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and Norwegian Public Institutions, Local and Regional Authorities**

Project to strengthen anti-corruption and anti-money laundering systems in the Czech Republic

Communication Strategy for the FAU of the Czech Republic

Prepared by:
Sascha Oliver Rusch
Council of Europe Consultant

Adriana Vavrušková
Consultant of the Czech FIU

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For further information please contact:

Economic Crime and Cooperation Unit (ECCU)
Action against Crime Department
Directorate General of Human Rights and Rule of
Law-DG I, Council of Europe

Tel: +33-3-9021-4550
Fax: +33-3-9021-5650
e-mail: mustafa.ferati@coe.int
www.coe.int/corruption

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Abbreviations:

4th AML Directive	Fourth Anti Money Laundering Directive
AML Act	Act No. 253/2008 Coll. on selected measures against legitimization of proceeds of crime and financing of terrorism
AML/CFT	Anti-Money Laundering/Counter Financing of Terrorism
CNB	Czech National Bank
CoE	Council of Europe
CS	Communication Strategy
DNFBP	Designated Non-Financial Businesses and Professions
FATF	Financial Action Tasks Force
FAU	Financial Analytical Unit of the Ministry of Finance
MoF	Ministry of Finance
Q&A	Question and answers
RSS	Really Simple Syndication
SME	Small and Medium Enterprises
STR	Suspicious transaction report
WD	Work Day

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1 EXECUTIVE SUMMARY

This paper is prepared within the project to “Strengthen anti-corruption and anti-money laundering systems in the Czech Republic”, it provides an outline of a communication strategy to be utilised by the Financial Analytical Unit of the Ministry of Finance primarily to introduce the 4th EU Anti-Money Laundering (AML) Directive and its implementation in the Czech legislation, which is expected for mid-2016. The Communication Strategy (CS) proposes that this event is accompanied by information about the efforts of the Czech authorities in the fight against corruption and money laundering.

The CS contains a background on relevant facts on above-mentioned topics that can be used as information resource in preparing topic-related publications and activities.

This document is intended for internal use by the FAU and for sharing with relevant partners like Czech National Bank (CNB), business associations/ professional chambers and other interest groups that can be involved in introducing the new measures of the 4th EU AML Directive and the new amendment of the AML Act of the Czech Republic with the aim of raising awareness among relevant target groups.

The foreseen activities are:

- The production of information material
- The production and regular update of FAQs on the new AML amendment (within the first half year)
- The production of Guidance on AML amendment¹ with the main topic for **Guidance** (called "General Guidance for the implementation of new AML/CFT Law")
 - ⇒ The subtopics for guidance will be split tentatively in:
 - ⇒ 1. Guidance for the new approach for PEPs
 - ⇒ 2. Guidance for the Beneficial Ownership
 - ⇒ 3. Guidance for the Reduction of the limit of cash payments
 - ⇒ 4. Guidance for the Risk Based Approach (identification requirements and CDD)
 - ⇒ 5. Guidance for internal training
 - ⇒ 6. Information about the new role of FAU
- Conducting a national workshop with compliance officers of obliged entities
- The availability of FAU experts for internal training-events of obliged entities
- Reminding companies for updating IT/operational systems/ forms, information material etc.
- Conducting a press conference in early 2017 for the annual report, information on FAQs and the new FAU-definition
- Separate section within the official websites of the FAU – www.mfcr.cz/fau (Please see chapter 5.5)

¹ Above-mentioned information/ methods will be prepared by FAU and published on the FAU's websites. FAU will start with the preparation after the legislative process will be finished – The list of topics is tentative and updated/ changed when appropriate

2 INTRODUCTION

2.1 About the Communication Strategy

This CS is developed for the Financial Analytical Unit (FAU) of the Ministry of Finance (MoF) of the Czech Republic and shall be implemented by the MoF – and when possible: with support of the CNB. The strategy contains communication activities that can be introduced by the MoF itself without using external resources. It is not foreseen to outsource activities (for example by contracting external experts), all activities will be implemented by the FAU and eventually support by CNB or other public entities.

Communication channels will be the FAU/MoF homepage, a RSS feed to subscribers, a national workshop with compliance officers of obliged entities and the provision of FAQ's that will be regularly updated during the first half year.

The CS aims to implement two different kinds of activities:

- 1) Most sustainable and effective communication on the main points of the 4th AML Directive and relevant and related proposal for the amendment of the AML Act in the Czech Republic;
- 2) Image improvement of Czech authorities by giving account on efforts made in fighting against corruption and money laundering.

The CS provides a road map for informing all relevant target groups in the Czech Republic about the new rules and obligations stipulated in the amendment of the AML Act.

Target groups are very different. They are represented by the private sector, ranging from credit and financial institutions, ending second-hand dealers. The attention should be given more to specific groups. According to the last Annual Report of the FAU 70 % of the Suspicious Transaction Reports (STRs) come from the banking sector. Therefore banks are the most important target group. But all target groups have to be equally reached, which will be mainly done by a national workshop and the publication of guidance materials on the AML amendment on the FAU/ MoF homepage.

It is not intended to have special activities targeting the media. The reasons are to avoid biased reporting and insufficient coverage of the very specific AML regulations. Only in early 2017 the FAU will use a press conference for publishing the annual report of 2016 and to update on the AML amendment related frequently asked questions (FAQ) and to introduce in the new definition of the FAU.

2.2 Quality of information / distinction between employees and customers

FAU will distinguish between information/tasks for employees and for customers/clients. This information cannot be combined together. Information for the employees is not public.

The only “public” information FAU is going to be produced and published on its website will be leaflets with basic information in Czech, English and eventually other languages.

FAU may prepare just a guidance what information it is necessary to give to the employees or to the customers - obliged entities will have to prepare the detailed information products themselves (use own PR department, own design identity).

It is expected that obliged entities keep “classified” information in the internal communication system (intranet or internal communication system) and that the public information will be published via

leaflets and on web sites of obliged entities (like actualities, newsletters, like a part of the internet banking, information in branch offices etc.). Obligated entities can make some adaptations in relation to the proposed amendment of the AML Act (the proposed obligations can be strengthened by the obliged entity compared to the AML Act according for example to the need of their foreign "mother company" or its situation on the market).

2.2.1 Outline of suggested communication activities

The communication activities have been allocated to modules. Each module is containing one or more activities that are allocated to specific target groups. The following summary provides an overview of elements of the CS:

- ⇒ Develop guidance on several aspects of the new AML amendment
- ⇒ Launch an RSS-Feed to inform about guidance and updates on AML amendment (for example updated FAQs)
- ⇒ Provide easy to understand information on FAU website and develop a basic-facts leaflets (Please see chapter 5.5. with details on how obliged entities can sign in for receiving news where the Interpretative statements of the FAU will be presented, where and when the FAQ collection will be published online)
- ⇒ Provide “Frequently Asked Questions” (FAQ) on MoF website with regular updates (Target group: especially employees of the relevant companies)
- ⇒ Conduct a national workshop with compliance officers of obliged entities (100 PAX) with tailored group-work sessions for the different sectors
- ⇒ Availability of FAU experts for workshops of associations and chambers (obliged entities)
- ⇒ Long-Term: For early 2017 – hold a press conference about the annual report, frequently asked questions of the new AML regulations and to introduce the new FAU definition with positive messages about the new AML amendment

2.2.2 Timeframe for implementation

A detailed description of the timeframe for the implementation of the activities foreseen in the CS is provided within each of the modules foreseen for this task and in the Annexes with tables of activities for each target group. It is foreseen that all activities related to the CS will be completed by March 2017, though many of these activities such as the RSS Feed are a recurring activity and will also continue in the future independently after the end of the project.

3 OVERVIEW OF LEGISLATION AND INSTITUTIONAL ROLES

This chapter summarizes the main important information and distilled messages that shall be used in the communication campaign. The 4th AML Directive and the Proposal of the amendment of the Czech AML Act (for the implementation of this directive) will have concrete consequences for the business sector, public authorities and wide circles of the Czech economy. Therefore it is crucial to connect information about the changes with clear messages that all relevant target groups need to be aware of their obligations.

The acceptance and support of the AML amendment can be fostered by promoting positive aspects of the new and stricter regulations. The new AML law includes the broadening of the scope of Politically Exposed Persons (PEPs) and introduces the requirement for the registry of beneficial ownership, furthermore the Czech authorities are already undertaking measures to amend legislation in relation to financing of election campaigns, conflict of interest etc. which will finally help to strengthen the fight against corruption. A positive message would be as well that the AML amendment is part of the European harmonisation and an important instrument to fight against international terrorism.

Image Improvement

It is recommended to use the opportunity of the “actual” event when the amendment of the AML Act should come into force (expected July 2016) for providing information and raising the awareness of the general public about efforts made in fighting corruption and money laundering in the Czech Republic. This can be done in a very short form, for example a table-overview in a leaflet or 2 – 4 slides in a Power Point presentation. Eventually the MoF press department is able to motivate the media to take up the topic and report about those efforts made.

There will be no single campaign for image improvement targeted only on the amendment of the AML Act, but it should be part of a wider image improvement together with other efforts made with few other acts related to fight against corruption and money laundering. It is expected that this will lead possibly to an image improvement of involved Czech authorities and will also raise the trust into the rule of law. The MoF should emphasize to all experts involved in the communication activities that they should provide also some information about efforts made in fighting corruption and money laundering in their presentations.

3.1 Basic facts about Czech institutions

3.1.1 The FAU - The central authority for reporting suspicious transactions is the Financial Analytical Unit/Ministry of Finance;

The Financial Analytical Unit handles the Ministry's tasks resulting from special legal regulations on money laundering and financing of terrorism as well as from special legal regulations on the application of internal sanctions with a view to maintaining and restoring international peace and security, protecting human rights and combating terrorism (hereinafter referred to as 'international sanctions'), in response to measures adopted by the UN Security Council and EU institutions. It collects and analyses data on suspicious trades and conducts other activities resulting from the analyses. It provides for the execution of concept-oriented activity within its scope of competence; produces comprehensive proposals to develop and fine-tunes the system of action adopted to combat money-laundering and financing of terrorism and for the application of international sanctions in both nation-wide and international contexts. It produces draft Acts and implementing regulations falling under its scope of competence, including their harmonisation with EC/EU legal regulations and official positions of the Czech Republic on new draft of regulations and other EU documents. It contributes to the drafting of

EC/EU legal regulations. Within its respective scope of competence, the unit cooperates with international organisations, bodies in other countries having the same scope of authority, with central administrative authorities and legal entities. It issues decisions in administrative proceedings within its own scope of competence pursuant to special legal regulations and represents the MoF in administrative court proceedings. It organises trainings within its scope of authority²

3.1.2 The anti-money laundering regulators are FAU and CNB.

The 4th AML Directive brings a framework for harmonisation of national legislation of all 28 member states. The directive is a minimum standard, though member states implement stricter rules. In some respects, e.g. sanctions, its requirements are actually much more concrete than those of its predecessor.

3.2 PART I - Background on the 4th AML Directive

3.2.1 About the 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 Context

After more than two years of negotiations the European Council and the European Parliament adopted the 4th AML Directive, which was published in the Official Journal of the European Union on 5th June and entered into force on 25th June 2015.

As one of 28 member states the Czech Republic must transpose the new changes into its AML Act – **Act No. 253/2008 Coll. on selected measures against legitimization of proceeds of crime and financing of terrorism** within a period of two years.

The 4th AML Directive takes into account the latest recommendations of the Financial Action Task Force (FATF) from February 2012. The fundamental changes are related to the areas of the risk based approach (RBA), ongoing monitoring, beneficial ownership, customer due diligence, PEPs.

The new regulations will ensure greater effectiveness and will improve transparency with no legal loopholes for criminals and terrorists to slip through and abuse the financial system in the Czech Republic and the whole European Union.

The 4th AML Directive also contains new requirements for complying with the risk-based approach at state level. In future, every Member State must compile and maintain a national risk assessment. Furthermore, the European Supervisory Authorities will draft a joint opinion on the risks of money laundering and terrorist financing to the financial sector of the European Union. The opinion will be incorporated into a supranational risk report to be drafted by the EU Commission. The Directive also explicitly calls on national supervisory authorities to begin exercising a risk-based supervisory approach.

Czech Context - Legislation and Consequences

Currently the Czech Republic is preparing the amendment to the AML Act. It is expected that following its discussion by the government and the adoption in parliament the new law enters into force in mid-2016. This draft of the Proposal of the amendment of the AML Act also covers recommendations of the Council of Europe's Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL) from the last round of evaluation of the Czech Republic.

² (<http://www.mfcr.cz/en/about-ministry/organisation-chart/dane-a-cla-sekce-05/dept-24-financial-analytical-unit>).

3.3 PART II - Background fight against money laundering

In 1996 the Czech Republic adopted the Law No. 61/1996 Coll., on some measures against Legalization of proceeds from crime. From its effective date on 1st July 1996 the FAU was created within the MoF to build administrative model unit, whose task is to receive and analyse STRs sent by obliged entities.

After the European Parliament and Council Directive 2005/60/EC of 26th October 2005 on the prevention of the use of the financial system for the purpose of money laundering and terrorist financing, and the Commission Directive 2006/70/EC of 1st August 2006 laying down implementing measures for Directive 2005/60/EC as regards the definition of PEP and the technical criteria for simplified customer due diligence procedures and for exemption on grounds of a financial activity conducted on an occasional or very limited bases, came into effect, the Czech Republic made completely new anti-money laundering act - Act no. 253/2008 Coll. on selected measures against legitimization of proceeds of crime and financing of terrorism (“AML Act”), with effect from 1st September 2008 (it replaced all provisions of the previous AML Act).

This change in the Czech AML/CFT system was done in addition to two regulations adopted by the EU – regulation (EC) No. 1889/2005 on controls of cash entering or leaving the Community and regulation (EC) No. 1781/2006 on information on the payer accompanying transfers of funds.

The current AML Act also covers requests coming from the international treaties, such as the Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime (the so called Strasbourg Convention, 1990), which among other forms the basis for international exchange of information between partner financial units of signatory countries; and the International Convention for the Suppression of the Financing of Terrorism (1999), which requires from parties that have adhered to the convention to sanction as an offense all forms of financing of terrorism and take appropriate measures to identify, detect and freeze or seize any funds intended to finance terrorism.

In connection with the cases which occur in practice, FAU published three methodological guides on the application of international sanctions related to the financing of terrorism, and on access of obliged entities to digital currencies and on identification of beneficial owners by obliged entities.

Following the issuance of the revised 40 FATF Recommendations in February 2012, the FAU started to discuss with relevant state authorities the need to amend legislation, and began the preparatory work for the amendment of the current AML Act. Because the main focus of FATF recommendations is on risk based approach (RBA) FAU began in 2014 with the preparation on the national risk assessment which should in particular identify and describe AML/CFT risks across the system. The assessment would be based on recommendations to mitigate risks through both legislative and non-legislative measures and at the same time should be the basis for risk assessment for obliged entities. The assessment of risks, however, is not a one-time exercise, but a process which will be continuously developed and updated.

AML Act is supplemented by the Decree of the Czech National Bank No. 281/2008 Coll. which was newly amended in August 2014 to be in accordance with new international standards such as 40 Recommendation of Financial Action Tasks Force (FATF).

During 2013, and especially at the beginning of 2014, FAU prepared some formal modifications of the AML Act that reflect changes related to the new rules of the pension schemes, the new terminology in the field of investment of funds and, finally, new brought by introduction of the new Civil Code. FAU had during 2014 actively participated in the drafting of a new 4th AML Directive and related Regulation. It regularly attended meetings at EU working groups and promoted interests of the Czech Republic.

On 5 June, 2015 the new AML regulations were published in the Official Journal of the EU, specifically the Directive of the European Parliament and the Council (EU) 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing (amending Regulation (EU) No. 648/2012 of the European Parliament and of the Council, and repealing Directive 2005/60/EC of the European Parliament and of the Council and Commission Directive 2006/70/EC) and the Regulation (EU) 2015/847 on information accompanying transfers of funds. The 4th AML Directive contains a number of changes, such as the extension of the scope of the Directive by covering a wider segment of the gambling industry, lowering the threshold for identification and due diligence when dealing in cash from EUR 15.000 to EUR 10.000. Other changes included are the introduction of a new system of risk assessment at national level, the introduction of new measures to identify the beneficial owners of legal entities, in particular the obligation to establish a central register of beneficial owners of legal persons, the cancellation of equivalence of third countries and harmonization of administrative sanctions etc. One of the major changes in the regulation is the new obligation for payment service providers to ensure that the transfers of funds are accompanied in addition to the information on the payer also by basic information about the payee.

The requirements of the 4th AML directive were taken into account during the drafting of the amendment to the AML Act No. 253/2008 Coll. and other related laws in the Czech Republic. The proposed date for entering into force of the amended legislation is 1st July 2016.

3.4 Proposal for amendment of the Czech AML Act based on the 4th AML Directive

3.4.1 Risk Based Approach – Identification Requirements, Customer Due Diligence

There is a new EU (as well FATF) requirement to all the Member States to identify, assess, understand, and mitigate their AML/CFT risks. This will be achieved by way of the “**National Risk Assessment**”. Currently the FAU of the MoF of the Czech Republic takes work on this process.

RBA (Risk Based Approach) has an impact especially on the identification and customer due diligence (Section 7 and Section 9 of the amended AML Act). Under the former EU Directive, obliged entities were already required to take enhanced measures where the customer risk is considered greater, and could apply simplified measures where the risks were considered lower. The new 4th EU Directive prescribes minimum factors to be taken into account before applying **identification requirement** to a customer. Where there is a higher risk client identification will be carried out also in case of threshold lower than 1 000 EUR or will be used regardless the amount of the transaction (obliged entity would have an ability to set its own limit – less than 1 000 EUR).

Concerning the **customer due diligence** (Section 9) the scope and manner of information collected can be modified by risk assessment of the client, transaction, product, geography, channel etc. Newly obliged entities should not rely only on the information delivered by the customer; they need at least check this information through an independent source. Also obliged entities need to be able to keep

evidence why they have considered the risk to be low enough to apply simplified customer due diligence.

3.4.2 Politically Exposed Persons (PEPs)

The definition of PEPs will be extended to include also the **domestic** PEPs. Obligated entities will therefore need to review their customer registers to ascertain if they need to reclassify and apply customer due diligence to any existing customer as PEPs under the new definition, as well as apply these measures to new customers when entering into the business relationship.

There is also a new change – in the new amendment of the AML Act it is necessary to expressly provide for an obligation to identify whether the client is PEP (or the person against whom they are applied international sanctions).

3.4.3 Beneficial ownership

The new 4th AML Directive introduces an explicit requirement for legal persons, including companies and trusts, to hold adequate, accurate and current information on their own beneficial ownership. This information will be required to be accessible by competent authorities (the FAU) and obliged entities upon request. (This requirement will be also applied to trustees – newly defined in the proposal of amendment of the AML Act; they will be required to disclose their status to obliged entities).

3.4.4 Extension of the types of the obliged entities

There will be some new types of obliged entities. The new law added a more general designation **Provider of gambling services** (instead only Casinos) – this is with the regard to the new EU regulation on gambling effective from January 2016. In the context of the enlargement of the use of digital currencies (like Bitcoin, Litecoin, CzechCrownCoin etc.) a new type of the obliged entity was added – the **Person providing services to virtual currency**.

3.4.5 Reduction of the limit

The draft of the AML Act proposes to reduce the limit (threshold) of the cash payments for/between **entrepreneurs** from the previous 15 000 EUR to **10 000 EUR**. This would be important information for the businessman associations/chambers and for public.

3.4.6 Extension of Identification Data

The new law foresees that among the identification data (Section 5) of the customer is also included the following: contact phone number, fax number, e-mail address, profession of the client/customer, name of the employer etc.

3.4.7 Information accompanying transfers of funds

There is a new requirement for a payment service provider to ensure that the transfers of funds are accompanied in addition to information on the payer and recipient information. (This requirement comes from the new EU Regulation 2015/847 on information accompanying transfers of funds.)

3.4.8 E-Money

In relation to e-money, the law provides that it shouldn't be necessary to make the customer identification and customer due diligence with precisely defined e-money services (electronic money, payment services provided by means of a public mobile telephone network with strictly defined thresholds).

3.4.9 Rejection of Transaction

Obligated entity **must reject** a transaction when it is not able to meet (fulfil) the requirements for identification and customer due diligence (Section 15 of the amended AML Act).

3.4.10 System of Internal Rules

Obligated entity should make its own assessment according to risk factors, such as: risk factors related to clients, geographical area, products, services, transactions and channels. They have to conduct risk based approach and they also have to be able to keep evidence of the rationale behind the risk rating applied to each customer. (There is a proposal in Section 21a of the AML Act– stipulating that in case of its violation /this is considered failure to comply with the obligation for prevention, and the obliged entity can be fined up to 1 000 000 CZK).

3.4.11 New FAU Definition

A formal change of the definition of the FAU is included in the Proposal of the amendment of the AML Act – it defines the position and role of the FAU as an independent administrative body responsible for AML/CFT system in the Czech Republic. It is indicated as an Office Authority (not only as a part of the Ministry of Finance). There is also a completely new part about the control of activities of the FAU (control by a special body of the Czech Parliament).

As result of the proposed amendment of the AML Act there will be an increased requirement on obliged entities to ensure their good preparation for above mentioned changes, and also a need to set measures in place to train the staff, update policies, internal procedures and controls. This may also have an impact on the budget of concerned obliged entities.

3.5 PART III - Background on fight against corruption

According to the information published by Transparency International, the Czech Republic in 2014 was ranked in 53rd place, in the ranking of countries according to the Corruption Perception Index (with a rating 51 points, which is similar to the result of countries like Georgia, Malaysia, Samoa, Slovakia and Bahrain). Among 31 European countries the Czech Republic was ranked in the 25th place.

Even though the Czech Criminal Code (Act No. 40/2009 Coll.) does not use the notion "Corruption", this negative social phenomenon is punished primarily by offenses in the part called "Crimes against Public Order". In particular under Part 3 "Bribery" it is a criminal offense under Section 331 Accepting a bribe, Section 332 Bribery, Section 333 Indirect bribery. (Joint provision in Section 334 called "Common provisions" that defines the terms "bribe", "public officer" and "procurement matters of common interest".)

In July 2014 a **Government Council for the Fight against Corruption** was established in the Czech Republic. It is an advisory body to the Government of the Czech Republic in the field of combating corruption, which coordinates and evaluates issues of combating corruption (<http://www.korupce.cz/cz/rada-vlady/rada-vlady-pro-koordinaci-boje-s-korupci-121697/>).

This Council organizes activities according to the “Government policy for combating corruption for the years 2015 to 2017” and to the “Action Plan to combat corruption for the year 2015”. The Council makes an assessment of corruption risks in upcoming legislation. It is for the first time, that the Government Legislative Work Plan for 2015 expressly stated which legislative proposals will be discussed at the Council and will be subjected to its investigation. The Council examined in detail for example the draft of the “Act concerning the origin of assets”, implementation of “Civil Service Act”, the “Act on internal management procedure and control in public administration”, legislation framework for the financing of political parties and election campaigns, the “Act on Public Prosecution”, the “Act on Public Procurement Procedure”, protection of whistleblowers etc. The Council also covers activities related to regulation of lobbying activities, and also approves the draft Methodology for evaluation of anti-corruption measures and creates the opinions/statements of the Government Council for Coordination of the fight against corruption.

The current strategic directions of anticorruption policy in the Czech Republic are:

- Professionalization of public administration,
- Management of public property,
- Strengthening of anti-corruption tools in the private sector,
- Increasing the transparency of political parties,
- Investigation and prosecution of corruption,
- Strengthening anti-corruption climate in Czech society,
- Building capacities for monitoring corruption,
- Strengthening transparency in the public sector.

Also the Government presented in 2015 a draft law amending some electoral acts and other related acts. Therefore, the amendments which will have an impact on acts governing elections to the Parliament, the election of the President of the Republic, the regional council elections and elections to the European Parliament. There is a proposal to uniformly modify the rules of the election campaign and its financing, including the introduction of limits spending on election campaigns, establishment of a legal definition of the election campaign, addition of obligation among candidates to establish a transparent account designated for the financing of election campaigns and to delegate the control over the financing of the election campaign to the supervisory Authority for the management of political parties and political movements established by the Act No. 424/1991 Coll., on association in political parties and political movements.

Government Information Centre presents 10 main anti-corruption goals of the Czech Government:

- a. **Civil Service Act** - anticorruption effect lies in a clear definition of basic obligations of officials, depoliticizing of the civil service, reducing the risk corruption of officials and public employees; a new Civil service Act, published under No. 234/2014 Coll. which came into force on 1st January 2015, presents the new complex by regulating the relations between government employees (civil servants) and administrative offices;
- b. **Conflict of Interest Act** - a Government draft of the law amending the Act No. 159/2006 Coll., on conflict of interest, was prepared in 2015. This amendment to the Act on conflict of interests is one of the expected long-term anti-corruption measures prepared in accordance

with the government's Action Plan to combat corruption for 2015. The current proposal also follows the recommendations of the Group of States against Corruption (GRECO). GRECO has for long period drawn attention particularly to the lack of mechanism for enforcement of the obligations and lack of control mechanisms of conflicts of interest. The amendment mainly consolidates existing accounting bodies into one, creates a central electronic register of notifications, establishes the obligation of public officials to submit a notification on the date of commencement of their functions strengthens and extends the ban on competition and creates a new system of penalties depending on the seriousness of the infringement.

- c. **Act on Free Access to Information** - anticorruption effect lies in faster and easier public access to information, increases public control over decisions of public authorities, facilitates the identification of cases raising suspicions of corruption, in which property relations officials and public employees are manifestly disproportionate to their salaries. Submission of request for information to the Office for Personal Data Protection and its delivery is governed by Act No. 106/1999 Coll., On Free Access to Information, as amended.
- d. **uncovering of beneficial owners** - anticorruption effect stands on the transparency of legal relationships, in which on one side is a public authority and, on the other is a private entity applying for a public contract; in accordance with the implementation of 4th AML Directive two versions how to make the amendment of the “Act on public registers of legal and natural persons” are proposed - they differ about the extent of public access to the information about the beneficial owner;
- e. **protection of whistleblowers** - anticorruption effect is enhanced by protection for persons who report the criminal activity. The Government of the Czech Republic in its Programme Declaration committed to the adoption of a legislative solution to protect whistleblowers.
- f. **financial control and audit** - anti-corruption effect is increased by law enforcement in carrying out the law on financial control in public administration, improves financial control (management), improves management controls, improves internal audit and ensures the complete functional independence of internal audit,
- g. **State ownership policy** - anti-corruption effect stands in disallowing of implementation of contracts, projects and plans associated with corruption practices and disproportionately with high risks of corruption by state enterprises and state-owned companies. The Government proposes an act amending the Act No. 77/1997 Coll., On State Enterprise, as amended. The proposed legislation intends to define precisely the position, competences and responsibilities of directors and members of supervisory boards of state companies and bodies’ corporate relationships to their founders.
- h. **strategy and methodology of public “shopping”** - anticorruption effect is presented by more transparent management of public funds, including their predictable allocation,
- i. **Public Prosecution Act** - anti-corruption effect lies in better arrangement of the independence and accountability of prosecutors in criminal matters; in March 2015 the Minister of Justice and the Supreme Prosecutor’s Office of the Czech Republic agreed on a draft of the new Public Prosecution Act effective from 2017.
- j. **Anti-Corruption Program** - anticorruption effect is a systematic analysis of the issue of state corruption in the country.

Currently the preparatory activities for the creation of the document “Action Plan for Combating Corruption in 2016” are being held. The Ministry of the Interior in cooperation with Transparency International set up in the Czech Republic a free telephone anti-corruption line 199.

4 THE COMMUNICATION STRATEGY

4.1 Introduce the new Anti-money laundering and anti-corruption legislation

The FAU of the MoF is responsible for communicating the new anti-money laundering and the embedded anti-corruption legislation to all relevant target groups. The FAU is a small unit without communication officers and it has to implement all communication activities on its own. Therefore the development of the communication strategy was driven by the question, what FAU-experts are able to develop and deliver with own expertise and resources. There was also no clear budget foreseen for communication activities. It might be possible, that there are up to 20.000 EUR available for printing and disseminating communication material, but there was no decision taken on that when this CS was developed.

The foreseen communication activities will mainly focus on news and changes in the AML-directive. The topic anti-corruption should be mentioned within the Press conferences – but it cannot be prepared in details by FAU, because it is not the authority responsible for all anti-corruption measures. Discussing the AML-amendments-related anti-corruption measures should be one of the panels of the press conference that will be led by the Government Council for the Fight against Corruption who has the complete overview on this topic.

4.1.1 The CS embeds the following activities:

- A press conference about the AML amendments when they get into force
- Radio/news interview
- Development of website & content on AML-amendments
- FAQs on the FAU/MoF homepage with regular updates
- A RSS feed to subscribers to inform about AML news and updates of the FAQs
- Development of training material for AML-workshops with compliance officers
- A national workshop with compliance officers of obliged entities and the provision of FAQ's that will be regularly updated during the first half year.
- Discussion upon the Internal Procedure System
- Training for companies/annual training
- Basic information material

The communication activities are targeting

- The general public (communication channels: press conference, website of the FAU/MoF with general information about the AML amendments, radio/ news interviews), and
- Experts among all relevant target groups (compliance officers of obliged entities, etc. as described in the following chapter).

Besides the aim to inform about the AML-amendments it is foreseen to disseminate positive messages in regard to the changes – especially in regard to the topics presented in chapter 3.5 especially the bullet point list at the end.

4.2 Target-Group Analysis

The Annual Report of the FAU from 2014 indicated, that 70 % of the STRs come from banking sector. As stated - banks and related institutions are the most important target groups, besides all other

financial entities, as money laundering is dependent on the use of established financial instruments. This CS – as a consequence - concentrates its communication activities on them.

As the main target groups are credit and financial institutions the foreseen communication activities will be mainly on expert level (in distinction to laypeople-level, where provided information needs to be basic and by nature more superficial).

The target group related communication channels will be mainly the use of business associations/professional chambers, interest groups and other relevant groups for implementing joint information and training events. They all have their own publications and websites and they have their own pro-active policies to implement legislation in the financial sector. It is expected that the relevant entities will be strong allies in disseminating information about the 4th AML Directive and the related Czech AML legislation. A thorough description of target groups can be found as ANNEX 6.1

4.3 Obligated entities

Serious and organized crime is driven by the profit coming from illicit proceeds of crime, which goes back to the criminal networks. It is very important to detect, prosecute and destroy these networks. It is very important to seize and confiscate this dirty money as well. The new AML rules introduced in the 4th AML Directive help to this in more effective way. The text of this Directive fully takes into account the 40 Recommendation of FATF from 2012, AML/CFT international standards.

There are legal entities in private sector that are responsible due to the EU AML Directive as well as due to the Czech relevant AML Act. These legal entities – called “obliged entities” - should ensure under the AML Act full traceability of transfers of funds within, to and from the European Union.

The new legislation is supported by work on a national risks assessment, which is now being prepared by the FAU.

The work has to begin on the side of the obliged entities to ensure this new legal framework will be applied. The work of the obliged entities should focus on their effectiveness, transparency, on autonomy to make their own risk assessment and to use the risk based approach (RBA) especially to determine the risks on clients/customers, products, services, channels etc.

Obligated entities are set out in Section 2 of the AML Act³. The list is sorted by their importance (only for the purposes of this CS).

Note for Obligated Entities:

The obliged entity shall organize, at least once every 12 calendar month, training of all members of its staff who may, in the course of their professional obligations, come in contact with suspicious transactions. All appointees to such positions shall be trained prior to taking their appointment.

The obliged entity shall according to the AML Act establish and implement appropriate policies and procedures of internal control and communication to mitigate and manage effectively risks of money laundering and terrorist financing identified in the risk assessment. Credit and Financial institutions shall create a written system of internal rules, procedures and compliance check.

The main “private collaborators” who provide (among other activities) the preventive part of the fight against money laundering and terrorist financing are **CREDIT INSTITUTIONS:**

1. **Banks; and**
2. **Cooperative savings of credit union.**

Actually there are 47 banks (including foreign bank branches) in the Czech Republic; there are 11 credit unions, 14 representation of foreign banks; foreign financial and credit institutions and branches of foreign financial and there are 374 credit institutions providing cross-border services.

It is necessary to appoint that the above-mentioned institutions vary according to their profile, number of clients, private banking services, corporate banking services, products etc. All of these institutions must set the **contact person** (Section 22 of the AML Act) who is responsible to report suspicious transactions and to maintain regular contacts with the FAU. This is usually known as the “Compliance Department”. These departments are in close cooperation with the FAU.

5 COMMUNICATION ACTIVITIES

The following communication activities are organised in modules. Each module contains activities that are tailored for specific target groups.

Example for specific target groups:

One example: The **general public** would not understand detailed information. For laypeople it is sufficient to know that there are new rules on money laundering and that they have to answer certain questions of banks, insurances and other financial institutes, if they do business with higher amounts of money. The communication to the general public would therefore contain two messages: 1) There are new AML regulations; 2) if they apply to you please find additional information and examples on the websites of the MoF or CNB or at obliged institutions.

The AML amendments can be promoted by using “positive messages”:

The proposed AML amendment introduces measures for enhanced control related to PEPs and improves transparency on beneficial ownership. In addition there are developments in the country related to introducing/strengthening legislation on the conflict of interest and the financing of political parties, which both contribute to the improvement in the fight against corruption.

The target group “**compliance experts**” of banks and other financial institutes needs more detailed information, therefore the messages for them are: 1) The FAU provides a national workshop for compliance experts, 2) The FAU invites compliance experts to sign up for obtaining guidance on the AML amendment, regular updates on FAQ and other relevant information 3) The FAU provides guidance for obliged entities on conducting internal trainings, 4) The FAU provides important information on its website that can be used by obliged entities for free for producing of their own training material and information for their customers.

Expected Outcome

The FAU communication activities focus mainly on financial institutes. They are obliged entities and they have to provide training and information to their employees. Therefore it is expected that they will welcome and use the support of the FAU, for example by applying the guidance for training material that the FAU might develop.

Another important factor for raising the awareness on the AML law is the provision of appropriate information material to customers of financial institutes. They share the information with their customers, but how they do it cannot be influenced by the FAU.

Therefore it is important that the FAU addresses directly the expectations it has in regard to what the other sectors follow up - i.e. how and what can banks do to send the message out. As the banks regularly communicate with customers, the FAU could suggest to send to all customers a leaflet or brochure to notify about the changes in AML legislation (this would help to make the implementation less costly and more sustainable). Financial institutes should also post this information on their websites.

Follow-up activities FAU might request from financial institutes:

- **To become familiar with the new changes in the amendment of the AML Act;**
- **Relevant employees learn about the new changes;**
- **Set up automatized systems (if they use);**
- **Modify internal procedures;**
- **Provide trainings for staff;**
- **Modify relevant forms (web/paper form);**
- **Information leaflets for customers/clients.**

A table of activities foreseen to take place is presented below – the detailed timing in regard to target groups can be found in the annexes appended to this document

ACTIVITIES	DETAILS/SPECIFICATIONS
Press conference	General press releases; press, newspapers, magazines etc.; commentary to the Annual Report 2016
Training for companies/national workshop/annual training (participation of the experts of FAU/CNB)	Designed for participants from the “Compliance” department of institutions and representatives of professional chambers/associations Goal: became familiar with the new changes in the amendment of the AML Act and inform relevant persons about the new changes (even the top management)
Training material (prepared by FAU/CNB)	Written/electronic version, general form
Basic Information material (prepared by FAU)	Leaflet (an electronic version)
Radio/news interview	Press office of MoF, experts from FAU
FAQs	FAU task: published on the web of FAU; possible issue of the publication with the main FAU’s statements
National workshop/round table	Two-day workshop, split into individual round tables according to the types of obliged entities; Participants: representatives of Compliance departments of obliged entities and representatives from professional chambers/associations
Internal training	Training for staff of the obliged entities or members of professional chambers/associations
Discussion upon the Internal Procedure System	requirements on the modification of the IT/operational systems of the obliged entity, set up automatized systems; modify internal procedures; modify relevant forms (web/paper form); control by FAU/CNB of preparedness if the systems set up and are used properly

5.1 Guidance for companies

The goal of this activity is “Offering a low threshold” for companies in providing training on the new AML law. Companies can use for free the FAU guidance – for example on how to develop training material for their employees – this saves time and money for the companies. The links are accessible for everybody with Internet connection – this allows the employees to access them also on their own initiative. Furthermore companies that are not organised in business associations have access to information and guidance on how to develop training material they can use without further costs (for example small and medium enterprises that are not organised in associations).

Module 1: Develop guidance for obliged entities							
Description/ Objectives	<p>Develop guidance on the AML amendments that can be used from companies for example to train their employees on the proposal of the amendment of the AML Act of Czech Republic. The guidance contains</p> <p>Guidance (called "General Guidance for the implementation of new AML/CFT Law") The subtopics for guidance will be split tentatively in:</p> <ul style="list-style-type: none"> ⇒ 1. Guidance for the new approach for PEPs ⇒ 2. Guidance for the Beneficial Ownership ⇒ 3. Guidance for the Reduction of the limit of cash payments ⇒ 4. Guidance for the Risk Based Approach (identification requirements and CDD) ⇒ 5. Guidance for internal training ⇒ 6. Information about the new role of FAU <p>THIS GUIDANCE MATERIAL IS FOR EMPLOYEES ONLY, NOT FOR DISSEMINATION AMONG THE PUBLIC</p> <p>Objectives:</p> <ul style="list-style-type: none"> • Companies have access to standardised information on the AML amendments (for example for developing training material for their employees) • Provide free access to guidance on several aspects of the AML amendments • Companies sign up for RSS feeds about AML amendment FAQ's and to obtain guidance on how to develop training material for internal training 						
Steps to take (Activities)	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Activity 1.1 (05/ - 06 2016)</td> <td>Develop guidance (information material) on the AML amendments</td> </tr> <tr> <td>Time frame:</td> <td>Beginning 2 months before the new amendment of the AML Act of Czech Republic passes the parliament</td> </tr> <tr> <td>Expected Outcome:</td> <td> <ul style="list-style-type: none"> • Obligated entities are informed about available guidance on AML amendments • Obligated entities can use FAU guidance on developing training material for their employees </td> </tr> </table>	Activity 1.1 (05/ - 06 2016)	Develop guidance (information material) on the AML amendments	Time frame:	Beginning 2 months before the new amendment of the AML Act of Czech Republic passes the parliament	Expected Outcome:	<ul style="list-style-type: none"> • Obligated entities are informed about available guidance on AML amendments • Obligated entities can use FAU guidance on developing training material for their employees
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Time frame:	Beginning 2 months before the new amendment of the AML Act of Czech Republic passes the parliament						
Expected Outcome:	<ul style="list-style-type: none"> • Obligated entities are informed about available guidance on AML amendments • Obligated entities can use FAU guidance on developing training material for their employees 						

	<p>What FAU want the institutions to do:</p>	<ul style="list-style-type: none"> • To become familiar with the new changes in the amendment of the AML Act; • Relevant employees learn about the new changes; • Set up automatized systems (if they use); • Modify internal procedures; • Provide trainings for staff; • Modify relevant forms (web/paper form); • Information leaflets for customers/clients.
	<p>What to do:</p>	<p>Develop Guidance (called "General Guidance for the implementation of new AML/CFT Law") The subtopics for guidance will be split tentatively in:</p> <ul style="list-style-type: none"> ⇒ 1. Guidance for the new approach for PEPs ⇒ 2. Guidance for the Beneficial Ownership ⇒ 3. Guidance for the Reduction of the limit of cash payments ⇒ 4. Guidance for the Risk Based Approach (identification requirements and CDD) ⇒ 5. Guidance for internal training ⇒ 6. Information about the new role of FAU <ul style="list-style-type: none"> • Upload guidance information material to FAU/ MoF and CNB website • Inform business associations and companies by email or RSS feed about available guidance • Eventually contact the most important associations and chambers to ask for their support (for example in sending the link to the FAU RSS FEED to their members)
	<p>What kind of expert needed</p>	<ul style="list-style-type: none"> • FAU experts • Designer (Lay out of guidance information material/ MoF press department can assist)
	<p>How many work days (WD) needed</p>	<ul style="list-style-type: none"> • About 10-12 WD per 3-5 pages guidance, there should be one guidance for each of 6 points mentioned above • 1 WD designer for each of the 6 guidance papers
	<p>Expected costs</p>	<ul style="list-style-type: none"> • No costs expected, all material disseminated via Internet / RSS FEED/ emails

5.2 Communication to reach the public, non-organised business

The following module contains several activities to reach out to the general public and other target groups that cannot be reached through business associations – for example non-organised SMEs – or individuals, that do one-time business with higher amounts of money or businesspeople that cross borders or foreigners that come to or live in Czech Republic.

These target groups need to be informed about the new AML amendments and how they apply to their cases.

In addition to that the FAU sees diplomats of the Ministry of Foreign Affairs also as a target group. Providing them information on the AML amendment would increase their ability to answer questions properly when they are on mission or meeting foreign guests.

In relation to foreign countries: FAU will prepare a general information leaflet about the AML/CFT law applied in the Czech Republic and about the Czech efforts in fighting ML and Corruption. Ministry of Foreign Affairs will put this information (in EN or other language versions) on its website to information about the Czech Republic and will disseminate this leaflet to embassies and representations acting in the Czech Republic. Time frame: 5-6/16.

In relation to the Czech public: FAU will prepare a general information leaflet about the new development in the fight against ML/TF and corruption and about the new role of FAU. It will publish this information on its website/website MoF and disseminate this notice to the Government Office, Czech National Bank, Ministry of Trade, Commission against the Corruption and other relevant State Authorities and to the Professional Association and Chambers of relevant obliged entities. Time frame: 5-6/16

Module 2: Information to the general public / Image-improvement of involved institutions	
Description/ Objectives	<p>Produce easy understandable material for the general public, SME's that are not easy to access and eventually the Czech diplomatic service.</p> <p>The material includes information about fighting corruption and money laundering where to obtain further information.</p> <p>Suggested messages</p> <ul style="list-style-type: none"> • “There are new regulations against money laundering – inform yourself, if they apply to you.” • You find additional information here: (Websites MoF and CNB with Links) and for information material for download here: (Link – PDFs for download)” • POSITIVE MESSAGES: <ul style="list-style-type: none"> ○ The AML amendment provides stricter control to PEPs, improves transparency of beneficial ownership and conflict of interest, improves fight against corruption, and provides better control to finance of political parties. <p>All information materials contain an information box about efforts made in fighting corruption and money laundering.</p> <p>Objectives:</p> <ul style="list-style-type: none"> • The general public informed about new regulations on AML • The general public informed where to find more information • Positive messages promote usefulness of AML amendment and foster the acceptance

	<ul style="list-style-type: none"> • The general public informed about efforts made by institutions of the Czech Republic to fight corruption and money laundering • The Czech diplomatic service ability to provide concrete and correct information to foreigners in and outside the Czech Republic. 								
Steps to take (Activities)	<table border="1"> <tr> <td data-bbox="458 349 799 573"> Activity 2.1 (MAY – June 2016) </td> <td data-bbox="799 349 1410 573"> FAU experts develop information material for the public, SME, travellers, foreigners, business that are not organised in professional associations). FAU experts provide information on the AML-amendment to the Czech diplomatic service </td> </tr> <tr> <td data-bbox="458 573 799 685"> Time frame: </td> <td data-bbox="799 573 1410 685"> 2 months before the new amendment of the AML Act of Czech Republic passes the parliament </td> </tr> <tr> <td data-bbox="458 685 799 1122"> Expected Outcome: </td> <td data-bbox="799 685 1410 1122"> <ul style="list-style-type: none"> • Fulfil obligation to inform the public about AML amendments • Provide transparency about AML amendment • Reach out to SMEs that are not easy to access • Promote new regulations with positive messages • Prepare the ground for promoting the new FAU definition • Czech diplomatic service able to provide AML-amendment related information to foreigners in and outside the Czech Republic. • <u>REMARK: Bigger companies and business associations will be reached by training events for compliance experts (see below)</u> </td> </tr> <tr> <td data-bbox="458 1122 799 1993"> What to do: </td> <td data-bbox="799 1122 1410 1993"> <ul style="list-style-type: none"> • Tailor information material to target groups <ul style="list-style-type: none"> ○ 1 general e-leaflet (PDF on website) with basic information and where to get more information (e.g. MoF and CNB website, etc.) ○ 1 e-leaflet for SMEs to raise awareness about new amendment of the AML Act (when you do this and that you fall under AML Act/ where to get detailed information) ○ 1 e-leaflet for travellers in Czech and English ○ In relation to foreign countries: FAU will prepare a general information leaflet about the AML/CFT law applied in the Czech Republic and about the Czech efforts in fighting ML and Corruption ○ Ministry of Foreign Affairs will put this information (in EN or other language versions) on its website • Put text of AML Act on website of MoF & CNB in Czech and English • FAQ on websites of MoF & CNB continuously updated (first half year) • Leaflets contain also information about efforts made in fighting corruption and AML • All leaflets contain URLs where to find further information. </td> </tr> </table>	Activity 2.1 (MAY – June 2016)	FAU experts develop information material for the public, SME, travellers, foreigners, business that are not organised in professional associations). FAU experts provide information on the AML-amendment to the Czech diplomatic service	Time frame:	2 months before the new amendment of the AML Act of Czech Republic passes the parliament	Expected Outcome:	<ul style="list-style-type: none"> • Fulfil obligation to inform the public about AML amendments • Provide transparency about AML amendment • Reach out to SMEs that are not easy to access • Promote new regulations with positive messages • Prepare the ground for promoting the new FAU definition • Czech diplomatic service able to provide AML-amendment related information to foreigners in and outside the Czech Republic. • <u>REMARK: Bigger companies and business associations will be reached by training events for compliance experts (see below)</u> 	What to do:	<ul style="list-style-type: none"> • Tailor information material to target groups <ul style="list-style-type: none"> ○ 1 general e-leaflet (PDF on website) with basic information and where to get more information (e.g. MoF and CNB website, etc.) ○ 1 e-leaflet for SMEs to raise awareness about new amendment of the AML Act (when you do this and that you fall under AML Act/ where to get detailed information) ○ 1 e-leaflet for travellers in Czech and English ○ In relation to foreign countries: FAU will prepare a general information leaflet about the AML/CFT law applied in the Czech Republic and about the Czech efforts in fighting ML and Corruption ○ Ministry of Foreign Affairs will put this information (in EN or other language versions) on its website • Put text of AML Act on website of MoF & CNB in Czech and English • FAQ on websites of MoF & CNB continuously updated (first half year) • Leaflets contain also information about efforts made in fighting corruption and AML • All leaflets contain URLs where to find further information.
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What to do:	<ul style="list-style-type: none"> • Tailor information material to target groups <ul style="list-style-type: none"> ○ 1 general e-leaflet (PDF on website) with basic information and where to get more information (e.g. MoF and CNB website, etc.) ○ 1 e-leaflet for SMEs to raise awareness about new amendment of the AML Act (when you do this and that you fall under AML Act/ where to get detailed information) ○ 1 e-leaflet for travellers in Czech and English ○ In relation to foreign countries: FAU will prepare a general information leaflet about the AML/CFT law applied in the Czech Republic and about the Czech efforts in fighting ML and Corruption ○ Ministry of Foreign Affairs will put this information (in EN or other language versions) on its website • Put text of AML Act on website of MoF & CNB in Czech and English • FAQ on websites of MoF & CNB continuously updated (first half year) • Leaflets contain also information about efforts made in fighting corruption and AML • All leaflets contain URLs where to find further information. 								

	What kind of expert needed	<ul style="list-style-type: none"> • Legal expert (FAU) • Designer (Lay out of leaflets, eventually supported by MoF PR department)
	How many work days (WD) needed	<ul style="list-style-type: none"> • 2 WD for legal expert • 1 WD designer
	Expected costs	<ul style="list-style-type: none"> • Printing costs, if leaflets shall be printed

5.3 National Workshop

It can be taken as a matter of fact that compliance experts of financial/credit institutions are able to acquire the knowledge about the new AML law on their own. Nonetheless the FAU can provide a low-threshold support to those officers who are responsible for applying the AML regulations within the business activity of their companies. A crucial step of support is the production of FAU guidance for developing training material on the new AML amendment and the regular update of FAQs.

These workshops are also addressed to all relevant business associations that are crucial to disseminate information on the new AML law.

The National Workshop will be conducted shortly after the AML amendment become effective presumably in July 2016. The number of participants will be around 100, most of them compliance officers or other relevant representatives of obliged entities. The participation will be free of charge. The budget for venue-rent and catering might come from the Norway grants or bilateral funds (CoE).

Workshop duration: 2 - 2.5 days. After a joint session with all participants the workshop splits up into group-works, the discussions and presentations will be tailored to the needs of the specific target groups. This will be followed with a joint closing session of all participants with a summary and presentation of group work results.

For the Attention of FAU:

- Use positive messages (the AML amendment provides stricter control to PEPs, improve transparency on beneficial ownership and conflict of interest, improve fight against corruption, better control to finance of political parties). Positive messages foster the acceptance of the AML amendment and strengthen the position of compliance officers within their institutions.
- Remind participants that they have to update IT/operational systems/ forms, websites, information products etc.
- Inform the participants of available guidance on the AML amendment (incl. guidance on how to develop training material for employees).

Module 3: National workshop with compliance experts of obliged entities

Description/ Objectives	<p>Objectives:</p> <ul style="list-style-type: none"> • To inform compliance experts of obliged entities about the AML amendment and sensitize them for the changes • To inform about FAU-guidance (incl. guidance on how to develop training material for employees) • To inform about regular updates of FAQs and information material that can be used for free by obliged entities
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	<ul style="list-style-type: none"> To foster the acceptance of the AML amendment (positive messages) To raise the awareness about the new FAU-definition To remind obliged entities to update their websites, forms, information material etc.
Activity 3.1 Sep. 2016	<p>FAU conducts a national workshop in Prague for compliance officers of obliged entities</p> <ol style="list-style-type: none"> Banking sector Investment sector Leasing & finance sector Insurance sector Auditors, tax advisors, chartered accountants Licensed executors, public notary, lawyers, trust funds others
Time frame:	Two months after AML amendment gets into force
Target Groups	All obliged entities
Expected Outcome:	<ul style="list-style-type: none"> Compliance experts well informed about new AML law Compliance experts aware of Guidance on AML amendment available on FAU/ MoF homepage Raised acceptance of AML amendment Obliged entities use the FAU guidance for example for producing training material for their employees) Obliged entities update their websites, forms, information material, etc.
What to do	<ul style="list-style-type: none"> Prepare national workshop Identify participants and invite them to the workshops via business associations and RSS FEED Organise workshops (incl. catering) Prepare workshop material Conduct workshop
What kind of expert needed	<p>FAU, CNB experts (KEEP IN MIND FOR EACH GROUPWORK ANOTHER EXPERT REQUIRED)</p> <p>Secretariat of FAU for logistics</p>
How many work days (WD) needed (approx.)	<p>4 WD preparation of training material and presentation for each expert</p> <p>2 WD Conduct workshop (for each expert)</p>
Expected costs	<ul style="list-style-type: none"> Printing costs of information material Venue costs, catering, etc.

5.4 Press conference (early 2017) / FAU – New Definition

A press conference in early 2017 shall finalise the FAU communication activities on the AML-amendment. The press conference will be conducted for publishing the *Annual Report* (for the year 2016), inform about the first half-year of the AML-amendment and the knowledgebase (FAQs) the FAU has prepared so far. In addition to that the press conference will be also used for informing about and promoting the new definition of FAU. The information material and FAQs and guidance the FAU has developed so far will remain on the website.

Module 4: 2017 Press conference															
Description/ Objectives	Conduct a press conference for publishing the <i>Annual Report</i> Objectives: <ul style="list-style-type: none"> • To provide transparency on FAU activities • To update on the AML-amendment related FAQs • To inform about and promote the new definition of FAU 														
Steps to take (Activities)	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Activity 4.1 (Jan - Feb 2017)</td> <td>Conduct a press conference for publishing the <i>Annual Report</i></td> </tr> <tr> <td>Time frame:</td> <td>Early 2017, preparation starts in November 2016.</td> </tr> <tr> <td>Target Groups</td> <td> <ul style="list-style-type: none"> • All financial media outlets in CR • All media with financial reporting • National and regional media with financial reporting </td> </tr> <tr> <td>Expected Outcome:</td> <td> <ul style="list-style-type: none"> • Annual report (for 2016) is published with media attention • FAQs are publically acknowledged • New definition of FAU is made public, transparency provided • Positive messages of AML amendment promoted </td> </tr> <tr> <td>What to do:</td> <td> <ul style="list-style-type: none"> • Identify relevant media/ journalists and invite them to press conference • Prepare press release • Prepare press kit (with relevant information) • PR dept. checks the material for readability and easy language • Always ask media to publish the URL to MoF and CNB websites for further information </td> </tr> <tr> <td>What kind of expert needed</td> <td> <ul style="list-style-type: none"> • FAU expert • Designer (Lay out of press kit) • MoF Press dept. </td> </tr> <tr> <td>How many work days (WD) needed</td> <td> <ul style="list-style-type: none"> • 2 WD for FAU experts for preparing the press conference. • 1 WD designer (layout of press kit) • 4 WD secretariat for logistics </td> </tr> </table>	Activity 4.1 (Jan - Feb 2017)	Conduct a press conference for publishing the <i>Annual Report</i>	Time frame:	Early 2017, preparation starts in November 2016.	Target Groups	<ul style="list-style-type: none"> • All financial media outlets in CR • All media with financial reporting • National and regional media with financial reporting 	Expected Outcome:	<ul style="list-style-type: none"> • Annual report (for 2016) is published with media attention • FAQs are publically acknowledged • New definition of FAU is made public, transparency provided • Positive messages of AML amendment promoted 	What to do:	<ul style="list-style-type: none"> • Identify relevant media/ journalists and invite them to press conference • Prepare press release • Prepare press kit (with relevant information) • PR dept. checks the material for readability and easy language • Always ask media to publish the URL to MoF and CNB websites for further information 	What kind of expert needed	<ul style="list-style-type: none"> • FAU expert • Designer (Lay out of press kit) • MoF Press dept. 	How many work days (WD) needed	<ul style="list-style-type: none"> • 2 WD for FAU experts for preparing the press conference. • 1 WD designer (layout of press kit) • 4 WD secretariat for logistics
Activity 4.1 (Jan - Feb 2017)	Conduct a press conference for publishing the <i>Annual Report</i>														
Time frame:	Early 2017, preparation starts in November 2016.														
Target Groups	<ul style="list-style-type: none"> • All financial media outlets in CR • All media with financial reporting • National and regional media with financial reporting 														
Expected Outcome:	<ul style="list-style-type: none"> • Annual report (for 2016) is published with media attention • FAQs are publically acknowledged • New definition of FAU is made public, transparency provided • Positive messages of AML amendment promoted 														
What to do:	<ul style="list-style-type: none"> • Identify relevant media/ journalists and invite them to press conference • Prepare press release • Prepare press kit (with relevant information) • PR dept. checks the material for readability and easy language • Always ask media to publish the URL to MoF and CNB websites for further information 														
What kind of expert needed	<ul style="list-style-type: none"> • FAU expert • Designer (Lay out of press kit) • MoF Press dept. 														
How many work days (WD) needed	<ul style="list-style-type: none"> • 2 WD for FAU experts for preparing the press conference. • 1 WD designer (layout of press kit) • 4 WD secretariat for logistics 														

5.5 RSS FEED / Collaboration with associations and chambers

Considering that the FAU will not have support by the MoF press department (only eventually in designing the publications), the best approach would be that the FAU will have very basic outreach and communication activities.

The FAU will mainly use an RSS FEED to inform the target groups and invite for example relevant compliance officers and invite them to sign up the AML-amendment related communication.

It was discussed that the FAU will at first approach associations and chambers to find support in contacting their members. The associations can contact their members via email or on their websites and inform them about the website, where to sign up for receiving relevant information (www.mfcr.cz/fau).

Another way to contact associations and their members would be to disseminate the messages (see above) about the AML amendment on their annual workshops with participation of FAU experts. Concrete suggestions are not made in this CS as the FAU is constantly in contact with their target groups.

5.5.1 The purpose of RSS-Feeds

The FAU will use mainly its website together with the website of the Project CZ10 (www.cz10.cz) for publishing and updating information on the AML-amendment.

The easiest and most efficient way is to use the RSS-Feeds. This requires that obliged entities need to sign in for receiving RSS-news and updates.

The FAU will use this channel to present the Interpretative Statements and to publish the FAQ collection (Timing: presumably half a year after the AML-amendment got into force).

5.5.2 Introduction to RSS

RSS has no "official" name - it is most commonly used as "Really Simple Syndication", its origin comes from "RDF Site Summary" and "Rich Site Summary". The XML-based RSS files are completely independent from any platform (like Windows, Mac, Linux). RSS has been developed for publishing diverse content and updates to subscribers without time-delay. As soon as RSS-indicated content is published and changed subscribers are informed - this means for publishers that they are enabled to syndicate data automatically. Subscribers of RSS feeds have the possibility to follow any changes that are made on a website in real-time. RSS feeds offer advantages in easy and quick updates and time saving - as it is no longer necessary to open websites for checking updates. Once a change or addition is carried out in the selected sites, the user automatically receives a message.

5.5.2.1 How to subscribe to an RSS feed?

RSS or XML-feeds can also be used with browsers or E-Mail-Clients, but it is more convenient to use special apps (RSS-reader, news-reader or feed-reader).

RSS - Newsfeeds are usually characterized by an orange button labelled "XML" or "RSS". Clicking on this icon or a link like "RSS feed" usually leads directly to the RSS file. Simply copy the link on the right mouse button or the browser URL field and paste it into your RSS reader.

5.5.2.2 Available RSS-Reader:

For Windows-Operating System

⇒ Juice

⇒ RSSOwl (English)

For Mac OS X

⇒ NewsFire (RSS-Reader with Podcast-functionality)

⇒ iTunes

⇒ Vienna (English)

⇒ RSSOwl (English)

For Linux

⇒ gPodder (Python PodCatcher with GTK + GUI)

⇒ Newsbeuter (Kommandozeilen-Newsreader)

⇒ RSSOwl (English)

5.5.2.3 How can an operator of a website offer RSS feeds?

There are three ways to offer RSS feeds on homepages or blogs:

1. Website operators who have knowledge of HTML and want to use a dynamic solution (without the need for manual processing of the respective RSS file) it is required to use a RSS generator. Most Popular RSS generators include TNG and RSSify.

2. Website operators without HTML knowledge have the ability to create an RSS feed manually. This works most easily via a RSS editor. Those who are familiar with the RSS specifications can apply an ASCII / text editor to create a manual RSS feed. However, these variants have the disadvantage for the website operator that the RSS file is not updated automatically. After each amendment or supplement this change needs to be updated separately in the RSS file the website operator.

3. An alternative is to use a blog tool, which is generated through RSS feeds. WordPress is one of the most popular blog tools. In Moes weblog wiki is another choice of weblog providers.

Module 5: RSS-Feed	
Description/ Objectives	<p>Provide tailored information online. The FAU will use RSS-Feed on its website to provide AML-amendment related information to specific target groups</p> <p>Objectives:</p> <ul style="list-style-type: none">• To establish a central channel for obliged entities for obtaining news from the FAU in regard to the AML-amendment• To present <i>Interpretative Statements</i> about the AML-amendment• To update on the AML-amendment related FAQs
Steps to take (Activities)	<p>Activity 5.1 (May 2016 - Feb 2017)</p> <ul style="list-style-type: none">Establish RSS-FeedDisseminate information to obliged entities about RSS-FeedUpdate RSS FEED

	Time frame:	Preparation starts when law passes the parliament Update until 6 months after AML-amendments got into force
	Target Groups	<ul style="list-style-type: none"> All target groups (see ANNEX 1)
	Expected Outcome:	<ul style="list-style-type: none"> Obligated entities are aware of RSS feed A high number of obliged entities sign up for RSS feed <i>Interpretative Statements</i> are published via RSS feed FAQs are published via RSS feed (regularly updated, final update half a year after AML-amendment gets into force)
	What to do:	<ul style="list-style-type: none"> Prepare the website content* Establish the RSS Feed (see 5.5.2.3 How can an operator of a website offer RSS feeds?) Ask business associations and chambers to inform about RSS Feed on MoF/FAU website and how to sign up for news-updates on the AML amendment <i>Interpretative Statements</i> published via RSS feed Implement contact form (1. User must get a confirmation that his/ her email was sent to FAU, 2. FAU should answer within a certain time/ suggestion: within a week) FAQ and answers published via website Ask other institutions to link to FAU-website (line-ministries, customs services, border guards, other related institutions, business associations and chambers, etc.) <p>-----</p> <p>Content of website</p> <ol style="list-style-type: none"> Contact details of FAU Contact form, if questions about AML-amendment arise All produced information on AML-amendment like guidance, FAQs, etc. (You should start with basic FAQs from the beginning that will be updated during the time-frame of this activity) <i>Interpretative Statements</i>
	What kind of expert needed	<ul style="list-style-type: none"> FAU experts Website-Designer (not necessary, when you can use an existing content management system)
	How many work days (WD) needed	<ul style="list-style-type: none"> 3 WD for FAU experts (3 WD designer – only when a new website)

6 ANNEXES

6.1 ANNEX 1 - Target groups – Obligated entities

List of target groups

Target groups - general	Specific target groups	Goals for the institutions / What we want the institutions to do
<p>Banks</p>	<p>The main “private collaborators” who provides (among other activities) the preventive part of the fight against money laundering and terrorist financing are CREDIT INSTITUTIONS:</p> <ol style="list-style-type: none"> 1. Bank, 2. Cooperative savings of credit union. <p>Actually there are 47 banks (including foreign bank branches) in the Czech Republic; there are 11 credit unions, 14 representation of foreign banks; foreign financial and credit institutions and branches of foreign financial and credit institutions providing cross-border services there are 374.</p> <p>It is necessary to appoint that the above mentioned institutions vary according to their profile, number of clients, private banking services, corporate banking services, products etc. All of these institutions must set the contact person (Section 22 of the AML Act) who is responsible to report suspicious transactions and to maintain regular contacts with the FAU. This is usually known as the “Compliance Department”. These departments are in close cooperation with the FAU.</p> <p>There is a Czech Banking Association (https://www.czech-ba.cz/en). One of the main activities of this Association is to participate in the standardization of the banking practices and to support the harmonization of the banking laws with the EU legislation. As a part of the Association there works also the security committee, platform of people (com-</p>	<ul style="list-style-type: none"> • Become familiar with the new changes in the amendment of the AML Act; • Learn about the new changes (relevant persons - even the top management); • Set up automatized systems; • Modify internal procedures; • Provide trainings for staff; • Modify relevant forms (web/paper form); • Undertake to disseminate information leaflets for customers, through websites, or other standard communication channels used by the banks.

Target groups - general	Specific target groups	Goals for the institutions / What we want the institutions to do
	<p>pliance officers) coming from Compliance departments from banks and representatives from FAU and CNB. “Credit institutions” are subject to control provided by FAU and CNB (http://www.cnb.cz/en/index.html).</p>	
<p>Financial Institutions - Investment</p> <ol style="list-style-type: none"> 1. Central depository, 2. An administrator of investment tools market, 3. A person licensed to provide investment services (with the exception of an investment broker), 4. An investment company, a self-managed investment fund, a central administrator of the investment fund, a pension company , 5. A payment institution, a provider of small extent payment services, an electronic money institution and an issuer of electronic money of small extent 	<ul style="list-style-type: none"> • Czech Capital Market Association • Czech Private Equity & Venture Capital Association • The Association of Pension Funds of the Czech Republic • Czech Chamber of Commerce • Central Securities Depository Prague • Czech Stock Exchange 	<ul style="list-style-type: none"> • Become familiar with the new changes in the amendment of the AML Act; • Learn about the new changes (relevant persons - even the top management); • Set up automatized systems (if they use); • Modify internal procedures; • Trainings for staff; • Modify relevant forms (web/paper form); • Information leaflets for customers/clients.
<p>Financial Institutions - Insurances</p> <p>An insurance or re-insurance company, an insurance agent or an insurance settlement agent performing activities related to life insurance (with the exception of an insurance agent whose liability for damage is borne by their contracting insurance company)</p>	<p>There are 54 insurance companies in the Czech Republic (foreign branches included), 1 re-insurance company.</p> <ul style="list-style-type: none"> • Czech Insurance Association (CAP) • Insurance brokers (in 2011: 132 567 registered insurance brokers) <p>The members of CAP:</p> <p>http://www.cap.cz/onas/clenove/clenske-pojistovny</p> <p>Association of Czech Insurance Brokers (http://www.acpm.cz/index.php?lang=en): List of members:</p>	<ul style="list-style-type: none"> • Become familiar with the new changes in the amendment of the AML Act; • Learn about the new changes • Set up automatized systems (if they use); • Modify internal procedures; • Trainings for staff; • Modify relevant forms (web/paper form); • Information leaflets for customers/clients.

Target groups - general	Specific target groups	Goals for the institutions / What we want the institutions to do
	http://www.acpm.cz/index.php?action=section&id=1435	
Financial institutions – Loans and Savings 1. A person authorized to provide or trade with leasing, guarantees, credit or loans, 2. A person authorized to broker savings, leasing, credit or loans	<ul style="list-style-type: none"> • Czech leasing and finance association • Association of non-bank loans providers • Association of Financial Intermediaries and Financial Advisers of Czech Republic 	<ul style="list-style-type: none"> • Become familiar with the new changes in the amendment of the AML Act; • Learn about the new changes; • Set up automatized systems (if they use); • Modify internal procedures; • Trainings for staff; • Modify relevant forms (web/paper form); • Information leaflets for customers/clients.
Financial institutions - Other relevant institutions <ul style="list-style-type: none"> • A person authorized to buy and trade in debts and receivables • A person licensed to perform foreign currency exchange pursuant to the Law on foreign exchange activities • A person licensed to provide or broker payment services or postal services intended to transfer funds – actually this is only one subject – Česká pošta a.s. (Czech Post had 3 972 branches in 2014 in the Czech Republic). • A person licensed to provide consultancy services to private business in matters concerning equity, business strategy, merge, or acquisition, • A person providing services of financial 	<ul style="list-style-type: none"> • Broker-institutions • Foreign currency exchange • Česká pošta a.s. • Consultancy • Safekeeping • Operator of gambling activities • Traders of cultural heritage • Traders of used goods • Pawn-brokers 	<p>Exchange offices are generally considered as a high risk profession concerning the money laundering and terrorist financing. There are approx. 3 000 subjects providing currency exchange services in the Czech Republic.</p> <ul style="list-style-type: none"> • Become familiar with the new changes in the amendment of the AML Act; • Learn about the new changes; • Set up automatized systems (if they use); • Modify internal procedures; • Trainings for staff; • Modify relevant forms (web/paper form); • Information leaflets for customers/clients.

Target groups - general	Specific target groups	Goals for the institutions / What we want the institutions to do
<p>brokerage,</p> <ul style="list-style-type: none"> • A person providing services of safekeeping of valuables. 		
<p>Operators of gambling activities</p>	<p>In accordance with the 4th AML Directive the proposed amendment of the AML Act was strengthened in the field of gambling activities. Instead only of casino (betting games), the draft amended Law the obliged entities are listed as the OPERATOR OF GAMBLING ACTIVITIES (under the law regulating gambling) with the exception of monetary, material immediate or numerical lotteries, bingo or tombola.</p> <p>Concerning the gambling activities, there is a special control body – it is the State Supervision of Gambling and Lotteries of the MoF (http://www.mfcr.cz/en/about-ministry/organisation-chart/section-03-state-property-management/dept-34-state-supervision-of-gambling-a).</p> <p>This obliged person may also be checked by FAU.</p>	<ul style="list-style-type: none"> • Become familiar with the new changes in the amendment of the AML Act; • Learn about the new changes; • Set up automatized systems; • Modify internal procedures; • Trainings for staff; • Modify relevant forms (web/paper form).
<p>Person providing services with virtual currency.</p>	<p>There is a proposition of a new kind of the obliged entity in the proposed amendment of the AML Act. Due to the rapid extension of the use of the virtual currencies (e.g. Bitcoins), it is proposed to include among obliged entities the PERSON PROVIDING SERVICES WITH VIRTUAL CURRENCY.</p>	<ul style="list-style-type: none"> • Become familiar with the new changes in the amendment of the AML Act; • Learn about the new changes; • Set up automatized systems; • Modify internal procedures and relevant forms (web form); • Trainings for staff/providing self-studies; • Information e-leaflets for registered customers.

Target groups - general	Specific target groups	Goals for the institutions / What we want the institutions to do
<ul style="list-style-type: none"> • A person licensed to trade in items of cultural heritage, items of cultural value, or to act as intermediary in such services, • A person licensed to trade in used goods, act as intermediary in such trading, or receive used goods in pawn, • An entrepreneur (legal persons included) when trade cash for valued at 10.000 EUR or more. 	<p>These obliged entities are supervised (except of FAU) by the Czech trade inspection (http://www.coi.cz/en/).</p>	<ul style="list-style-type: none"> • Become familiar with the new changes in the amendment of the AML Act; • Learn about the new changes • Set up automatized systems (if they use); • Modify internal procedures; • Trainings for staff; • Modify relevant forms (web/paper form); • Information leaflets for customers/clients.
<p>Real estate traders or brokers</p>	<ul style="list-style-type: none"> • Association of Real Estate Agencies • Czech Chamber of real estate agencies • The biggest Real Estate companies and franchise companies <p>There is no obligation to become a member of any real estate association if someone operates real estate sales. But there exist in the Czech Republic two associations - Association of Real Estate Agencies (http://www.arkcr.cz/) with approx. 300 members and Czech Chamber of real estate agencies (they have on their websites special part about AML: http://www.ckrk.cz/aktualita/33/pozor-na-povinnosti-rk-pri-opatrenich-profi-legalizaci-vynosu-z-trestnecinnosti).</p> <p>But there are still many of non-attached real estate agencies in the Czech Republic.</p>	<ul style="list-style-type: none"> • Become familiar with the new changes in the amendment of the AML Act; • Learn about the new; • Set up automatized systems (if they use); • Modify internal procedures; • Trainings for staff; • Modify relevant forms (web/paper form); • Information leaflets for customers/clients.
<p>Auditors, tax advisors, chartered accountants</p>	<ul style="list-style-type: none"> • Chamber of Tax Advisers • Chamber of Certified Accountants <p>Actually there exists a Chamber of Tax Advisers (www.kdpcr.cz) with 4.596 advisors (individuals) and 864 audit/accounting/advisory companies and Chamber of Certified Accountants (http://www.komora-ucetnich.cz/cze/informace-komory);</p>	<ul style="list-style-type: none"> • Become familiar with the new changes in the amendment of the AML Act; • Learn about the new changes; • Trainings for staff.

Target groups - general	Specific target groups	Goals for the institutions / What we want the institutions to do
	file:///C:/Users/adriana/Downloads/en.pdf .	
Licenced executors Public notary Lawyers Trust funds	<ul style="list-style-type: none"> • Executor Chamber of the Czech Republic • Notarial Chamber of the Czech Republic • Czech Bar Association <p>There is a new definition of activities of trusts funds in the proposed amendment of the AML Act. Trusties are still quite new in the Czech Republic; it was established by the Act No. 89/2012 Coll., Civil Code.</p>	<ul style="list-style-type: none"> • Become familiar with the new changes in the amendment of the AML Act; • Learn about the news; • Set up automatized systems (if they use); • Modify internal procedures; • Trainings for staff; • Modify relevant forms (web/paper form); • Information leaflets for their members of chambers

6.2 ANNEX 2 – General table of activities

ACTIVITIES	DETAILS/SPECIFICATIONS
press conference	General press releases; press, newspapers, magazines etc.; commentary to the Annual Report 2016
Training for companies/national workshop/annual training (participation of the experts of FAU/CNB)	Designed for participants from the “Compliance” department of institutions and representatives of professional chambers/associations Goal: became familiar with the new changes in the amendment of the AML Act and learn about the new changes relevant persons (even the top management)
Training material (prepared by FAU/CNB)	Written/electronic version, general form
Basic information material (prepared by FAU)	Leaflet (an electronic version)
radio/news interview	Press office of MoF, experts from FAU
Develop website & content on AML-amendments	Experts from FAU
Establish RSS Feed (establish RSS-link for companies to sign up for RSS FEED)	Experts from FAU, eventually supported by press department
Ask business associations and chambers to publish the link to the RSS FEED / WHERE OBLIGED ENTITIES CAN SIGN UP	Experts from FAU, eventually supported by press department
FAQs	FAU task: published on the web of FAU; possible issue of the publication with the main FAU’s statements
National workshop/round table	Two-day workshop, split into individual round tables according to the types of obliged entities; Participants: representatives of Compliance departments of obliged entities and representatives from professional chambers/associations
Internal training	Training for staff of the obliged entities or members of professional chambers/associations
Discussion upon the Internal Procedure System	requirements on the modification of the IT/operational systems of the obliged entity, set up automatized systems; modify internal procedures; modify relevant forms (web/paper form); control by FAU/CNB of preparedness if the systems set up and are used properly

TIME SCHEDULE

Activity:	01/ 16	02/ 16	03/ 16	04/ 16	05/ 16	06/ 16	07/ 16	08/ 16	09/ 16	10/ 16	11/ 16	12/ 16	01/ 17	02/ 17	03/ 17	04/ 17	05/ 17	06/ 17
Press conference			x											x				
Training for companies									x	x	x							
Develop website & content on AML-amendments					x	x	x											
Establish RSS Feed (establish RSS-link for companies to sign up for RSS FEED)						x												
Ask business associations and chambers to publish the link to the RSS FEED							x											
Training material					x	x												
Easy understanding information material					x	x												
National workshop/round table									x									

FAQs – ongoing process (starting 5/16)

Internal Training – ongoing process

Discussion upon the Internal Procedure/Control of preparedness if it's used properly – ongoing process

6.3 ANNEX 3 -Table activities with Credit Institutions

ACTIVITIES	DETAILS/SPECIFICATIONS
Training for companies/annual training (participation of the experts of FAU/CNB)	Participants coming from the “Compliance” department of institutions; Goal: became familiar with the new changes in the amendment of the AML Act and learn about the new changes relevant persons (even the top management)
Training material (prepared by FAU/CNB)	Distributed via intranet (complemented by each bank to obtain specific information)
Basic information material (prepared by FAU)	Leaflet (an electronic version)
FAQs	For employees: use the FAQs of the FAU; For Customers: use the FAQs of the institutions/website info/front page actualities of the institution, newsletter (e-Newsletter); information placed on their branches; direct messages in emails/letters (private banking)
internal training	Training for staff of the obliged entities: Via e-learnings, videoconferences, self-studies; meetings with relevant managers (it depends on the level of the branch office); use special automated system, consultation with the Compliance department
Discussion upon the Internal Procedure System	requirements on the modification of the IT/operational systems of the obliged entity , set up automatized systems; modify internal procedures; modify relevant forms (web/paper form);

TIME SCHEDULE

Activity:	01/16	02/16	03/16	04/16	05/16	06/16	07/16	08/16	09/16	10/16	11/16	12/16	01/17	02/17	03/17	04/17	05/17	06/17
Training for companies					X	X	X	X	X	X	X	X	X	X	X	X	X	X
Training material*							X	X										
Easy understanding information material*							X	X										
FAQs							X	X	X	X	X	X	X	X	X	X	X	X
National workshop/round table									X									

*receiving from FAU and internal distribution

Internal training – ongoing process

Discussion upon the Internal Procedure/Control of preparedness if it’s used properly – ongoing process

6.4 ANNEX 4 – Table of Activities DNFBPs (Designated Non-Financial Businesses and Professions)

ACTIVITIES	DETAILS/SPECIFICATIONS
Training for companies/annual training (participation of the experts of FAU/CNB)	Participants coming from professional chambers and associations and their members; Goal: became familiar with the new changes in the amendment of the AML Act and learn about the new changes relevant persons (even the top management)
Training material (prepared by FAU/CNB)	Distributed via professional chambers/associations
Basic information material (prepared by FAU)	Leaflet (an electronic version); send through the professional chambers/associations to the members
FAQs	For professional chambers and associations: use the FAQs of the FAU; For Members: use the FAQs of the associations/chambers; website info/front page actualities of the associations/chambers, newsletter (e-Newsletter);
Internal training	Training for staff of the obliged entities: Via annual training organized by professional chambers/associations, self-studies; meetings and consultation with relevant representatives of professional chambers/associations
Discussion upon the Internal Procedure System	requirements on the modification of the IT/operational systems of the obliged entity , set up automatized systems (if they use); modify internal procedures; modify relevant forms (web/paper form);

TIME SCHEDULE

Activity:	01/16	02/16	03/16	04/16	05/16	06/16	07/16	08/16	09/16	10/16	11/16	12/16	01/17	02/17	03/17	04/17	05/17	06/17
Training for companies					x	x	x	x	x	x	x	x	x	x	x	x	x	x
Training material*							x	x										
Basic information material*							x	x										
FAQs							x	x	x	x	x	x	x	x	x	x	x	x
National workshop/round table									x									

*receiving from FAU and distribution through professional chambers/associations

Internal training – ongoing process

Discussion upon the Internal Procedure/Control of preparedness if it's used properly – ongoing process

6.5 ANNEX 5 – Table of Activities with Financial Institutions

ACTIVITIES	DETAILS/SPECIFICATIONS
Training for companies/annual training (participation of the experts of FAU/CNB)	Participants coming from the “Compliance” department of institutions and from professional chambers and associations; Goal: became familiar with the new changes in the amendment of the AML Act and learn about the new changes relevant persons (even the top management)
Training material (prepared by FAU/CNB)	Distributed via intranet (complemented by financial institutions to obtain specific information)
Basic information material (prepared by FAU)	Leaflet (an electronic version); send through the professional chambers/associations to the members
FAQs	For employees: use the FAQs of the FAU (use the website of professional chambers/associations); For Customers: use the FAQs of the institutions/website info/front page actualities of the institution, newsletter (e-Newsletter); information placed on their branches; possibly direct messages in emails/letters
Internal training	Training for staff of the obliged entities: Via e-learnings, videoconferences, self-studies; meetings with relevant managers (it depends on the level of the branch office); use special automated system (if they use), consultation with the Compliance department (or other relevant persons) and consultation with the representatives of professional chambers/associations
Discussion upon the Internal Procedure System	requirements on the modification of the IT/operational systems of the obliged entity , set up automatized systems (if they use); modify internal procedures; modify relevant forms (web/paper form);

TIME SCHEDULE

Activity:	01/16	02/16	03/16	04/16	05/16	06/16	07/16	08/16	09/16	10/16	11/16	12/16	01/17	02/17	03/17	04/17	05/17	06/17
Training for companies					x	x	x	x	x	x	x	x	x	x	x	x	x	x
Training material*							x	x										
Basic Information material*							x	x										
FAQs							x	x	x	x	x	x	x	x	x	x	x	x
National workshop/round table									x									

*receiving from FAU and distribution through professional chambers/associations

Internal training – ongoing process

Discussion upon the Internal Procedure/Control of preparedness if it's used properly – ongoing process

6.6 ANNEX 6 – Table of Activities targeting general public

ACTIVITIES	YES	NO	DETAILS/SPECIFICATIONS
Press conference	x		Receiving information from Press office of MoF/CNB
Radio/news interview	x		As listeners, questions, chat, web information (Ministry of Foreign Affairs – info for travellers/foreigners)
FAQs	x		use the FAQs of the FAU/associations/chambers/website info of companies (obliged entities) from relevant private sector/front page actualities of the associations/chambers, newsletter (e-Newsletter); etc.

TIME SCHEDULE

Activity:	01/ 16	02/ 16	03/ 16	04/ 16	05/ 16	06/ 16	07/ 16	08/ 16	09/ 16	10/ 16	11/ 16	12/ 16	01/ 17	02/ 17	03/ 17	04/ 17	05/ 17	06/ 17
Press Conference					x									x				
FAQs							x	x	x	x	x	x	x	x	x	x	x	x
Radio/news interview									x									