

Effective informal operational and strategic information exchange

A practical guide for FIUs

COMPANION TO INTERNATIONAL CO-OPERATION
ON ML DETECTION, INVESTIGATION, AND
PROSECUTION HANDBOOK

This brochure provides Financial Intelligence Units (FIUs) practitioners and partner organisations with a forward-looking, step-by-step guide to enhancing informal international intelligence exchange (both operational and strategic), integrating emerging technologies, and ensuring compliance with global best practices.

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Prepared For:
**FINANCIAL INTELLIGENCE
UNITS (FIUS)**

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01.

The strategic importance of informal international co-operation

Formal international co-operation through Mutual Legal Assistance (MLA) and other treaties can be slow and not always effective. **Informal exchanges between FIUs can fill this gap** by allowing rapid intelligence-sharing while still respecting confidentiality and legal frameworks.



Financial intelligence units (FIUs) are at the forefront of the fight against financial crimes, more specifically money laundering and terrorist financing. Because of their unique position, **one of the most powerful tools available to FIUs** is the ability to **exchange intelligence across borders**.

Why informal co-operation is crucial:



Enables quick identification of cross-border criminal networks.



Facilitates timely intervention before assets dissipate.



Allows FIUs to conduct pre-investigative information sharing.



Allows effective application of the risk-based approach.



Supports strategic intelligence to identify trends and emerging threats.

02.

Establishing a trusted network for informal co-operation

Informal co-operation is built on trust and FIU operational independence and autonomy, in line with FATF standards and the Egmont Group principles. FIUs should establish strong relationships with counterparts to ensure seamless exchanges. Fundamental bases of informal information sharing are provided by the FATF Standards, Recommendation 40, and the Egmont Group Principles for Information Exchange between FIUs.



Key steps to building trust:

- **Regular engagement:** Attend international FIU meetings, join working groups (e.g., Egmont Group, FATF and FATF-style regional bodies, as well as regional and sub-regional groups) to foster working ties, and maintain frequent communication.
- **Dedicated contact points:** Assign personnel specifically for handling international informal co-operation.
- **Bilateral/multi-lateral relationships:** Establish direct points of contact with FIUs that are key partners based on shared risks and exposure as well as common operational priorities.
- **Capacity building:** Organise joint training sessions and workshops to align methodologies, build confidence, and pave the way for joint operational work where possible.
- **Secure communication channels:** Always use recognised and encrypted platforms such as the Egmont Secure Web (ESW) or FIU.net to ensure confidentiality.
- **Consider a common set of rules:** Prepare and approve common principles for information exchange, data protection, and confidentiality rules.

03.

Conducting effective informal information exchange



Step 01. Define the objective and assess the needs for co-operation

Before requesting information, **clarify the exact need**

Operational intelligence:

Specific cases, financial transactions, entity linkages, assets identification.

Strategic intelligence: Trends, typologies, emerging risks.

Assess the need for co-operation:

Not all STRs/SARs with an international element should automatically result in a request for information.

Such requests should be made only after the requesting FIU has conducted a preliminary assessment indicating that the requested

information is likely to contribute meaningfully to intelligence gathering and case analysis, and that a quality and timely response from the counterpart FIU is reasonably expected.

While the potential value of spontaneous disseminations to receiving FIUs and their partners may not always be apparent in advance, sending FIUs should make efforts to consider how the information provided aligns with the priorities and operational needs of the recipients.

In this regard, initiating informal dialogue with receiving FIUs to identify shared areas of interest and relevant issues in advance can greatly enhance the effectiveness and relevance of co-operation.

03.

Conducting effective informal information exchange

Step 02. Make an effective request

Use a clear and concise format that includes:

- Subject names, identifiers, and transaction details.
- Justification for the request (e.g., predicate crime when known, cross-border linkage, specify the link to the receiving jurisdiction/s, etc.).
- Preferred timeframe for response (justify the urgency of the request).
- Request prior consent for dissemination to competent authorities in urgent cases or taskforces.

Ensure proportionality—avoid fishing expeditions and only request necessary information.



Step 03. Ensure reciprocity

- Be willing to offer information in return when required^[1].
- Responding FIUs should consider interim responses in instances when the actual response cannot be provided within 30 days.
- FIUs must not place unreasonable restrictions on co-operation based on institutional status (law enforcement, administrative, judicial, etc.).

[1] In accordance with the Egmont Group Principles of Information Exchange between FIUs—which are binding on member FIUs through their voluntary membership in the Group—the exchange between FIUs should be conducted on the basis of reciprocity. Reciprocity is defined as the capacity and practice of FIUs engaged in international co-operation to obtain or access, and share similar information or financial intelligence. FIUs are expected to provide their foreign counterparts with the fullest extent of financial intelligence or information available to them under the legal framework of their jurisdiction. An FIU may, where appropriate, decline to co-operate—for instance, in cases where reciprocity is lacking or where there is a pattern of inadequate co-operation.

03.

Conducting effective informal information exchange



Step 04: Protect confidentiality and data security

- Follow the third-party rule: Ensure that shared intelligence is not disclosed outside of the FIU without prior consent. Where possible, FIUs are encouraged to provide prior consent for dissemination to the largest possible extent, in order to speed up and support ML/TF investigations.
- Ensure secure handling, storage, and disposal of exchanged information.
- Leverage privacy-enhancing technologies (PETs) to enable analysis while minimising data exposure.

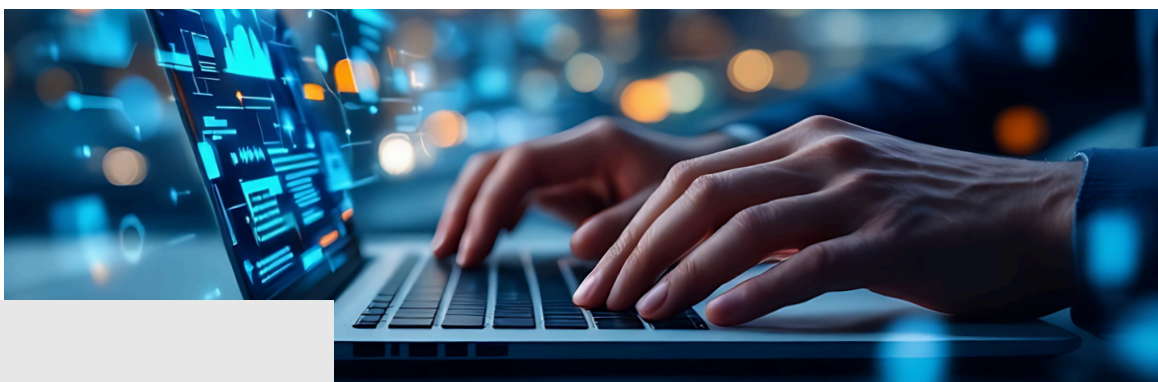
Step 05: Provide feedback

- Inform the providing FIU of how the information was used and whether further intelligence is needed.
- Share insights gained from the analysis to strengthen collaboration.
- Re-assess the quality of your requests/responses for information based on the received feedback and the quality/timeliness of the received intelligence.

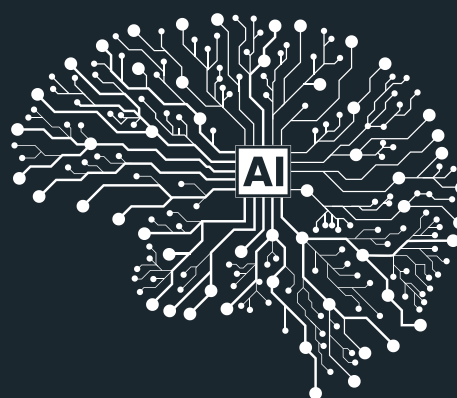
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04.

Using advanced technologies to enhance informal co-operation



As much as possible, **FIUs should try to embrace privacy-enhancing technologies and artificial intelligence (AI)** to facilitate secure and efficient cross-border co-operation.



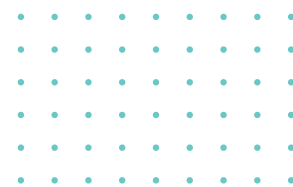
Some potential technologies to be considered



- **Homomorphic encryption:** Allows FIUs to analyse encrypted datasets without exposing raw data.
- **Secure multi-party computation (MPC):** Enables multiple FIUs to jointly analyse data without revealing their individual datasets.
- **Federated learning:** FIUs can build machine-learning models without exchanging raw data, reducing privacy risks.
- **AI-driven network analysis:** Identifies hidden connections in vast datasets using deep learning techniques.
- **Blockchain for secure audit trails:** Ensures the integrity of data exchanges and prevents tampering.

05.

Overcoming barriers to informal exchange



Legal and institutional constraints

- Work within the FATF Recommendation 29 and 40 framework to ensure compliance while maximising co-operation.
- Advocate internally for legislative amendments where necessary to allow broader intelligence-sharing powers.
- Establish Memoranda of Understanding (MOUs) for smoother co-operation where national laws require formal agreements.
- Use best practices and capacity building mechanisms available (e.g., provided by Egmont Group, UNODC, IMF, or other technical assistance providers).
- Streamline internal dissemination protocols and rules to enable rapid responses to requests and dispatch of spontaneous disseminations.

Operational challenges

- **Information exchange templates:** standardisation can assist FIUs in speeding up the information exchange.
- **Language barriers:** Use standard templates and, where possible, FIUs should invest in multilingual capabilities (e.g., AI usage for translation of information).
- **Time zone differences:** Ensure round-the-clock contact points for urgent cases.
- **Resource constraints:** Leverage regional-based approach, regional partnerships, and FIU consortia to share analytical resources.
- **Partner agency use:** Engage domestic competent authorities in early phases in cases to clarify requests in order to obtain information of actionable operational value.

06.

The future of informal FIU co-operation



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As financial crime evolves, FIUs must anticipate and adapt to new challenges.

Greater use of AI-driven investigations:

- AI-based tool to track suspicious transactions or trends across borders that can help FIUs identify shared patterns of financial crime.
- Automated risk-scoring for suspicious transactions.
- AI-based entity resolution for complex corporate structures.

Digital and virtual asset intelligence:

- Strengthening partnerships with blockchain analytics firms.
- Developing capabilities to trace illicit crypto/virtual assets transactions across borders.

Regional groups and communities of interest:

- Establish and/or leverage groups, along regional/sub-regional lines or themes of common interests (based on risk or crime types) to build trust, foster regular close co-operation and pursue joint analysis or strategic assessments.

Expanded collaboration beyond FIUs (diagonal co-operation):

- Closer partnerships with LEAs, Intelligence services, regulators, cybercrime units, customs, and tax authorities.
- Engagement with private-sector intelligence-sharing initiatives (PPPs).

06.

The future of informal FIU co-operation



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Informal international co-operation is an essential component of effective financial intelligence gathering.

Real-time threat intelligence sharing:

- Adoption of secure digital collaboration platforms for instantaneous updates on high-risk actors.
- Use of automated STRs/SARs dissemination among trusted partners.

Legal and ethical AI Governance in FIUs:

- Establishing AI ethics committees to ensure fair and unbiased use of technology in investigations.
- Enhancing auditability and transparency in AI-driven risk assessment models.



“Informal co-operation plays a crucial role in sharing intelligence and other relevant information, accelerating investigations, enabling quick responses, and fostering deeper collaboration.”

Effective informal operational and strategic information exchange

A quick guidance for FIUs

Establishing a trusted network for informal co-operation

Key steps to building trust

- Regular engagement
- Dedicated contact points
- Bilateral/multi-lateral relationships
- Capacity building
- Secure communication channels
- Consider a common set of rules



Conducting effective informal information exchange

Necessary Steps

- Step 1:** Define the objective and assess the needs for co-operation
- Step 2:** Make an effective request
- Step 3:** Ensure reciprocity
- Step 4:** Protect confidentiality and data security
- Step 5:** Provide feedback



Conducting effective informal information exchange

Some potential technologies to be considered

- Homomorphic encryption
- Secure multi-party computation (MPC)
- Federated learning
- AI-driven network analysis
- Blockchain for secure audit trails



Overcoming barriers to informal exchange

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By adopting a proactive approach, leveraging cutting-edge technology, and fostering strong partnerships, FIUs can strengthen their ability to combat financial crime in an increasingly complex and interconnected world.

Strengthening Global Networks



Empowering FIUs in the fight against financial crime

Informal international co-operation is an essential component of effective financial intelligence gathering. By adopting a proactive approach, leveraging cutting-edge technology, and fostering strong partnerships, **FIUs can strengthen their ability to combat financial crime** in an increasingly complex and interconnected world. The future of FIU collaboration lies in balancing speed, security, and compliance, ensuring that information exchange remains both effective and ethical.

This document provides FIU practitioners with an advanced, pragmatic, and forward-looking roadmap for optimising informal international information exchange. Implementing these best practices will ensure that FIUs remain ahead of evolving financial crime threats while maintaining the highest standards of confidentiality and data security.

Find out more about
each organisation:

www.egmontgroup.org

www.fatf-gafi.org

www.interpol.int

www.unodc.org

