional Representative, Eurasia Regional Group</td>
<td>FFMS, Russia</td>
</tr>
<tr>
<td>Mrs. Hennie VERBEEK-KUSTERS</td>
<td>Regional Representative, Europe I Regional Group (Interim Chair of the</td>
<td>FIU-Netherlands</td>
</tr>
<tr>
<td>Mr. Philippe BOISBOUVIER⁴</td>
<td>Regional Representative, Europe II Regional Group</td>
<td>SiCCFin, Monaco</td>
</tr>
<tr>
<td>Mr. Ghazi AL ABDUL JALIL</td>
<td>Regional Representative, Middle East and Northern Africa Regional Group</td>
<td>KwFiU, Kuwait</td>
</tr>
</tbody>
</table>

³ Until January 26th, 2020 wherein Mrs. Hennie Verbeek-Kusters assumed the role of Interim Chair of the Egmont Group.
⁴ Shortly after the conclusion of this reporting period, Ms. Oxana GISCA (SPCSB, Moldova) stepped in as Regional Representative for the Europe II region.
## ANNEX E: GLOSSARY OF TERMS

<table>
<thead>
<tr>
<th>Term</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>A-SAC</td>
<td>Advanced Strategic Analysis Course</td>
</tr>
<tr>
<td>AML</td>
<td>Anti-Money Laundering</td>
</tr>
<tr>
<td>APG</td>
<td>Asia Pacific Group on Money Laundering</td>
</tr>
<tr>
<td>BEC</td>
<td>Business Email Compromise</td>
</tr>
<tr>
<td>BECA</td>
<td>Best Egmont Case Award</td>
</tr>
<tr>
<td>CFATF</td>
<td>Caribbean Financial Action Task Force</td>
</tr>
<tr>
<td>CFT</td>
<td>Counter Financing of Terrorism</td>
</tr>
<tr>
<td>CorFin</td>
<td>Corporate Vehicles and Financial Products</td>
</tr>
<tr>
<td>CSAE</td>
<td>Child sexual abuse and exploitation</td>
</tr>
<tr>
<td>CT</td>
<td>Counter Terrorism</td>
</tr>
<tr>
<td>CTF</td>
<td>Counter-Terrorism Financing</td>
</tr>
<tr>
<td>DFID</td>
<td>Department for International Development (United Kingdom)</td>
</tr>
<tr>
<td>EAG</td>
<td>Eurasian Group on Combating Money Laundering and Financing of Terrorism</td>
</tr>
<tr>
<td>EBC</td>
<td>Egmont Biennial Census</td>
</tr>
<tr>
<td>EC</td>
<td>Egmont Committee</td>
</tr>
<tr>
<td>ECOFEL</td>
<td>Egmont Centre of FIU Excellence and Leadership</td>
</tr>
<tr>
<td>EG</td>
<td>Egmont Group</td>
</tr>
<tr>
<td>EGS</td>
<td>Egmont Group Secretariat</td>
</tr>
<tr>
<td>EPT</td>
<td>ECOFEL Program Team</td>
</tr>
<tr>
<td>ESAAMLG</td>
<td>Eastern and Southern Africa Anti-Money Laundering Group</td>
</tr>
<tr>
<td>ESW</td>
<td>Egmont Secure Web</td>
</tr>
<tr>
<td>EU</td>
<td>European Union</td>
</tr>
<tr>
<td>FATF</td>
<td>Financial Action Task Force</td>
</tr>
<tr>
<td>FIAC</td>
<td>Financial Intelligence Analyst Course</td>
</tr>
<tr>
<td>FICG</td>
<td>Financial Intelligence Consultative Group</td>
</tr>
<tr>
<td>FIU</td>
<td>Financial Intelligence Unit</td>
</tr>
<tr>
<td>FIWF</td>
<td>ECOFEL and UNODC’s Financial Investigations (Financial Flows) in Wildlife and Forestry Crime project</td>
</tr>
<tr>
<td>FSRB</td>
<td>FATF-Style Regional Bodies</td>
</tr>
<tr>
<td>FTF</td>
<td>Foreign Terrorist Fighter</td>
</tr>
<tr>
<td>GABAC</td>
<td>Task Force on Money Laundering in Central Africa</td>
</tr>
<tr>
<td>GAFILAT</td>
<td>Financial Action Task Force of Latin America</td>
</tr>
<tr>
<td>GIABA</td>
<td>Inter-Governmental Action Group against Money Laundering in West Africa</td>
</tr>
<tr>
<td>GIZ</td>
<td>Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH</td>
</tr>
<tr>
<td>HoFIU</td>
<td>Heads of Financial Intelligence Units</td>
</tr>
<tr>
<td>IEWG</td>
<td>Information Exchange Working Group</td>
</tr>
<tr>
<td>ISIL</td>
<td>Islamic State of Iraq and the Levant</td>
</tr>
<tr>
<td>ISP</td>
<td>Information-Sharing Platform</td>
</tr>
<tr>
<td>IT</td>
<td>Information Technology</td>
</tr>
<tr>
<td>LEA</td>
<td>Law Enforcement Authority</td>
</tr>
<tr>
<td>ME</td>
<td>Mutual Evaluation</td>
</tr>
<tr>
<td>MENA</td>
<td>Middle East and Northern Africa</td>
</tr>
<tr>
<td>MENAFATF</td>
<td>Middle East and Northern Africa Financial Action Task Force</td>
</tr>
<tr>
<td>ML</td>
<td>Money Laundering</td>
</tr>
<tr>
<td>MONEYVAL</td>
<td>Council of Europe Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism</td>
</tr>
<tr>
<td>MoU</td>
<td>Memorandum of Understanding</td>
</tr>
<tr>
<td>MSCWG</td>
<td>Membership, Support, and Compliance Working Group</td>
</tr>
<tr>
<td>OAC</td>
<td>Operational Analysis Course</td>
</tr>
<tr>
<td>PPWG</td>
<td>Policy and Procedures Working Group</td>
</tr>
<tr>
<td>SAM</td>
<td>Heads of FIU Support and Assistance Mechanism</td>
</tr>
<tr>
<td>SAR</td>
<td>Suspicious Activity Report</td>
</tr>
<tr>
<td>SEC-FIU</td>
<td>Securing an FIU</td>
</tr>
<tr>
<td>StAR</td>
<td>World Bank’s Stolen Asset Recovery Initiative</td>
</tr>
<tr>
<td>STR</td>
<td>Suspicious Transaction Report</td>
</tr>
<tr>
<td>TATWG</td>
<td>Technical Assistance and Training Working Group</td>
</tr>
<tr>
<td>TF</td>
<td>Terrorist Financing</td>
</tr>
<tr>
<td>UAR</td>
<td>Unusual Activity Report</td>
</tr>
<tr>
<td>UNODC</td>
<td>United Nations Office on Drugs and Crime</td>
</tr>
<tr>
<td>VASPs</td>
<td>Virtual Asset Service Provider</td>
</tr>
</tbody>
</table>
## ANNEX F: OBSERVER AND INTERNATIONAL PARTNER ASSOCIATED WEBSITES

### OBSERVER

<table>
<thead>
<tr>
<th>Organization</th>
<th>Website</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asia Pacific Group on Money Laundering (APG)</td>
<td><a href="http://www.apgml.org">www.apgml.org</a></td>
</tr>
<tr>
<td>Common Market for Eastern and Southern Africa (COMESA)</td>
<td><a href="http://www.comesa.int">www.comesa.int</a></td>
</tr>
<tr>
<td>Cooperation Council for The Arab States of The Gulf (GCC)</td>
<td><a href="http://www.gcc">www.gcc</a> sg.org</td>
</tr>
<tr>
<td>Eurasian Group on Combating Money Laundering and Financing Terrorism (EAG)</td>
<td><a href="http://www.eurasiangroup.org">www.eurasiangroup.org</a></td>
</tr>
<tr>
<td>Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG)</td>
<td><a href="http://www.esaamlg.org">www.esaamlg.org</a></td>
</tr>
<tr>
<td>European Commission</td>
<td><a href="http://www.ec.europa.eu">www.ec.europa.eu</a></td>
</tr>
<tr>
<td>Europol</td>
<td><a href="http://www.europol.europa.eu">www.europol.europa.eu</a></td>
</tr>
<tr>
<td>Financial Action Task Force of Latin America (GAFILAT)</td>
<td><a href="http://www.gafilat.org">www.gafilat.org</a></td>
</tr>
<tr>
<td>Groupe d’Action Contre Le Blanchiment En Afrique Centrale (GABAC)</td>
<td><a href="http://www.spgabac.org">www.spgabac.org</a></td>
</tr>
<tr>
<td>Groupe Intergouvernemental d’Action Contre Le Blanchiment En Afrique (GIABA)</td>
<td><a href="http://www.giaba.org">www.giaba.org</a></td>
</tr>
<tr>
<td>Group of International Financial Centre Supervisors (GIFCS)</td>
<td><a href="http://www.gifcs.org">www.gifcs.org</a></td>
</tr>
<tr>
<td>Global Organization of Parliamentarians Against Corruption (GOPAC)</td>
<td><a href="http://www.gopacnetwork.org">www.gopacnetwork.org</a></td>
</tr>
<tr>
<td>International Monetary Fund (IMF)</td>
<td><a href="http://www.imf.org">www.imf.org</a></td>
</tr>
<tr>
<td>International Criminal Police Organisation (Interpol)</td>
<td><a href="http://www.interpol.int">www.interpol.int</a></td>
</tr>
<tr>
<td>Middle East and North Africa Financial Action Task Force (MENAFATF)</td>
<td><a href="http://www.menafatf.org">www.menafatf.org</a></td>
</tr>
<tr>
<td>Organization for Security and Co-operation in Europe (OSCE)</td>
<td><a href="http://www.osce.org">www.osce.org</a></td>
</tr>
<tr>
<td>United Nations Office On Drugs and Crime (UNODC)</td>
<td><a href="http://www.unodc.org">www.unodc.org</a></td>
</tr>
<tr>
<td>World Bank</td>
<td><a href="http://www.worldbank.org">www.worldbank.org</a></td>
</tr>
<tr>
<td>World Customs Organization (WCO)</td>
<td><a href="http://www.wcoomd.org">www.wcoomd.org</a></td>
</tr>
</tbody>
</table>

### INTERNATIONAL PARTNER

<table>
<thead>
<tr>
<th>Organization</th>
<th>Website</th>
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</thead>
<tbody>
<tr>
<td>Basel Committee on Banking Supervision</td>
<td><a href="http://www.bis.org">www.bis.org</a></td>
</tr>
<tr>
<td>Basel Institute on Governance – International Centre for Asset Recovery (ICAR)</td>
<td><a href="http://www.baselgovernance.org/icar">www.baselgovernance.org/icar</a></td>
</tr>
<tr>
<td>Camden Asset Recovery Interagency Network (CARIN)</td>
<td><a href="http://www.carin.network">www.carin.network</a></td>
</tr>
<tr>
<td>Comision Interamericana para el Control del Abuso de Drogas (CICAD-OAS)</td>
<td><a href="http://www.cicad.oas.org">www.cicad.oas.org</a></td>
</tr>
<tr>
<td>Commonwealth Secretariat</td>
<td><a href="http://www.thecommonwealth.org">www.thecommonwealth.org</a></td>
</tr>
<tr>
<td>Council of Europe</td>
<td><a href="http://www.coe.int">www.coe.int</a></td>
</tr>
<tr>
<td>European Union</td>
<td><a href="http://www.europa.eu">www.europa.eu</a></td>
</tr>
<tr>
<td>International Association of Insurance Supervisors (IAIS)</td>
<td><a href="http://www.iaisweb.org">www.iaisweb.org</a></td>
</tr>
<tr>
<td>International Bar Association</td>
<td><a href="http://www.antimoneylaundering.org">www.antimoneylaundering.org</a></td>
</tr>
<tr>
<td>International Criminal Court (ICC)</td>
<td><a href="http://www.icc-cpi.int">www.icc-cpi.int</a></td>
</tr>
<tr>
<td>International Money Laundering Information Network (IMoLIN)</td>
<td><a href="http://www.imolin.org">www.imolin.org</a></td>
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<tr>
<td>International Organization of Securities Commissions (IOSCO)</td>
<td><a href="http://www.iosco.org">www.iosco.org</a></td>
</tr>
<tr>
<td>International Organisation of Supreme Audit Institutions (INTOSAI)</td>
<td><a href="http://www.intosai.org">www.intosai.org</a></td>
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<tr>
<td>Organisation for Economic Co-operation and Development (OECD)</td>
<td><a href="http://www.oecd.org">www.oecd.org</a></td>
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<tr>
<td>UN 1267 Committee</td>
<td>&quot;Webpage not found&quot;</td>
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<tr>
<td>United Nations Counter-Terrorism Committee Executive Directorate (CTED)</td>
<td><a href="http://www.un.org/sc/ctc/about-us">www.un.org/sc/ctc/about-us</a></td>
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<td>United Nations International Drug Control Programme (UNODC)</td>
<td><a href="http://www.unodc.org">www.unodc.org</a></td>
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<tr>
<td>Wolfsberg Group</td>
<td><a href="http://www.wolfsberg-principles.com">www.wolfsberg-principles.com</a></td>
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