



EU Global Facility

on

Anti-Money Laundering and countering the Financing of Terrorism



Funded by
the European Union



EU AML / CFT
GLOBAL FACILITY

Forewords



**PETER M. WAGNER, DIRECTOR
HEAD OF SERVICE, SERVICE FOR FOREIGN POLICY
INSTRUMENTS (FPI) - EUROPEAN COMMISSION**

In the 21st century, financial crimes have become increasingly sophisticated and transnational. Money laundering and terrorist financing threaten the stability and security of nations worldwide. Despite considerable progress in recent years, many countries still have low awareness of anti-money laundering and countering the financing of terrorism (AML/CFT) issues, weak or inadequate legal and institutional frameworks, and insufficient cooperation and exchange of information between key actors and institutions.

In 2017, the European Commission established the EU Global Facility on AML/CFT to support countries worldwide in strengthening their policy, legislative and regulatory frameworks and building their analytical and institutional capacity, in line with EU directives on AML/CFT, UN Security Council resolutions and FATF recommendations. Guided by the multiplier effect of coordination and cooperation, the Facility engages with all actors of the financial investigation and penal chain in creating a safer, more secure global financial landscape, including public bodies, civil society actors, media, and the private sector at national, regional and international levels.

With the EU Global Facility currently operating on 5 continents, with the ability to deliver in 6 languages thanks to a network of over 130 experts from 40 nationalities, the results have been remarkable. As of 2023, more than 100 countries have been involved in regional activities delivered by the EU Global Facility while over 30 countries have been engaged in bilateral technical assistance, with some being subsequently “delisted” by the Financial Action Task Force (FATF).

However, our work continues to be more important than ever. We envision a future where AML/CFT frameworks will be deployed to face more efficiently the weaknesses used by financial criminals to launder money. As terrorist groups and organised criminals constantly update their modalities, our ambition is to remain one step ahead, leveraging cutting-edge tools and intelligence-sharing to stop illicit financial flows for individual terrorists and terrorist organisations.



**JOHN BERRIGAN, DIRECTOR-GENERAL FOR FINANCIAL STABILITY
FINANCIAL SERVICES AND CAPITAL MARKETS UNION -
EUROPEAN COMMISSION**

The fight against money laundering and countering the financing of terrorism is a high priority for the European Commission. This is illustrated not least by the fact that it presented an ambitious anti-money laundering (AML/CFT) package in 2021. This package consists of legislative proposals for a Regulation establishing a new EU AML/CFT Authority, a Regulation on AML/CFT, a sixth AML Directive and a revision of the Regulation on Transfers of Funds. The new EU AML/CFT Authority will be the centrepiece of the new integrated AML/CFT supervisory system.

The Commission is an active member of the Financial Action Task Force (FATF), the global AML/CFT standard setter, which leads the fight against money laundering and terrorism financing globally. As peer pressure remains a key driver for change, mutual evaluations and follow up processes conducted by the FATF help raise global compliance with international standards. The Commission actively contributes to the work of the FATF and remains committed to implementing FATF standards and to promoting compliance globally, as well as to supporting efforts to address new and emerging risks at global level. The Global Facility is instrumental to this goal, as it has funded trainings delivered by the FATF to build expertise on the FATF Standards and has cooperated closely with FATF-Style Regional Bodies (FSRB) by co-sponsoring regional conferences on key themes of relevance in the field of AML/CFT, such as beneficial ownership and virtual assets, in line with the current priorities of the FATF.

The Global Facility provides a constructive link between rulemaking and concrete implementation on the ground. It enhances local understanding, provides targeted trainings, and develops tailor-made programmes for the project partner. The Global Facility is a reliable partner for the project partners. This is demonstrated not least by the fact that the number of activities has continuously increased in recent years (from 43 in 2020 to 162 activities in 2023).

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At a Glance



30+

countries engaged in bilateral technical assistance delivered by the EU Global Facility.

100+

countries involved in regional activities organised by the project.

130

experts from 37 nationalities mobilised by the project.

6

5 continents where the EU Global Facility delivers technical assistance in 6 languages.

Budget



Financed by the European Commission, Service for Foreign Policy Instruments.

Project duration



2022

104
Activities

2023

162
Activities

2021

89
Activities

2020

43
Activities

Introduction

WHO ARE THE KEY INTERNATIONAL ACTORS IN THE FIGHT AGAINST MONEY LAUNDERING AND TERRORIST FINANCING?

At the international level, the Financial Action Task Force –which the European Commission is a member of-, leads global action to tackle money laundering, terrorist and proliferation financing, in coordination with the FATF Style Regional Bodies (FSRBs), namely the Asia/Pacific Group on Money Laundering (APG); the Caribbean Financial Action Task Force (CFATF); the Eurasian Group (EAG); the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG); the Groupe d'Action contre le Blanchiment d'argent en Afrique Centrale (GABAC); the Financial Action Task Force of Latin America (GAFILAT); the Inter Governmental Action Group against Money Laundering in West Africa (GIABA); the Middle East and North Africa Financial Action Task Force (MENAFATF) and the Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL). Other important actors include the Egmont Group –in which the Commission is an observer-, and the Camden Asset Recovery Inter-Agency Network (CARIN).

WHAT DOES THE FINANCIAL ACTION TASK FORCE DO?

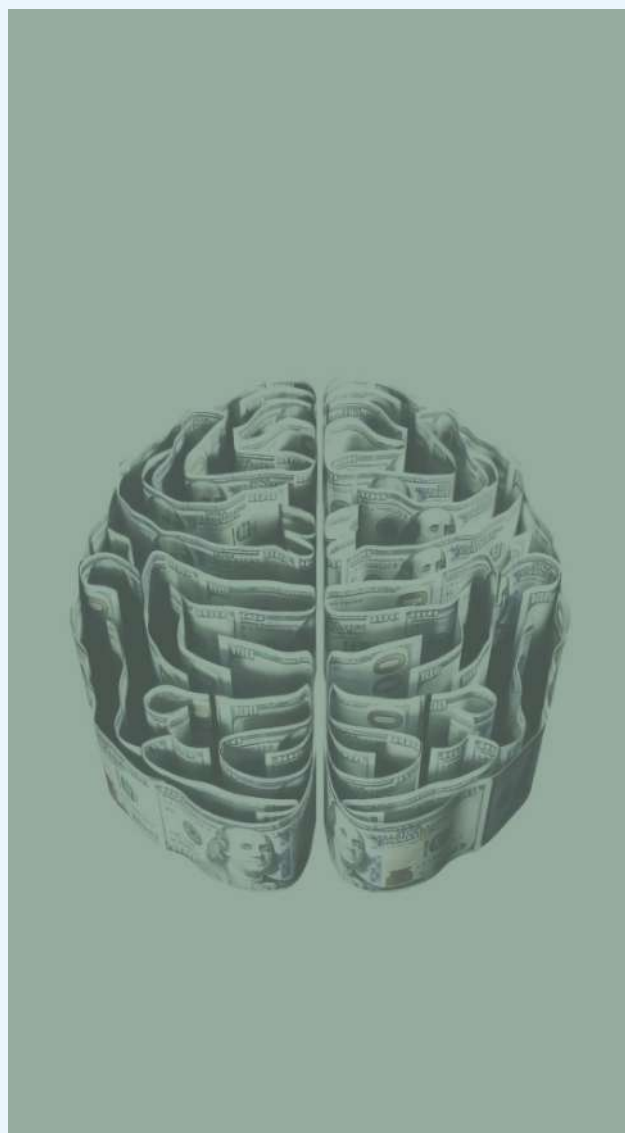
Established in 1989, the Financial Action Task Force (FATF) sets international standards (called Recommendations) to ensure national authorities can effectively go after illicit funds linked to drugs trafficking, the illicit arms trade, cyber fraud and other serious crimes. The 40 FATF Recommendations provide a comprehensive framework of laws, regulations and operational measures to ensure national authorities can take effective action to detect and disrupt financial flows that fuel crime and terrorism, and punish those responsible for illegal activity. More than 200 countries and jurisdictions have committed to implement the FATF's Standards.

The FATF monitors countries to ensure they implement the FATF Recommendations fully and effectively. Mutual/peer evaluations are undertaken on an ongoing basis, with the help of the nine FATF Style Regional Bodies (FSRBs) and other global partners, the International Monetary Fund and World Bank. The assessment looks at whether a country has met the technical requirements of each of the 40 FATF Recommendations in its laws, regulations and other legal instruments. The assessment also looks at 11 key areas, known as immediate outcomes, to determine the level of effectiveness of a country's efforts.

WHAT IS THE EU'S APPROACH TO AML/CFT?

The EU is at the forefront of AML/CFT efforts, going further than FATF Recommendations on a number of issues to promote the highest standards for anti-money laundering and counter terrorism financing. Throughout the years, the EU has published numerous AML/CFT Directives, action plans and legislation, which have been constantly revised in order to mitigate risks relating to

money laundering and terrorist financing. As a founding member of the Financial Action Task Force, the Commission considers countries identified by the Financial Action Task Force as having strategic deficiencies a starting point for its assessment on high-risk third countries. In addition, the EU has its own autonomous measures to identify high-risk third countries which have strategic deficiencies in their AML/CFT regimes that pose significant threats to the integrity of the EU financial system of the and, therefore, the proper functioning of the EU internal market. The Commission is also committed to assist third countries and to provide technical assistance for supporting implementation of FATF recommendations and relevant UN Security Council Resolutions, and the European Union is one of the leading donors in the world on technical assistance on AML/CFT.





Chapter 1

Regulation and Financial Intelligence Units

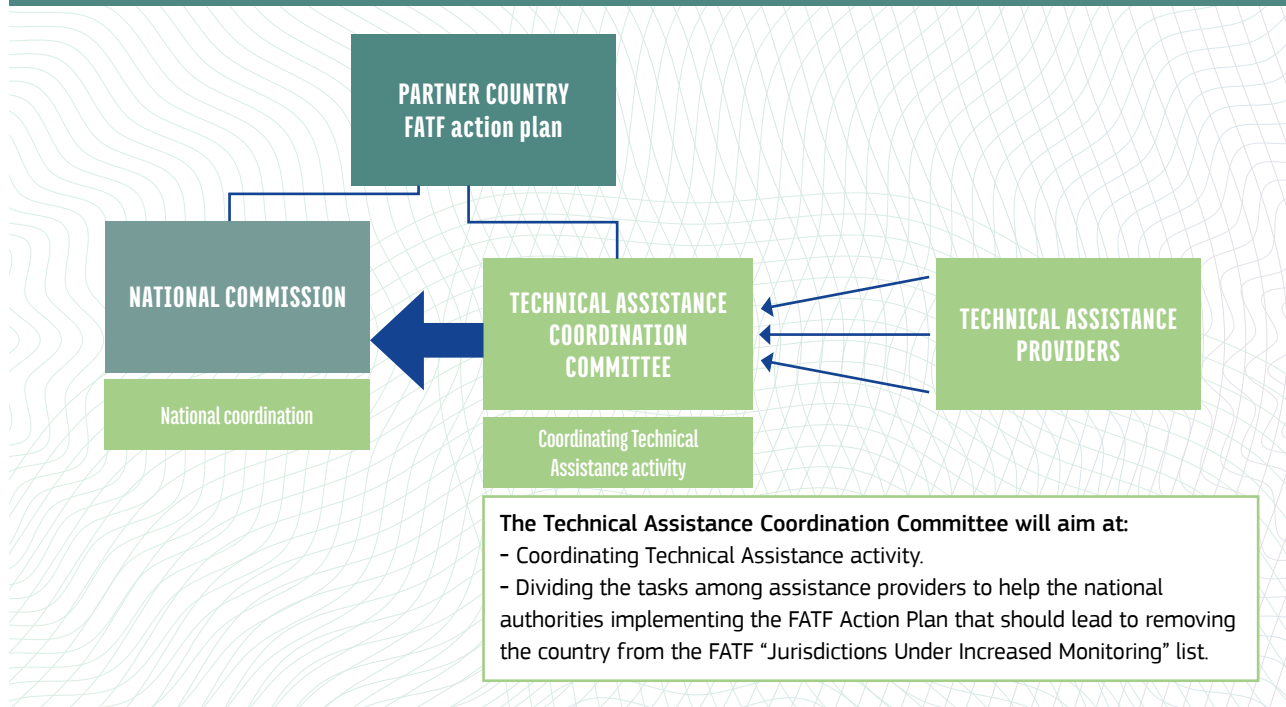
The work conducted under the Regulation/ Financial Intelligence Units (FIUs) component plays a crucial role in supporting competent authorities to detect the financing of criminal activities. Collaborating with a diverse range of actors involved in the prevention stage of the penal chain, including regulators, supervisors, FIUs, the private sector's obliged entities, the EU Global Facility addresses key thematic areas in combating financial crime. The core of this technical assistance includes the following themes: Supervision, Virtual Assets, Strategic Approach, Correspondent Banking, and Targeted Financial Sanctions.

STRATEGIC APPROACH

Countries are required to understand their money laundering and terrorist financing risks as part of the Financial Action Task Force (FATF) Immediate Outcome 1. They are also expected to coordinate domestic actions and establish mechanisms or bodies to ensure effective cooperation and coordination within their national frameworks. Additionally, they need to implement Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) policies at both policy-making and operational levels. Financial Intelligence Units are key actors in these processes. They serve as national centres for the receipt and analysis of suspicious transaction reports and relevant money laundering information, associated predicate offences, and terrorist financing.

The EU Global Facility has developed an innovative supporting tool, the Technical Assistance Coordination Committees, to help partner countries achieve those goals. The TACC assists them in establishing a body and associated mechanisms to coordinate and structure all technical assistance activities. The TACC also seeks to strengthen compliance with the FATF's International Cooperation Review Group (ICRG) requirements, based on the experience acquired by other countries during the ICRG process.

IMPLEMENTATION OF A TECHNICAL ASSISTANCE COORDINATION COMMITTEE IN PARTNER COUNTRIES



CORRESPONDENT BANKING

The EU Global Facility helps jurisdictions to better understand FATF Recommendation 13 and EU best practices, notably with regards to customer due diligence measures in cross-border correspondent relationships compared to domestic ones.

Through regional conferences centered on the reinforcement of public private partnership coordination and knowledge sharing, the project provides comprehensive support on the issue of de-risking (causes and consequences), and the main drivers behind the termination of correspondent banking relationships.

The EU Global Facility creates platforms bringing together industry representatives –such as Society for Worldwide Interbank Financial Telecommunication (SWIFT) and the Wolfsberg Group- correspondent and respondent banks, supervisory authorities from partner countries and EU member states, along with Financial Intelligence Units. On these unified platforms, relevant stakeholders address the challenges faced by correspondent banks, highlighting the practical roles, tools, and solutions available for supervisors to design and implement risk-based supervision strategies. Additionally, the EU Global Facility facilitates exchanges of good practices on the practical expectations from Financial Intelligence Units in receiving, analysing, and disseminating suspicious transaction reports related to correspondent banking.

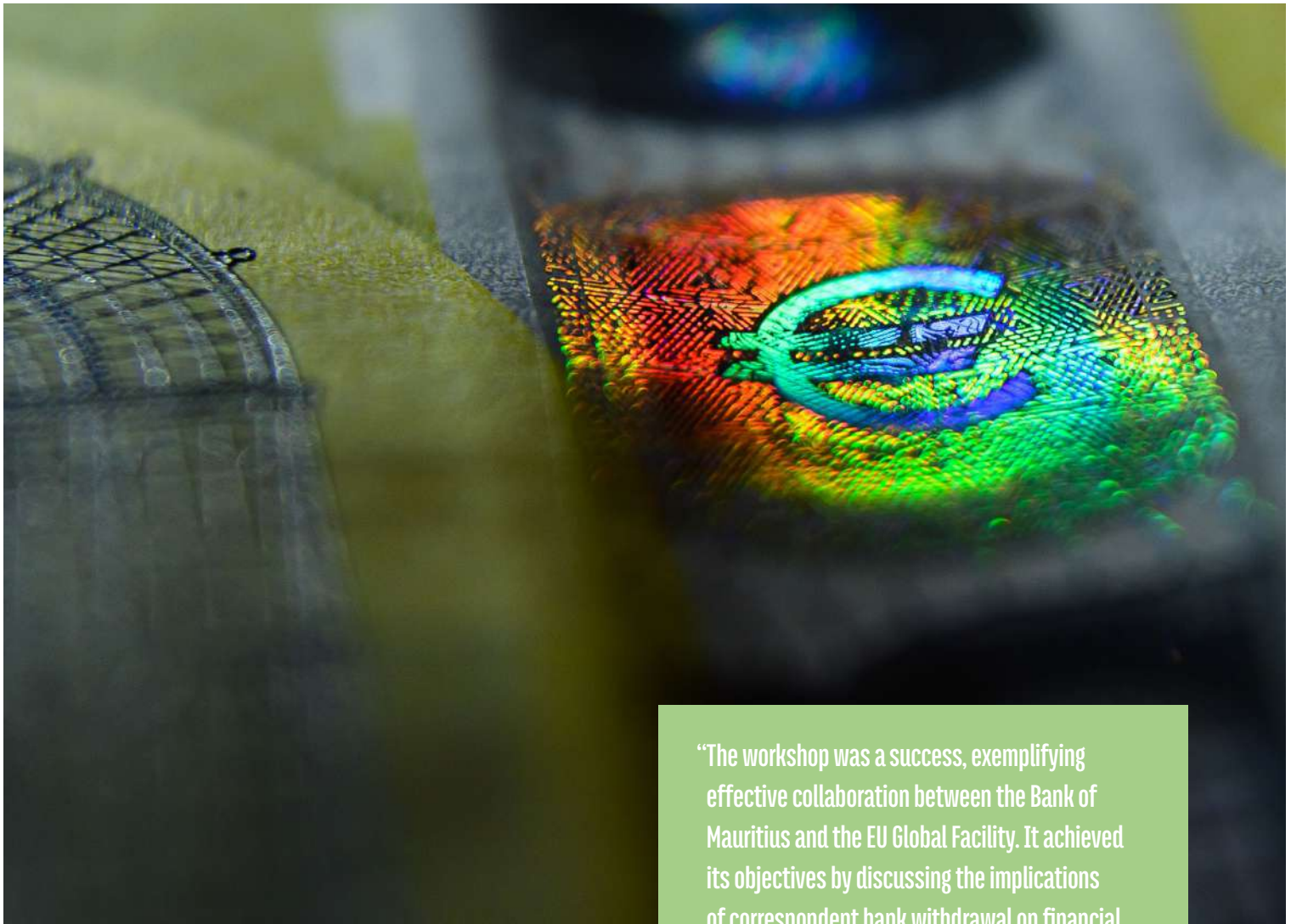
These exchanges also serve to discuss the issues that law enforcement agencies face in conducting investigations on financial crimes involving correspondent banking relationships, including relevant typologies and their consequences.

TARGETED FINANCIAL SANCTIONS

The project’s strategy for remedying the deficiencies identified by the FATF on **Targeted Financial Sanctions** (Recommendations 6 & 7 and Immediate Outcomes 10 & 11) focuses on two main areas: strengthening technical compliance and enhancing efficiency.

The first phase involves a gap analysis of the existing laws to ensure compliance with Recommendation 6 (targeted financial sanctions related to the fight against terrorism financing) and Recommendation 7 (proliferation-related targeted financial sanctions). This includes identifying competent authorities, defining obligations for reporting frozen assets, communicating designations, protecting bona fide third parties, and establishing access to frozen funds. Additionally, training sessions are provided by the EU Global Facility to enhance understanding of the obligations under SWIFT and the role of Targeted Financial Sanctions in combating terrorism financing and nuclear proliferation.

Once technical compliance work is completed, the second phase focuses on efficiency enhancement. This includes implementing processes to operationalise adopted legal frameworks, such as identifying targets, communicating/withdrawing lists, and unfreezing funds. It also involves setting up processes for monitoring and reporting frozen assets to comply with the FATF’s request for statistics. Efforts are also made to raise awareness among supervisors and the private sector to ensure effective application of targeted financial penalties. Overall, the strategy aims to strengthen the country’s capacity to implement targeted financial sanctions by establishing dedicated institutional frameworks, enhancing monitoring processes for frozen assets, and promoting compliance awareness among relevant authorities and the private sector.



VIRTUAL ASSETS

Cryptocurrencies have drastically evolved in the past years, with their different types and models. In particular, the virtual assets ecosystem has seen the rise of anonymity-enhanced cryptocurrencies, mixers and tumblers, decentralised platforms and exchanges, privacy wallets, and other types of products and services that enable or allow for reduced transparency and increased obfuscation of financial flows. They also lead to the emergence of other virtual asset business models or activities such as initial coin offerings that present Money Laundering and Terrorist Financing (ML/TF), fraud and market manipulation risks.

Given the development of additional products and services and the introduction of new types of providers in this space, the FATF recognised the need for further clarification on the application of the FATF Standards to new technologies and providers. The effective global implementation of these standards by all countries will ensure virtual asset technologies and businesses can continue to grow and innovate in a responsible way, creating a level playing field. It will also prevent criminals or terrorists from seeking out and exploiting jurisdictions with weak or no supervision.

In light of this rapid evolution, the EU Global Facility assists countries in navigating the complex landscape of virtual assets (VAs) by facilitating the assessment of whether to ban or regulate them. This evaluation is conducted through a comprehensive national risk assessment. Following this decision, the project supports its implementation process by tailoring national

“The workshop was a success, exemplifying effective collaboration between the Bank of Mauritius and the EU Global Facility. It achieved its objectives by discussing the implications of correspondent bank withdrawal on financial systems, remittances, and financial inclusion, underlining the need for global solutions.”

HARVESH SEEGOLAM
GOVERNOR BANK OF MAURITIUS

supervisory programmes through effective public-private partnerships. Additionally, the EU Global Facility helps strengthen the investigative capabilities of countries, enabling them to effectively analyse suspicious transaction reports and conduct financial investigations related to VAs.

There are four outcome areas that the EU Global Facility covers in the development of cryptocurrencies framework. They are designed to identify and address specific issues in a particular context while also supporting processes of collective learning and problem solving in the face of common challenges, namely:

- 1 Assessing the risks related to cryptocurrencies and their service providers;
- 2 Supervising virtual asset service providers;
- 3 Investigating and tracing virtual assets; and
- 4 Seizing and confiscating virtual assets and managing them.

The EU Global Facility has developed a methodology aimed at:

- 1 Partnering with countries to better understand the VA environment and, ultimately, decide to either approve or ban VAs.
- 2 Helping partner countries in identifying and equipping themselves with the tools to conduct their own Risk Assessment on VA.
- 3 Supporting countries in their VAs investigations and eventually seizure and confiscation.



VIRTUAL ASSETS (VA) AND VIRTUAL ASSETS SERVICE PROVIDERS (VASP)

1 CONDUCTING VA RISK ASSESSMENT

Assessing the risks related to cryptocurrencies and their service providers.

2 IMPLEMENTING VA RISK ASSESSMENT (SUPERVISION)

Supervision regarding virtual assets service providers.



4 VA FREEZING, CONFISCATING AND ASSET MANAGEMENT

Seizure and confiscation of virtual assets, and their management.

3 VA INVESTIGATIONS

Investigating and tracing virtual assets.

TRAINING - TOOLS - EXERCISES



Chapter 2

Beneficial Ownership

On the topic of Beneficial Ownership (BO), the EU Global Facility focuses on addressing the challenges and risks associated with BO disclosure frameworks. It encompasses various areas of implementation, to combat the misuse of legal persons and arrangements. The project also conducts risk assessments, supports the development of legal and regulatory frameworks, and assists in establishing operational models for beneficial ownership. The project provides comprehensive guidance on identifying, verifying, supervising, and enforcing beneficial ownership information. Additionally, it supports jurisdictions in procuring and maintaining IT services as well as monitoring IT developments related to beneficial ownership.

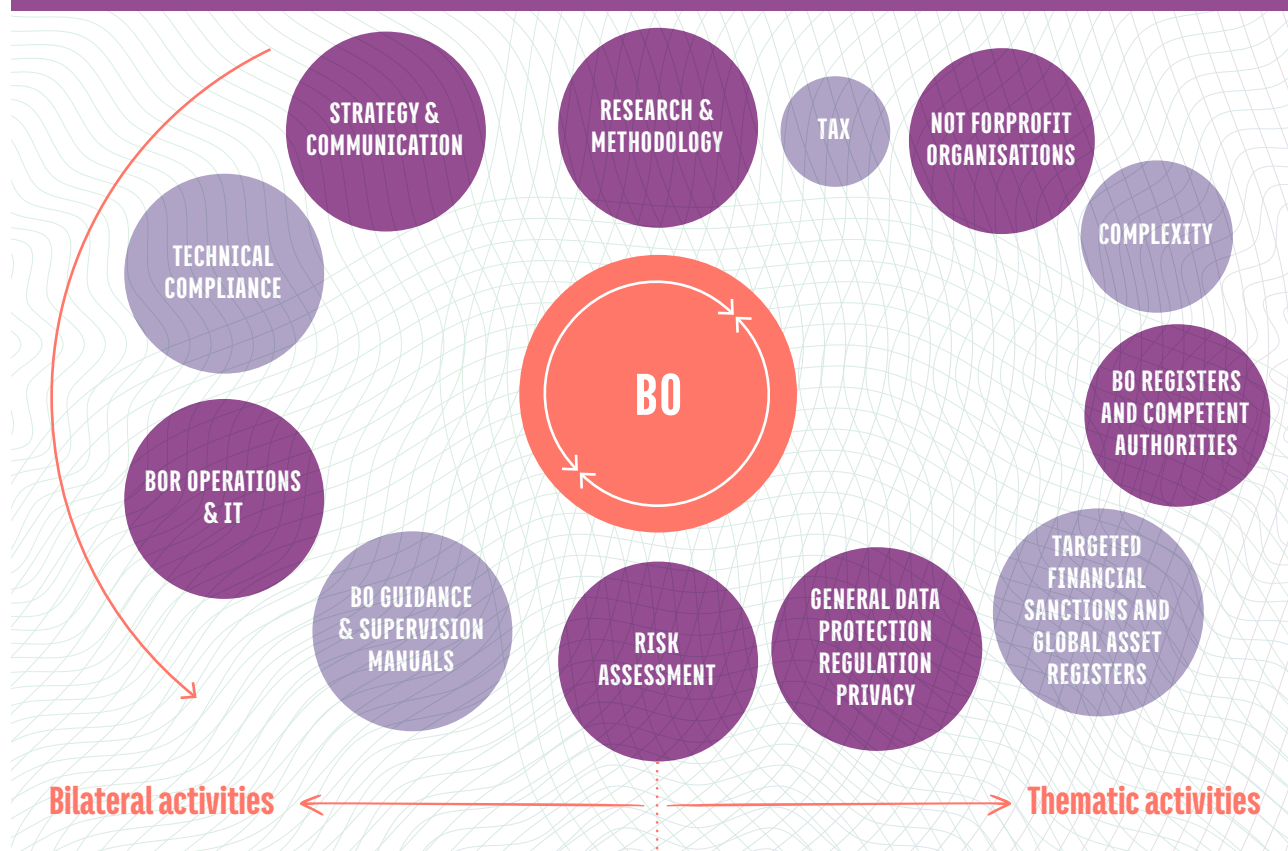
Recognising the complexity of implementing Beneficial Ownership (BO) frameworks, the EU Global Facility developed a strategy to deliver activities tailored to all stakeholders from public and private sectors involved in the fight against the misuse of legal persons and arrangements. This strategy - which targets the implementation of FATF Recommendations 24 and 25, and the effectiveness with regards to Immediate Outcome 5 - is structured around three types of activities: cross-cutting, bilateral and thematic.

BILATERAL ACTIVITIES

Bilateral activities are specifically tailored to the needs of the partner jurisdiction and are undertaken jointly with the national authorities applying the EU Global Facility's technical knowledge and methodology. Support activities are implemented on a gradual timeframe, with various workstreams targeting policy makers, financial supervisors and regulators, BO registries, law enforcement agencies, financial institution and other relevant businesses and professions (e.g., lawyers, notaries, accountants, real estate agents).

Under the **BO strategy and communication workstream**, the project works with partner countries to develop effective BO strategies, operating models, and workplans to structure and enable to monitoring of the BO disclosure system in the jurisdiction.

THE EU GLOBAL FACILITY'S STRATEGY ON BENEFICIAL OWNERSHIP



This work usually involves an in-depth analysis of the country's BO framework to identify its features and areas of improvements. Ultimately, this activity results in countries having a better understanding of the shortcomings or issues and the practical steps that need to be taken to address them, as well as a clear vision in terms of the time that will be needed for their implementation.

Under the **technical compliance workstreams**, the EU Global Facility provides hands-on assistance in the drafting and review of current and foreseen legislation and regulations. It also supports the drafting of guidance that serves as a basis to ensure coordination between the different national authorities as well as with the regulated entities from the private sector. As such, the project offers support in legal and regulatory drafting to align national frameworks with international standards and assist authorities in disseminating the new requirements to all relevant stakeholders.

Under the **BO registers operations and IT workstreams**, the project develops activities aimed at enhancing the effectiveness of the legal and regulatory frameworks in view of the increased focus from the FATF and the EU on the crucial role played by BO registers in the fight against money laundering and terrorist financing. The project advises jurisdictions on the practical implementation of BO registers, including the identification of the business and technical requirements related to the setup of the IT solutions, the procurement and monitoring of related IT products, as well as the training and change management that authorities in charge of such registers need to implement to evolve into a fully fledged competent authority able to ensure the highest level of quality of the information held in such registers.

Under the **Guidance and Supervision workstreams**, the EU Global Facility delivers state of the art support, guidance, and manuals to assist various supervisors in the implementation and enforcement of the beneficial ownership disclosure requirements. These guidance and manuals are also designed as a tool for said authorities to engage with their supervised entities, helping them build the necessary partnerships that are crucial in the area of AML/CFT.

Lastly, the EU Global Facility also developed its own methodology for the **Risk Assessments of Legal Persons and Legal Arrangements** to support countries in identifying and mitigating the potential risks related to the misuse of legal persons and arrangements.

“The EU Global Facility’s programme supported us in implementing and managing our BO disclosure framework through unique peer-to-peer exchanges and hands-on support, leading to a future-proof system and sustainable processes.”

SAMYA ABU SHARIF
HEAD OF THE ANTI-MONEY LAUNDERING
UNIT OF JORDAN

THEMATIC ACTIVITIES

BO transparency is a fast-moving and highly technical area. It requires international organisations, national institutions and supervisors as well as the general public to continuously increase their knowledge and understanding of the new trends, risks and threats posed by the misuse of legal vehicles and the obfuscation of BO information as well as practices and innovative solutions developed by countries to face these common challenges.

To best address this, the EU Global Facility designs and implements thematic activities in collaboration with a wide range of partners and experts from both public and private sectors. Through expert groups, closed webinars for competent authorities, FATF-Style Regional Bodies (FSRBs) and other partner organisations, the BO thematic activities seek to explore innovative and emerging topics and build long-term resilience through the development of networks experts, institutions, and stakeholders. Thematic activities often lead to closer support through bilateral activities with partners.

16 COUNTRIES HAVE RECEIVED DIRECT BILATERAL TECHNICAL ASSISTANCE FROM THE EU GLOBAL FACILITY ON BENEFICIAL OWNERSHIP

Current themes being explored include:

- Transformation of BO registries into competent authorities.
- Challenges in identifying and verifying BO information in complex ownership structures.
- Use of BO registers to enforce targeted financial sanctions, and the path towards other asset registries.
- Delivering public access to BO registers and the right to privacy.



STAGES OF THE FINANCIAL INVESTIGATION AND PENAL CHAIN



CROSS-COMPONENT APPROACH

The success of AML/CFT strategies solely depends on coordinated efforts and seamless communication between all actors of the financial investigation and penal chain, including public bodies (regulatory authorities, law enforcement agencies, the judiciary, specialised asset recovery bodies), civil society actors, media and the private sector. Only if all these players work together and correctly assess the cross-border influence of crime can the containment of ML/TF be successful.

As a result, the EU Global Facility promotes cross-functional activities between components, in the form of joint justice/law enforcement workshops, law enforcement/regulatory approaches on virtual assets, Beneficial Ownership/Civil Society courses, among many others.

This allows for an “all-penal-chain” approach in the fight against ML/TF, encompassing different and often estranged actors of the chain.



Chapter 3

Law enforcement and Intelligence

The EU Global Facility works on connecting agencies involved in law enforcement, intelligence, regulation and the judicial chain, fostering a deep understanding of the investigative challenges and opportunities in the realm of AML/CFT. The project collaborates closely with esteemed researchers, academics, and international policing to enhance AML/CFT standards, skills, and capabilities. Experts also actively promote public-private sector partnerships, both domestically and internationally, particularly in emerging sectors like Artificial Intelligence, Virtual Assets, and the Metaverse, where they identify new threats and collaborate to address them effectively.

THEMATIC: CURRENT TRENDS AND THREATS

In response to emerging global trends and threats, the EU Global Facility's Law Enforcement and Intelligence component focuses on developing pioneering research and technical assistance activities on selected thematic areas. Experts help partner countries to enhance operational effectiveness in financial investigation techniques by converting policy and procedures into effective strategies.

Art and Antiquities Trafficking and AML/CFT Investigations

The illegal trade of cultural artifacts and antiques presents significant challenges for Law Enforcement Agencies due to their complexity and transnational nature. Law enforcement resources are initially focused on immediate and subsequent investigations, but as the crime crosses jurisdictions, local law enforcement agencies may lack the necessary resources and expertise to handle complex, cross-organisational, and cross-jurisdictional evidence-based processes.

The EU Global Facility has developed a series of four regional conferences aimed at enhancing information sharing between public and private sectors, finding solutions to combat art



Participants in the Regional Conference on Art Trafficking at the Museo Nacional de Antropología of Mexico in May 2023. © 2023/EU Global Facility

trafficking, and raising awareness about the criminalisation of antiquities. The conferences - which will be held over the next two years across the globe - focus on leveraging AML legislation in the investigative process to counter these crimes effectively. The target audience includes Financial Intelligence Units, Prosecutors, law enforcement agencies, and individuals involved in cultural crime management and investigation. Ultimately, these efforts aim to protect countries' heritage and reduce the impact of AML/CFT in these lucrative markets.

“There is a high correlation between the increase in art trafficking and organised crime. In the past years, Egypt has taken numerous measures to identify, investigate and tackle this type of trafficking.”

**JUDGE AHMED SAID KHALIL
CHAIRMAN OF THE BOARD OF TRUSTEES
AML/CFT UNIT OF EGYPT**

Metaverse

The rapid emergence of the metaverse and virtual assets has given rise to growing concerns about their potential links to AML/CFT criminality. The decentralised and pseudonymous nature of virtual assets presents unique challenges in monitoring and regulating financial transactions, making it imperative for the EU Global Facility to address this emerging threat.

To tackle the complexities of virtual assets and their association with financial crimes, the EU Global Facility has designed workshops that delve into critical aspects of the metaverse.

As financial crimes within the metaverse require a hybrid approach, the EU Global Facility focuses on combining traditional investigative methodologies with new tools and techniques suited for digital environments. This includes leveraging blockchain analysis, data analytics, and artificial intelligence to trace and monitor virtual asset transactions, aiding in the identification of suspicious activities.

Multi-Agency Custodial Financial Investigations

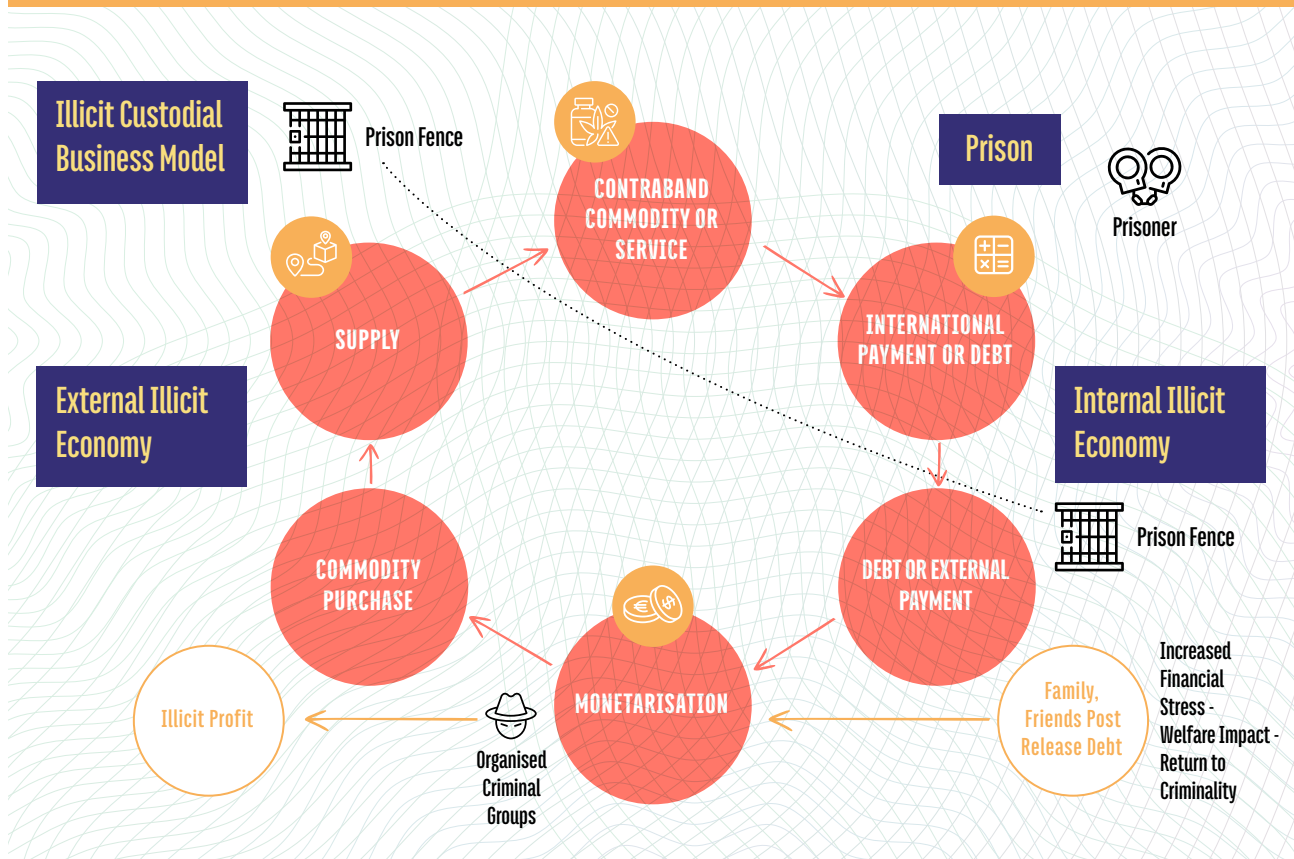
The exploitation of financial intelligence available during custodial detention processes has been identified as a key element in AML/CFT strategies. Indeed, the prison environment leads to the development of a sophisticated business model for supplying contraband, driven by the profit principle. However, one of the main difficulties in tackling this illicit economy is openly admitting the presence of organised criminal activity within prisons.

Through a pool of specialised experts, the EU Global Facility conducts specialised webinars and events to address illicit economies within national prison/custodial establishments. These initiatives equip stakeholders with the necessary knowledge and tools to combat illicit financial activities within custodial settings, contributing to broader efforts against financial crimes.

Illegal Mining (in Africa and Latin America)

The increased global footprint and impact of illegal/conflict-related mining have informed the EU Global Facility's decision to undertake an analytical review of the subject matter with the aim

MULTI-AGENCY CUSTODIAL FINANCIAL INVESTIGATIONS



of mitigating the financial crimes associated with these activities in Africa and Latin America. By focusing on this thematic area, the project aims to contribute to regional stability and security by combatting money laundering and terrorist financing.

CAPACITY BUILDING

The EU Global Facility is actively engaged in capacity building training to help partner jurisdictions to strengthen their investigative techniques. The bilateral activities organised under the Law Enforcement and Intelligence component focus notably on:

- 1 Conducting Financial Investigations
- 2 Asset identification
- 3 Seizure
- 4 Confiscation
- 5 Management of Seized Assets
- 6 Disposal of assets
- 7 Nexus between organised crime and terrorist financing

FOSTERING CROSS-AGENCY COOPERATION

Collaboration and information exchange among institutions involved in AML/CFT efforts are crucial for success. However, these

processes have been identified as problematic not only among regulators and law enforcement agencies but also between the public and private sectors. The technical assistance supplied through the EU Global emphasises the need for cross-agency cooperation encompassing police, customs, judiciary, and other relevant stakeholders, as well as the integration of AML/CFT financial investigations into every investigative process.

The project developed a workshop series on “Turning Intelligence into Evidence”, which provides tools and strategies for effective utilisation of intelligence in legal proceedings, strengthening the fight against transnational crime. Additionally, the project focuses on developing a comprehensive understanding of the relationship between civil and criminal legislation. This effort aims to raise awareness among partner countries of the importance of creating a cohesive legal framework that facilitates seamless cooperation between civil and criminal justice systems.

EXPLORING INNOVATION

The delivery of workshops and technical assistance for law enforcement agencies involved in investigating civil and criminal wrongdoing covers a vast and evolving landscape, including various financial sectors such as Hawala Banking, Traditional Banks, Virtual Assets, and Digital Banking, encompassing both regulated and unregulated entities. To effectively counter these real and emerging risks, the EU Global Facility experts conduct in-depth scientific exploration and research of new investigative strategies while leveraging recognised methodologies, both overt and covert, to stay ahead of financial criminals.



FLEXIBILITY AND RESPONSIVENESS TO EMERGING THREATS

The EU Global Facility exhibits flexibility and responsiveness in addressing the ever-evolving challenges of money laundering and terrorist financing while adapting to geopolitical development and emerging threats.

Two recent examples demonstrate its ability to swiftly innovate in response to changing circumstances:

COVID-19

During the pandemic, the EU Global Facility adopted a proactive response by creating a comprehensive e-training platform with over 110 modules in only 3 months, ensuring one of the quickest and most efficient responses in the field of distance training. Despite the challenges posed by the pandemic, the project also managed to deliver technical assistance to different parts of the world, with some of the first on-site activities being conducted in Mauritius in February 2020.

Ukraine and the Tbilisi Principles

In the wake of the Russia's aggression against Ukraine, the EU Global Facility re-engineered its scheduled activities in the region, facilitating the development of the Tbilisi Principles, which highlight the need to balance access to humanitarian aid and financial integrity during crises.



Chapter 4 Justice

The EU Global Facility provides advanced legal expertise to support the elaboration and improvement of laws and regulations. By assisting partner jurisdictions in developing new and/or updated regulations and guidelines, we help them ensure enhanced compliance with legislative and practical requirements. In addition to capacity-building activities on AML/CFT investigations, prosecution and adjudication, the project actively fosters networking and promotes international co-operation through partnerships and regional activities. The project also addresses emerging areas of interest in the AML/CFT realm, such as reversed burden of proof or forensic audit.

LEGAL EXPERTISE AND THEMATIC AREAS OF PRACTICE

At the core of the Justice component's efforts lies the commitment to strengthening the legislative framework of partner countries, in alignment with international standards. By working closely with national authorities and stakeholders, the EU Global Facility helps with the elaboration of the draft legislation and production of comprehensive guidelines that bolster legal infrastructure and processes within the penal chain. This inter alia entails the development of Judicial Manuals on financial investigations, which contribute to equipping law enforcement and justice personnel, as well as FIU and other relevant institutions from the penal chain with the necessary tools to effectively combat money laundering and terrorist financing.

Furthermore, our team of experts meticulously evaluates the existing legislative framework of our partner countries to identify areas of improvement and provide valuable feedback. This meticulous check and assessment process ensures that any gaps or shortcomings in their legal systems are addressed, leading to a more robust AML/CFT apparatus.

In its pursuit of innovation, the EU Global Facility has also introduced novel thematic activities to drive progress. The expert working group on the constitutional review, for example, focuses on

exploring ways to reverse the burden of proof for instant results. This forward-thinking approach aims to streamline legal processes and increase the efficiency of AML/CFT efforts.

Recognising the significance of practical training and capacity building, the project is developing an initiative similar to a MOOT Court on AML/CFT, providing a simulated environment for legal practitioners to hone their skills and apply their knowledge in real-life scenarios.

CAPACITY BUILDING

Aware that each stage of the penal chain in AML/CFT investigations demands specific expertise and skills, the EU Global Facility's training is thoughtfully curated to address the unique challenges faced by justice professionals during prosecution, asset tracing, confiscation and recovery.

Capacity-building programmes are therefore facilitated by experts in the field of AML/CFT and legal professionals with extensive experience in prosecuting financial crimes and adjudicating these cases. These experts impart practical insights, real-world case studies, and best practices, enabling justice professionals to develop a comprehensive understanding of the subject matter.

“The AML/CFT system within each jurisdiction is effective only if all the actors are living up to their commitments and tasks, so there is no weak chain in the process. Capacity building for the judiciary and standard setting activities of the EU Global Facility are of great added value for Zambia. We truly appreciate this partnership which helps the entire penal chain, intelligence and law enforcement agencies, to produce evidence that is acceptable and sufficient for the adjudication of the case by the judge at the court.”

JOE SANTEBE SIMACHELA
ATTORNEY GENERAL OF THE MINISTRY OF JUSTICE
ZAMBIA

NETWORKING AND INTERNATIONAL COOPERATION

Collaboration is essential in the fight against money laundering and terrorist financing. As such, the EU Global Facility actively facilitates networking opportunities and fosters co-operation with renowned international actors and relevant EU and international justice fora.

Through strategic partnerships with institutions and projects such as the Siracusa International Institute for Criminal Justice

and Human Rights and the European Union Agency for Criminal Justice Cooperation (EUROJUST), the project leverages invaluable expertise, experience, and resources on a variety of justice-related matters.

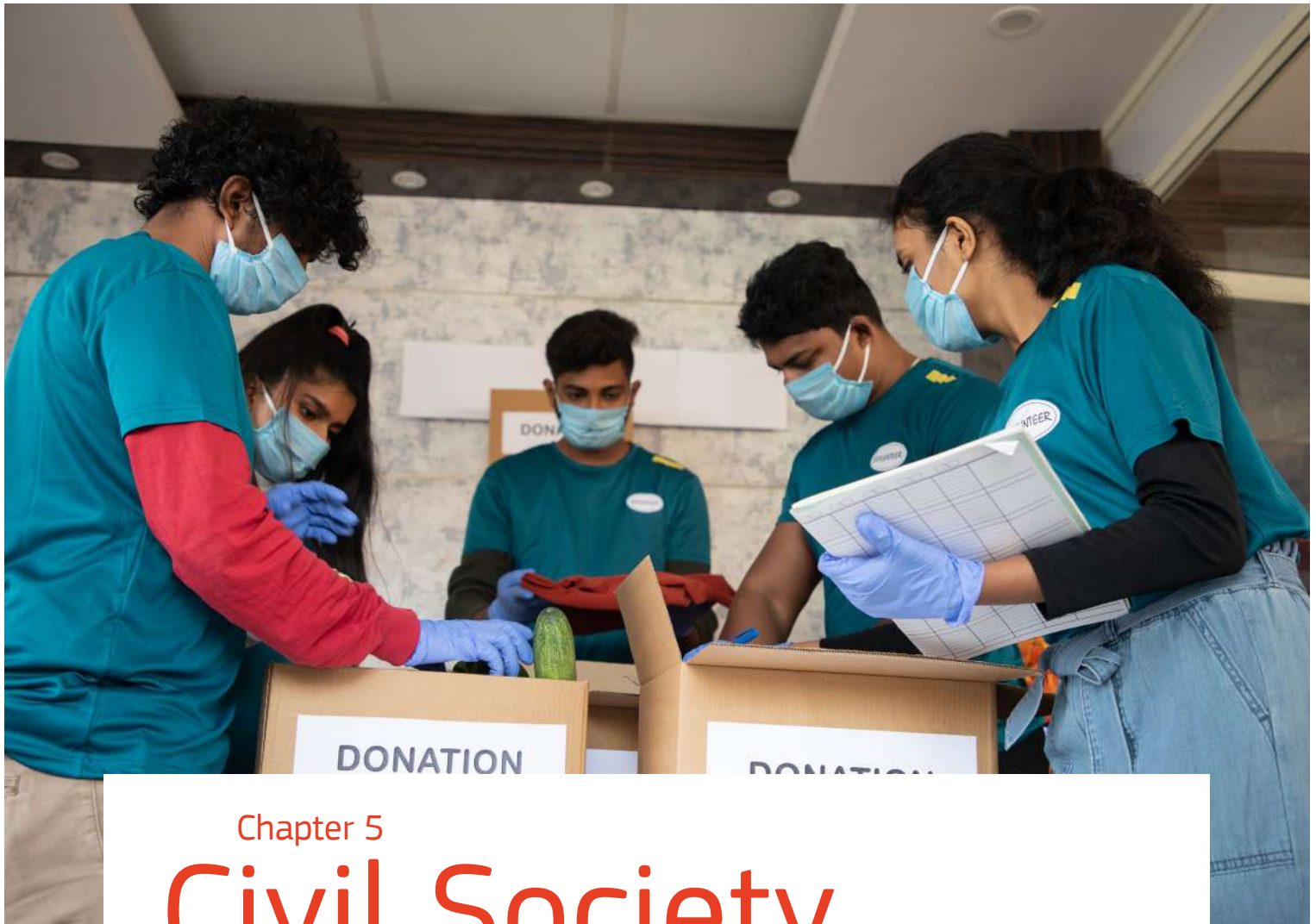
It recognises the significance of staying up-to-date with the latest developments in partner countries: thus, experts sustain frequent contacts with relevant EU and international justice fora across regions from Latin America to Europe, Africa and beyond. By actively engaging with these platforms, they gain vital insights into the specific challenges and needs of partner countries, and are therefore able to tailor technical assistance activities more effectively.

The EU Global Facility organises regional and global activities focused on international judicial cooperation. These events serve as powerful platforms for justice professionals from different countries to come together, share knowledge, exchange best practices, and collaborate in tackling cross-border financial crimes. They foster a sense of unity among justice practitioners and promote a collective response to AML/CFT challenges.

The project's engagement with international actors and justice fora also positions it to contribute to the development and advancement of AML/CFT global standards. Collaborating with esteemed institutions and participating in global forums allows experts to actively shape the conversation surrounding financial crimes and influence the formulation of policies that strengthen AML/CFT efforts worldwide.

Between 2021 and 2023, 10 regional events have been organised on various justice-related topics including forensic audit analysis, judicial cooperation in the MENA region and the reverse burden of proof.





Chapter 5

Civil Society Organisations and Media

The EU Global Facility leads global efforts to protect the financial integrity of the Not-for-Profit Organisation (NPO) sector and ensure compliance with FATF Recommendation 8 on Combating the Abuse of Non-Profit Organisations whilst defending the fundamental freedoms of civil society. By providing partners in government and civil society with technical assistance and capacity building, experts support the implementation of a targeted, risk-based and proportionate approach to NPO oversight, rooted in collaborative risk assessments.

The project fosters dialogue between governments and the sector at national, regional and global levels, and contributes to improved policy-discussions with our ground-breaking research.





Cape Town, South Africa (May 2023)



Amman, Jordan (May 2023)

LEGAL EXPERTISE AND SPECIALISED/THEMATIC SUPPORT

Recommendation 8

One of the project's primary focuses is to support partner jurisdictions to better comply with Recommendation 8 requirements. It does so by assisting them in preparing and elaborating NPO Sectoral Risk Assessments, which are a crucial pre-condition for a positive re-assessment by the FATF and FATF-Style Regional Bodies in terms of compliance with the requirements of FATF Recommendation 8. This multifaceted approach encompasses the following key areas:

- 1 **Technical assistance is rooted in the project's experts deep understanding of the FATF, with a track-record of helping jurisdictions to demonstrate compliance with the core FATF requirements on Recommendation 8.**
- 2 **Approach is based on partnership, to ensure that the assistance is flexible and adjusted to the country's context and needs.**
- 3 **The EU Global Facility fully engages civil society as a full and equal partner throughout the process, which safeguards civil society freedoms and ensures outcomes are truly sustainable.**
- 4 **Methodologies, tools and guidance are provided by the project and adjusted to country needs. Full and on-going support throughout the risk assessment process and beyond is then offered.**
- 5 **Work is conducted in close collaboration with the Global NPO Coalition on FATF and its leading organisations (Human Security Collective, International Center for Not-for-Profit Law, and the European Center for Not-for-Profit Law).**

Research

In addition to providing support on Recommendation 8, the project undertakes research initiatives to delve into lesser-explored

areas, including AML/CFT risks in the NPOs sports sector, social finance, and other relevant topics.

Media

The EU Global Facility understands the critical role the media plays in monitoring and exposing illicit financial activities. To ensure accurate and timely reporting on AML/CFT news, it has developed a state-of-the-art monitor and statistical tool. This innovative tool empowers investigative journalists and stakeholders to track, analyse and report on AML/CFT-related incidents with comprehensive data insights.

CAPACITY BUILDING

The EU Global Facility offers comprehensive capacity-building training to various stakeholders, including authorities, regulators, and NPOs within partner jurisdictions. Mostly centered around compliance with the requirements of FATF Recommendation 8, these courses seek to enhance the understanding and awareness of AML/CFT risks specific to CSOs. By equipping relevant stakeholders with essential tools and knowledge, the project empowers them to bolster their mechanisms for preventing, detecting, and combatting illicit financial activities within the sector.

This approach -which involves training sessions tailored to the specific requests of partner countries- has resulted in

“The efforts of the EU Global Facility to find solutions in dealing with the challenges of complying with FATF Recommendation 8, through its close partnership with the Global NPO Coalition on FATF, are extremely useful and produce tangible results. This work effectively addresses the lack of understanding and coordination amongst jurisdictions.”

**JIMENA ZICAVO
NATIONAL COORDINATOR ON AML/CFT
ARGENTINA**



Buenos Aires, Argentina (May 2023)



Bali, Indonesia (August 2023)

positive re-rating for jurisdictions seeking compliance with FATF Recommendation 8 and IO 10.

Critical to the EU Global Facility's success is the collaboration with civil society partners. NPOs are a full and integral partner at every stage of the process. They provide an informed and critical perspective on the impact and effectiveness of government measures, an invaluable insight into the reality of the sector, and a credible voice in outreach efforts. The process also develops positive relationships between civil society and government which benefits the country long after our intervention ends.

REGIONAL AND GLOBAL ACTIVITIES

The EU Global Facility organises a diverse range of bilateral, regional and global studies, workshops and conferences to develop and implement best practices in protecting the financial integrity of the NPO sector.

As the project's portfolio grows through the years, the opportunities for bilateral and regional comparative studies is also growing. The team is increasingly able to bring together partners from different jurisdictions in various activities to learn from counterparts how best practice measures can be implemented.

127 NPOS WERE CONSULTED REPRESENTING **69** COUNTRIES.

At the regional level, we are working in close collaboration with the Secretariats of FATF-Style Regional Bodies to deliver awareness-raising events on Recommendation 8 to authorities and civil society representatives. These events help authorities integrate lessons learned by other jurisdictions into their own practices, improve their understanding of Recommendation 8 requirements and form a sustainable network of partners across their region and worldwide.

These regional forums culminated in a global event co-organised in September 2023 in Bonn, Germany with the GIZ and the Global NPO Coalition on FATF. It was attended by the FATF, FATF-Style Regional Bodies, national jurisdictions, NPO representatives, academia and the practitioners. These worldwide consultations are a testimony of the EU Global Facility's commitment to **fostering an inclusive and collaborative environment where NPOs from around the globe can voice their perspectives on regulatory evolutions and their impact on their work.**

“Working with the EU Global Facility -both bilaterally and through regional events- is of great importance for Indonesia as Recommendation 8 on NPOs is one of the most sensitive FATF Recommendations, with one of the lowest level of its compliance among countries. With this collaborative work, and the recently revised Recommendation and its Best Practices Paper, we hope that the situation will change positively.”

RICHARD RAMPAL
DIRECTOR OF THE FINANCIAL INTELLIGENCE UNIT
SEYCHELLES





MICROFINANCE

Bridging the gap between the private sector and civil society, microfinance institutions play a vital role in the economic development of societies and the alleviation of poverty. Therefore, their potential for ML/TF is extremely high yet too often ignored. While microfinance institutions have become increasingly scrutinised and subject to tighter risk and compliance standards, very little support has been provided to the sector.

Therefore, the EU Global Facility has developed a highly innovative work segment: the support to microfinance institutions in obtaining AML 30000 certification. Successfully implemented in Tunisia and Jordan with the respective AML 30000 certification of Enda Tamweel and Tamweelcom, the project will target microfinance institutions across the MENA region to later expand to local institutions in Africa, Asia and Latin America.

The objective of the project is to raise the level of AML/CFT compliance in the microfinance sector globally, thereby promoting microfinance institutions as reliable, vetted actors in the financial world.

“The recognition and acceptance that Enda Tamweel gained following its certification -both by the national environment and by the international financial ecosystem- have been remarkable.”

SEMIA RAGGAD
DIRECTOR OF GLOBAL RISK MANAGEMENT
AT ENDA TAMWEELS

How to receive technical assistance

In order to receive technical assistance from the EU GF-AML/CFT, **partner countries can submit requests for support to the EU Delegation in their country and/or to the European Commission, Service for Foreign Policy Instruments.** The European Commission will then assess requests, prioritise them and pass them on to the EU Global Facility.

Once received, the request will be examined by the EU Global Facility, which will coordinate with local authorities to propose technical assistance activities tailored to the specificities and circumstances of the country.

The EU Global Facility on AML/CFT is a demand-driven project: it responds to requests for technical assistance after they are formulated by countries.

If you are interested in receiving technical assistance, contact your local EU Delegation (full contact list is available [here](#)).



Reference list

List of References

- [Directive \(EU\) 2015/849 of the European Parliament and of the Council of 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing.](#)
- [European Commission's Service for Foreign Policy Instruments \(FPI\)](#)
- [DG Financial Stability, Financial Services and Capital Markets Union](#)
- [Financial Action Task Force](#)

The project is implemented by Expertise France in cooperation with the German Agency for International Cooperation (GIZ).



EXPERTISE FRANCE

Expertise France is the French public agency for the design and implementation of international technical cooperation projects which aim to contribute to the balanced development of partner countries, in line with the Sustainable Development Goals (SDGs) of the 2030 Agenda and the priorities of France's external action.

The agency operates in four priority areas:

- Democratic, economic and financial governance;
- Stability of countries in crisis/post-crisis situations and security;
- Fight against climate change and sustainable urban development;
- Strengthening of health systems, social protection and employment.

In these areas, Expertise France conducts engineering and implementation missions for capacity building projects, mobilises technical expertise and acts as a contractor for projects calling on public expertise and private know-how.



GIZ

As a service provider in the field of international cooperation for sustainable development, GIZ has over 50 years of experience. Through GIZ International Services (GIZ InS), it offers the full range of GIZ services to clients worldwide: the European Union institutions, the German Government, the bi- and multilateral donors and development banks, the private sector or other sovereign governments.

GIZ InS creates solutions that deliver immediate value, drawing on extensive experience to implement complex projects in sensitive environments. GIZ InS innovates and actively explores trends relevant to its clients. Clients and partners – including target groups – benefit from GIZ's technical expertise, its global presence, access to networks and dedicated international teams.

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