

Strasbourg, 1 December 2025

C198-COP(2025)11

CONFERENCE OF THE PARTIES

**Council of Europe Convention on Laundering, Search,
Seizure and Confiscation of the Proceeds from Crime
and on the Financing of Terrorism (CETS No. 198)**

**17th Plenary Meeting
Strasbourg, 4-5 November 2025**

MEETING REPORT

Memorandum prepared by the Secretariat
Directorate General Human Rights and Rule of Law (DGI)

SUMMARY OF THE PROCEEDINGS

The Conference of the Parties to the Council of Europe's Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS no. 198, hereafter the Convention or the Warsaw Convention) held its 17th meeting in Strasbourg, from 4 to 5 November 2025, chaired by Ms Oxana GISCA (President of the Conference of the Parties, Republic of Moldova). The agenda, the decisions taken, and the list of participants are annexed to this report.

The report summarises the discussions on each agenda item and the decisions adopted by the Conference of the Parties (hereinafter COP 198).

Item 1. Opening of the meeting by Ms Hanne Juncher, Director of Security, Integrity and Rule of Law Directorate

Ms. Hanne Juncher, Director of the Directorate for Security, Integrity, and Rule of Law, opened the 17th plenary meeting of the Conference of the Parties to the Warsaw Convention by underscoring the Convention's enduring relevance and global impact since its adoption in 2005. Ms. Juncher also emphasised the critical importance of the COP's monitoring mechanism, which ensures the Convention's effective implementation and fosters international cooperation. She also noted the growing interest from non-Council of Europe countries in acceding to the Convention, highlighting its expanding influence as a dynamic and adaptable legal instrument.

A key objective for the Council of Europe, as outlined by Ms. Juncher, is the finalisation of the draft Additional Protocol to the Warsaw Convention. This Protocol is designed to address emerging threats, including those posed by virtual assets and rapidly evolving criminal methodologies, ensuring the Convention remains robust and responsive to contemporary challenges. She called on State Parties to sustain their active engagement in this initiative, recognising their commitment as essential to the Convention's continued success and its ability to safeguard democratic societies

Item 2. Adoption of the agenda and order of business

The agenda was adopted with minor adjustments to the timing of certain items.

Item 3. Information from the President and the Executive Secretary

The President reported on a number of bilateral meetings, held online in May 2025 following the decision of the COP at its 16th Plenary meeting. These consultations involved high-level representatives from Armenia, Serbia, North Macedonia, Türkiye and the Russian Federation. The objective of these consultations was to convey high-level messages and facilitate progress on the long-pending implementation of Articles 11 and 14, as well as Article 25 (2 and 3) of the Convention. During these consultations meetings, the authorities of each State Party presented updates on their ongoing legislative processes and efforts to align with the Convention's requirements.

The President also informed the Plenary of other activities undertaken by the Conference of the Parties since the last meeting. In collaboration with the Egmont Group, the President, the COP Secretariat, and Scientific Experts—with support from Latvia, the United Kingdom, and Aruba—organised a workshop on asset recovery issues, during the Egmont Plenary meeting

held in Luxembourg from 6-11 July 2025. The workshop explored the added value of CETS No. 198 within the global anti-money laundering and counter-terrorist financing framework, as well as its role in asset recovery. The event was attended by representatives from Financial Intelligence Units and international organisations, including the International Monetary Fund (IMF) and the Financial Action Task Force (FATF).

Additionally, the President highlighted her involvement in the anti-money laundering and counter-terrorist financing conference organised by Ukraine's Ministry of Finance and Financial Intelligence Unit (18-20 December 2024), where she presented recent developments within the Conference of the Parties.

The Executive Secretary reported on outreach initiatives targeting non-Council of Europe member States, including a presentation of the Convention at the Forum of FATF-Style Regional Bodies held in Strasbourg in February 2025. Also, at the FATF Plenary Meeting in Paris held in October 2025, the valuable contributions of the COP and its Scientific Experts to the FATF Guidance and Best Practices on Asset Recovery were formally recognized.

Item 4. State of signatures and ratifications of the Warsaw Convention

The Secretariat informed the Conference of the Parties of the decision taken by the Committee of Ministers regarding Kazakhstan's request to accede to the Warsaw Convention. At its 1524th meeting on 2 April 2025, the Committee of Ministers decided to invite Kazakhstan to accede to the Convention.¹ This invitation remains valid for five years, subject to Kazakhstan's compliance with the financial contribution requirements outlined in CM/Res(2022)6. The President observed that Kazakhstan had not yet reported further action and encouraged the country to proceed with the accession process.

The United Kingdom formally announced the extension of its ratification of the Convention to the territory of Gibraltar, which entered into force on 1 July 2025. This extension enables Gibraltar to participate fully in the Convention's mechanism and to contribute to global efforts to combat money laundering and the financing of terrorism. Gibraltar is now eligible for assessment under the Convention's monitoring framework within the next five years. The United Kingdom's representative proposed scheduling this assessment of the implementation of the Convention's provisions toward the end of that period to allow adequate time for preparation.

The Netherlands reported that the Kingdom of the Netherlands had formally accepted the application of the Convention to Curaçao. This decision further strengthens the engagement of the Kingdom of the Netherlands in international initiatives aimed at combating money laundering and terrorism financing.

Item 5. Declarations and reservations

The Secretariat provided an overview of the status of declarations and reservations to the Convention since the 16th plenary meeting. Bosnia and Herzegovina submitted a declaration under Article 46(13), stating that the State Investigation and Protection Agency serves as its Financial Intelligence Unit. To date, only one State Party² has yet to submit this declaration.

¹ See [CM/Del/Dec\(2025\)1524/10.2](#)

² France

The Secretariat reiterated the COP's previous encouragement for State Parties to review and consider lifting their reservations, particularly for provisions already implemented in national legislation. In this context, Slovenia reported that an expert-level decision had been taken to withdraw its reservation on Article 3(4), with a substantive update expected in the coming year.

Item 6. Information provided by Parties and Observers on topical developments of relevance for the Conference of the Parties

Several State Parties shared updates on recent legislative developments, significant case law, and emerging practices concerning the confiscation and management of assets.

Latvia presented a recent Constitutional Court decision which upheld the procedures for addressing criminally acquired property, including the reversal of the burden of proof. The Court ruled that these procedures, which require property owners to demonstrate the lawful origin of their assets, do not infringe the presumption of innocence, as they pertain exclusively to the property itself rather than to an individual's criminal liability.

Montenegro highlighted an ongoing money laundering case involving luxury purchases of cars with unexplained cash. Prosecutors relied on Article 9(2)(c) of the Convention to infer the defendant's intent and knowledge from the objective factual circumstances.

Italy described a case where a measure known as "judicial administration"—less severe alternative to confiscation—was imposed on a football club suspected of being controlled by individuals belonging to OCGs. This measure enables authorities to temporarily take control of an entity's management when there is sufficient evidence that its economic activities are influenced by mafia-related pressure or facilitation.

The United Kingdom reported favourable European Court of Human Rights decisions regarding its confiscation regime. They further provided information about an initiative to promote transparency in asset recovery data and invited other State Parties to participate and consider adopting a similar approach. The Secretariat encouraged the United Kingdom to share any written materials related to this initiative.

The Netherlands announced progress on legislation for non-conviction-based confiscation, aimed at tackling transnational criminal networks by seizing illicit assets even in the absence of a conviction.

Item 7: Monitoring the implementation of the Convention

i. UK Crown Dependency of Jersey

In accordance with Rule 19 bis of the Rules of Procedure, the Secretariat presented the report on Jersey's implementation of the provisions of the Convention subject to the Thematic Monitoring Reviews conducted since 2018. The report included a detailed analysis of Jersey's level of implementation for each relevant provision of the Convention. Following the Secretariat's presentation, the Jersey authorities provided supplementary information and case examples to further clarify their progress and compliance efforts. The discussion also included interventions from some State Parties, who raised questions regarding the analysis of specific provisions.

The analysis confirmed that Jersey had implemented the reversal of the burden of proof through the Proceeds of Crime (Jersey) Law 1999 and the Forfeiture of Assets (Civil Proceedings) (Jersey) Law 2018 as required by Article 3(4) of the Convention. Jersey's representative provided further details on the practical implementation of these provisions.

Regarding Articles 7(2(c)) and 19(1), the Secretariat confirmed that Jersey's legal framework permits courts to order financial institutions to monitor and report on account activities for up to 90 days, including upon foreign request. Jersey clarified that this measure is primarily applied in money laundering and terrorist financing investigations. One State Party questioned whether this requirement should extend to all offences listed in the Appendix. The Secretariat clarified that the requirement specifically relates to money laundering and terrorist financing offences, and such approach is consistent with the one taken for other State Parties. Following the discussion, minor linguistic amendments were introduced into the analysis of this provision.

The Secretariat further confirmed that Jersey's legal system criminalises money laundering offences in accordance with Article 9(3) of the Convention. Jersey authorities provided additional details of the case where the defendant was charged for suspecting that property subject to money laundering activities had illegal origin.

With respect to Article 11, the Secretariat noted that Jersey's legal system complies by permitting courts to consider foreign convictions when determining domestic sentences and that some cases of practical examples were presented in order to demonstrate the effective implementation.

Similarly, Jersey's legal framework ensures the adequate management of frozen and seized assets, in line with Article 6 of the Convention. A similar conclusion was reached with respect to Article 14 of the Convention, as the Financial Intelligence Unit is empowered to refuse consent for suspicious transactions upon receiving a Suspicious Activity Report.

Concerning Article 25 (2 and 3) of the Convention, the analysis highlighted that while Jersey's legislation allows for asset-sharing agreements, it does not explicitly mandate the prioritisation of returning assets to requesting parties for victims' compensation or to legitimate owners. Following the discussion, minor amendments were introduced to better reflect Jersey's legal framework.

Finally, the analysis concluded that Jersey's legal framework on the liability of legal persons for money laundering and terrorist financing is mostly in line with the requirements of Article 10 (1 and 2) of the Convention. However, it was noted as limitation that such liability can be applied only to certain types of legal persons.

The plenary adopted the report as amended during the plenary discussion with proposed amendments and decided that it shall be incorporated into the existing horizontal reviews and published on the Conference of the Parties' website. In light of the findings, it was determined that no follow-up procedures were required.

ii. UK Crown Dependency of Isle of Man

In accordance with Rule 19 bis of the Rules of Procedure, the Secretariat presented the report on the Isle of Man's implementation of the provisions of the Convention subject to the Thematic Monitoring Reviews conducted since 2018. The report included a detailed analysis

of the Isle of Man's level of implementation for each relevant provision of the Convention. Following the Secretariat's presentation, the Isle of Man authorities provided some supplementary information and where relevant case examples to further clarify their progress and compliance efforts.

The Secretariat highlighted that while the Isle of Man had made a declaration regarding the application of the Article 3(4) of the Convention, the legal provisions in the Proceeds of Crime Act 2008, empower authorities to apply the reversal of the burden of proof in procedures. This ensures full compliance with the Convention's requirements and the Isle of Man was invited to consider lifting the declaration.

With respect to Articles 7(2(c)) and 19(1), the report confirmed that the Isle of Man's legal framework permits the monitoring of banking operations as an investigative measure in money laundering cases, including upon foreign request. The authorities further clarified that so far there were no case examples demonstrating the effective implementation of these provisions.

The Secretariat further noted that the requirements of Articles 9(3) and 11 of the Convention were fully implemented in national legislation. Following the Isle of Man's intervention, minor amendments were introduced into the analysis in order to bring more clarity into the analysis and conclusions.

Regarding Article 6 of the Convention, the Secretariat presented that while the Isle of Man has a general legal framework in place to manage frozen and seized assets, detailed guidelines are lacking to ensure proper management of different types of assets, including complex or profit-generating ones. The authorities further confirmed that, in practice, the majority of seized assets consist of money which do not require particular (specialised) management.

With respect to Article 14 of the Convention, the Isle of Man's consent regime under the Proceeds of Crime Act 2008 was found to align with the Convention's requirements. The Secretariat noted that the authorities presented statistics on the effective implementation of this regime.

The Secretariat further noted that the Isle of Man's Proceeds of Crime Act 2008 enables asset-sharing agreements and prioritises victim compensation, as required by Article 25 (2 and 3) of the Convention. However, some minor deficiencies were identified since the legislation does not address the return of confiscated property to legitimate owners upon request from another State Party.

Finally, the Secretariat emphasised that the Isle of Man's Proceeds of Crime Act 2008 establishes corporate liability for money laundering and terrorist financing offences, thereby aligning its legislation with Article 10 (1 and 2) of the Convention. However, since the authorities confirmed the absence of examples demonstrating practical implementation, they were encouraged to develop case law in this respect.

The COP adopted the report as amended during the plenary discussion, decided that it shall be incorporated into the existing horizontal reviews and published on the Conference of the Parties' website, and noted that no follow-up procedures are required.

Item 8. Preparation of an additional protocol to the CETS no. 198 and COP inputs in the process

Mr. Cornel-Virgiliu Călinescu, Chair of the Committee of Experts on Criminal Asset Recovery (PC-RAC), presented the draft Additional Protocol to CETS No. 198 and its main advances. The Protocol, as agreed by the Committee, aims to modernise legal frameworks in asset recovery, improve cross-border cooperation, and address emerging challenges such as virtual assets and cybercrime. Key features include definitions for financial investigations, virtual assets, and virtual asset service providers, as well as extended confiscation, non-conviction-based confiscation, and confiscation from third parties. It also includes safeguards, training, and resources to ensure effective implementation. As for the procedures that will follow, the Chair of the PC-RAC explained that the draft protocol would now be reviewed by the European Committee on Crime Problems (CDPC) upon which approval it will be submitted to the Committee of Ministers for adoption. It is expected that these procedures would be finalised in the first half of 2026.

Several State Parties provided comments and commended the draft Protocol as a comprehensive tool that elevates the Warsaw Convention to the forefront of international asset recovery standards. The Conference of the Parties fully endorsed the draft text of the Protocol, which once adopted and in force, is expected to mark a significant advancement in global asset recovery efforts.

Item 9. Follow up procedure: Report on progress made by the States Parties

i. Follow-up report on articles 11, 25 (2 and 3), and 14

The Secretariat conducted an analysis of the progress made by the Russian Federation, Serbia, and Türkiye regarding Article 11; by Armenia and Serbia regarding Article 25(2 and 3); by North Macedonia regarding Article 25(2); and by the Russian Federation regarding Article 14 of the Convention.

The Secretariat presented the report on Article 11, noting that none of the State Parties had introduced legislative measures to fully address the identified deficiencies under this article. However, the report acknowledged measures taken by some State Parties that, once adopted and implemented, could potentially resolve the issue of application of international recidivism.

The Russian delegation expressed the view that their submissions demonstrated compliance with the requirements of Article 11. The Secretariat took note of this position and clarified that while the statements made in the submission could qualify as compliance with Article 11, no specific underlying materials were provided to support them. In light of this, the Secretariat advised that case law and examples of the *de facto* application of international recidivism, if made available, would prompt additional analysis. Absent such materials, simple statements on the article's application were not considered sufficient. Consequently, it was agreed that the Russian delegation would submit cases demonstrating the practical implementation of Article 11 after the plenary meeting, upon which these would be analysed and, should the conclusions differ from those in the current version of the follow-up report, appropriate amendments would be made to the conclusion part. Consequently, the revised follow-up report on Article 11 would be submitted for approval through a written procedure.

With respect to Article 25(2 and 3), the Secretariat noted that Armenia had fully implemented the requirements through the adoption of the necessary legislation. In contrast, neither North Macedonia nor Serbia had adopted the legislative amendments needed to address these provisions of the Convention. However, both States Parties presented draft legal acts that, once adopted, would implement Article 25(2 and 3). The Secretariat clarified that only enacted legislation would be taken into account to determine whether the requirements have been met.

Regarding Article 14, the report highlighted legislative amendments in the Russian Federation that enable the suspension of suspicious transactions, as required. Since the new legislative provisions were described in the submission, but not provided in their original form, the Russian Federation was invited to submit the relevant legal extracts, after which the Secretariat would examine them and confirm the conclusions of the follow-up report accordingly.

Overall, the follow-up report concluded that:

- (i) with respect to Article 11, no progress had been observed in relation to the Russian Federation, Serbia, and Türkiye. However, the issue relating to the case law and practices to be submitted by the Russian Federation remains outstanding;
- (ii) with respect to Article 25 (2 and 3) Armenia has made sufficient progress; while insufficient progress was observed in respect to North Macedonia with regard to Article 25(2) and
- (iii) with respect to Article 14, the Russian Federation made sufficient progress – conditional upon the submission of extracts from the new legislation.

Following the presentation of the follow-up report on the three articles, the COP took note the measures provided under Rule 19 bis(25) for situations where state(s) party(ies) repeatedly failed to implement a provision of the Convention and not satisfactorily made progress thereafter. The COP agreed that, subject to possible further analysis and amendments to the report on Article 11 in respect to the Russian Federation, Rule 19bis(25.ii) of the Rules of Procedure would be applied where appropriate and the Parties³ which made insufficient progress in relation to articles 11 and 25 would be contacted, including by inviting the Secretary General of the Council of Europe to consider sending a letter to the competent ministers regarding persistent non-compliance with certain provisions of the Convention.

ii. Follow-up report on articles 7(2(c)) and 19(1)

The Secretariat carried out and presented follow-up reports on Articles 7(2(c)) and 19(1) with respect to Austria, Denmark, France, Spain, and Türkiye.

The report noted that none of the assessed States Parties had adopted the legislative amendments required to enable the monitoring of banking operations as an investigative measure, including in response to requests from foreign counterparts. The Secretariat further explained why the submissions provided were not sufficient to confirm compliance with the requirements of these articles. In addition, some wording proposals from the delegation of Türkiye were accepted and incorporated into the text of the report.

³ Serbia, Türkiye, North Macedonia and the Russian Federation (*for RF it will depend if additional information is sent after the plenary*).

The delegation of Austria acknowledged the analysis and invited further consideration of the additional information presented during the plenary meeting. Austria presented three case examples demonstrating the use of monitoring of banking operations, as an investigative measure in serious criminal investigations. The Secretariat took note of these examples, and it was agreed to amend the report to reflect Austria's compliance with Article 7(2(c)).

The delegation of Spain committed to providing case law or practical examples for the next follow-up procedure to demonstrate the application of this investigative measure. The Secretariat agreed to reassess Spain's implementation in the next follow-up report.

The COP adopted the follow-up report on Articles 7(2(c)) and 19(1) with the proposed amendments. Based on the discussions and some concerns raised regarding the interpretation of these provisions, the COP entrusted the Secretariat and the Scientific Experts to prepare an interpretative note on these two articles and present it at the next plenary meeting.

iii. Follow-up report on Article 3(4)

The Secretariat conducted and presented a follow-up report on Article 3(4) of the Convention with respect to the Republic of Moldova, Monaco, Spain, and San Marino.

The report concluded that the Republic of Moldova, Monaco, and San Marino had introduced legislative amendments enabling the application of the reversal of the burden of proof in confiscation procedures. However, Spain had not introduced the necessary legislative amendments to implement Article 3(4) of the Convention.

The delegation of Spain presented a Supreme Court judgment, contending that the reversal of the burden of proof is applied in practice within the confiscation procedures. However, the Secretariat and the Scientific Expert noted that the example did not unequivocally demonstrate that the requirements of Article 3(4) of the Convention have been met. While it was agreed to amend the report to reflect Spain's arguments, it was emphasised that additional case law would be required to confirm full implementation of the provision.

The plenary adopted the follow-up report on Article 3(4) of the Convention with the proposed amendments.

Item 10. Article 10 ('corporate liability'): Cases of practical implementation of the Convention by State Parties, thematic session on corporate liability – presentation by selected experts and States Parties, followed by a Tour de table

The COP held a thematic session on the practical implementation of Article 10 of the Convention. Experts from various jurisdictions and the Council of Europe's scientific expert delivered presentations emphasising good practices and challenges in pursuing legal persons for financial crime and applying dissuasive sanctions.

Martin Polaine, Council of Europe Expert underlined the importance of corporate liability in combating corruption and bribery. He emphasised the need for comprehensive investigative tools and a range of sanctions applicable to legal persons.

Annig Rogar from the Netherlands presented cases involving the liability of financial institutions in money laundering cases. In one case, a bank was fined €480 million for systemic compliance failures. This example underscored the importance of cooperation, transparency, and remediation in resolving such cases.

Liana Esposito from Italy explained Italy's administrative liability model for legal persons, focusing on the establishment of compliance programmes as a preventive mechanism to avoid the criminal use of companies.

Dejan Darmanin from Malta shared a complex case involving corporate structures used for money laundering, illustrating the challenges of proving corporate liability and the importance of both individual and corporate accountability.

Ioannis Androulakis, Scientific Expert of the COP, provided details on the Interpretative Note on Article 10, stressing the need for effective supervision, internal controls, and compliance programmes to prevent corporate misconduct.

Item 11. Elections

The COP re-elected Ms Oxana Gisca (Republic of Moldova) as President and Claudia Elion (the Netherlands), as Vice-President, both for a second and final two-year term of office.

The COP also heard presentations from three candidates for the Bureau. The COP elected Ms Branka Glojnarič (Slovenia), Mr Dainis Vēbers (Latvia) and Mr Ian McDonald (UK) as members of the Bureau for a first two-year term of office, which may be renewed once. The Bureau's term in this composition will begin on 1 January 2026.

Item 12. Status of implementation of the Workplan and priority actions of the Conference of the Parties for 2024-2025; Discussion of the Workplan and priority actions for the next biennium

The Secretariat presented an update on the status of implementation of the Objectives and Priority Actions for 2024–2025. The document presented at the plenary confirmed that within the three Objectives – each containing three actions, one objective (*Ensure the continued relevance of the Warsaw Convention and identify areas of priority focus for the work on the future additional protocol*) had been fully achieved, while for other two objectives, two out of three actions had been implemented. Of the two outstanding actions, one requires external funding (*organisation of thematic event(s) in a host Party*) and the other concerns the ratification of the Convention by the EU, which depends entirely on EU internal processes.

The Bureau proposed reviewing the current follow-up and monitoring procedures for the Convention, expressing concerns regarding the efficiency and added value of repetitive follow-up reports. The COP decided to entrust the Bureau and the Secretariat with proposing amendments to the Rules of Procedure regarding follow-up reports for examination at the next plenary meeting.

Regarding monitoring activities for 2026, the COP invited Gibraltar and Curaçao to consider undergoing thematic monitoring review of the implementation of the provisions of the Convention that have been the subject of the thematic monitoring since 2018. The Secretariat was instructed to communicate with these jurisdictions through the delegation of the States Parties that extended the application of the Convention to them. This communication should

include details of the assessment process and the corresponding timeline.

Mr Evgeni Evgeniev from the Council of Europe's Economic Crime and Cooperation Division provided an overview of technical assistance activities in Central Asia, the Western Balkans, Eastern Partnership countries, and North Africa. These efforts aim to strengthen legislative and institutional frameworks, enhance asset recovery measures such as non-conviction-based confiscation, and improve investigative techniques, particularly in emerging areas like crypto assets.

Item 13. COP inputs into the FATF Asset Recovery Guidance

The Plenary welcomed the presentation by Marybeth Grunstra from the FATF Secretariat, on the newly published FATF Asset Recovery Guidance and Best Practices. She acknowledged the significant contribution of COP scientific experts to the development of the guidance and underscored its alignment with the Convention. This document constitutes the FATF's first comprehensive guidance on asset recovery in 13 years, and adopts a hybrid approach, combining policy explanations with practical case studies and best practices. Its objectives are to clarify revised standards, support their implementation through 85 case examples drawn from more than 40 jurisdictions, and encourage innovative practices that go beyond core requirements. The FATF representative expressed appreciation to the COP and its scientific experts for their extensive contributions to the guidance.

The COP noted its support for the guidance, emphasising its potential to strengthen global asset recovery efforts.

Item 14. Other business

No other business was raised by the delegations.

Item 15. Future meetings

The 18th meeting of the Conference of the Parties will be held in Strasbourg in the second half of 2026, with the exact dates to be communicated by the Secretariat in due course.

Item 16. Adoption of decisions

The COP adopted the list of decisions as it appears in the Annex to the present report.

AGENDA / ORDRE DU JOUR
Palais de l'Europe, Room 10 / salle 10

1. Opening of the meeting (9.30 am) Welcome statement by Ms Hanne Juncher, Director, Security, Integrity and Rule of Law Directorate.	Ouverture de la réunion (9h30) <i>Discours de bienvenue de Mme Hanne Juncher, Directrice, Sécurité, Intégrité et État de droit.</i>
2. Adoption of the agenda and order of business The Conference of the Parties is invited to examine and adopt the agenda and the order of business.	Adoption de l'ordre du jour et des travaux <i>La Conférence des Parties est invitée à examiner et à adopter l'ordre du jour et l'ordre des travaux.</i>
3. Information from the President and the Executive Secretary The Conference of the Parties is invited to take note of the information provided by the President and by the Secretariat about any developments since the last meeting, and of any implications it may have for the Conference of the Parties' operation and activities.	Informations communiquées par la Présidente et le Secrétaire exécutif <i>La Conférence des Parties est invitée à prendre note des informations fournies par le Président et par le Secrétariat sur les développements intervenus depuis la dernière réunion, et de leurs implications éventuelles sur le fonctionnement et les activités de la Conférence des Parties.</i>
4. State of signatures and ratifications of the Warsaw Convention i. Information on the CM's decision on the request by <i>Kazakhstan</i> to be invited to sign and ratify the Warsaw Convention. ii. Action taken by member states (United Kingdom in relation to Gibraltar and the Netherlands for Curaçao) and the European Union towards signature or ratification of the Warsaw Convention. The President will invite States Parties, participating observers and the European Union to inform the Conference of the Parties of measures taken or planned towards becoming a Party to the Convention.	État des signatures et ratifications de la Convention de Varsovie i. Information sur la décision du CM concernant la demande du <i>Kazakhstan</i> visant à être invité à signer et à ratifier la Convention de Varsovie. ii. Mesures prises par les États membres (<i>Royaume-Uni vis-à-vis de Gibraltar et Pays-Bas pour Curaçao</i>) et l'Union européenne en vue de la signature ou de la ratification de la Convention de Varsovie. <i>La Présidente invitera les États parties, les observateurs participants et l'Union européenne à informer la Conférence des Parties sur les mesures prises ou envisagées en vue de devenir Partie à la convention.</i>
5. Declarations and reservations An oral update will be provided by the Secretariat on changes to the declarations and reservations since the last meeting. Parties are invited to share experience on the application of reservations and declarations.	Déclarations et réserves <i>Le Secrétariat fournira une présentation orale sur les changements apportés aux déclarations et aux réserves depuis la dernière réunion. Les Parties sont invitées à partager leur expérience sur l'application des réserves et des déclarations.</i>

6. Information provided by Parties and Observers on topical developments of relevance for the Conference of the Parties Parties and observers are invited to present information on legislative developments, major cases or judgments, important events, training provided to other countries, including by international organisations etc. (brief interventions- 3 minutes per intervention).	Informations communiquées par les Parties et les Observateurs sur des sujets d'actualité présentant un intérêt pour la Conférence des Parties <i>Les Parties et les observateurs sont invités à présenter des informations sur les développements législatifs, les affaires ou jugements majeurs, les événements importants, les formations dispensées à d'autres pays, y compris par des organisations internationales, etc. (Brèves interventions– 3 minutes par intervention).</i>
7. Monitoring the implementation of the Convention i. UK Crown Dependency of Jersey: Amendments to the 2018, 2019, 2020, 2021, 2022 thematic monitoring reports – assessment of the Crown dependency of Jersey– <i>for adoption</i> ii. UK Crown Dependency of Isle of Man: Amendments to the 2018, 2019, 2020, 2021, 2022 thematic monitoring reports – assessment of the Crown Dependency Isle of Man – <i>for adoption</i> The President will invite the Secretariat, and the counties assessed to present the report and its findings. The Conference of the Parties is invited to examine and adopt the reports.	Suivi de la mise en œuvre de la Convention i. <i>Dépendance de la Couronne britannique de Jersey : amendements aux rapports de suivi thématiques de 2018, 2019, 2020, 2021 et 2022 – évaluation de la Dépendance de la Couronne britannique de Jersey - pour adoption</i> ii. <i>Dépendance de la Couronne britannique de l'Île de Man : amendements aux rapports de suivi thématiques de 2018, 2019, 2020, 2021 et 2022 - évaluation de Dépendance de la Couronne britannique de l'Île de Man - pour adoption</i> <i>La Présidente invitera le Secrétariat et les pays évalués à présenter le rapport et ses conclusions. La Conférence des Parties est invitée à examiner et à adopter les rapports.</i>
8. Preparation of an additional protocol to the CETS no. 198 and COP inputs in the process The COP is invited to hold an exchange of views with Mr Cornel-Virgiliu Calinescu (Romania), Chair of the Council of Europe's Committee of Experts on Criminal Asset Recovery (PC-RAC) on the state of play of the negotiation process, and invitation to the COP to provide its final comments to the draft protocol.	Préparation d'un protocole additionnel à la STCE n° 198 et contributions de la CdP au processus <i>La CdP sera invitée à discuter avec M. Cornel-Virgiliu Calinescu (Roumanie), Président du Comité d'experts sur le recouvrement des avoirs criminels (PC-RAC) du Conseil de l'Europe sur l'état d'avancement des négociations ainsi que l'invitation à la CdP à fournir ses commentaires sur le projet de protocole.</i>
9. Follow up procedure: Report on progress made by the States Parties: i. Articles 11 and 25 (2 and 3) of the Convention⁴ - <i>for adoption</i>;	Procédure de suivi : rapport sur les progrès réalisés par les États Parties : i. Articles 11 et 25 (2 et 3) de la Convention⁸ - <i>pour adoption</i> ;

⁴ In respect of Article 11: the Russian Federation, Serbia, Türkiye; in respect of Article 25: Armenia, North Macedonia, Serbia.

⁸ Pour l'article 11 : Fédération de Russie, Serbie, Türkiye; en ce qui concerne l'article 25 : Arménie, Macédoine du Nord, Serbie.

ii. Article 14⁵ - for adoption; iii. Article 7(2 (c))⁶ and 19(1) - for adoption; iv. Article 3(4)⁷- for adoption; The Secretariat will present the draft report on progress made by the States Parties reporting under this procedure and its findings, followed by a discussion with the Parties. The Conference of the Parties is invited to examine and adopt the reports, and the recommendations contained therein.	ii. Article 14⁹- pour adoption ; iii. Article 7(2 (c)) ¹⁰ et 19(1) - pour adoption iv. Article 3(4)¹¹ -pour adoption <i>Le Secrétariat présentera le projet de rapport portant sur les progrès réalisés par les États parties ayant présenté des rapports dans le cadre de cette procédure ainsi que ses conclusions. Il s'en suivra une discussion avec les Parties. La Conférence des Parties est invitée à examiner et à adopter les rapports ainsi que les recommandations qu'ils contiennent.</i>
10. Article 10 ('corporate liability'): Cases of practical implementation of the Convention by State Parties, thematic session on corporate liability – presentation by selected experts and States Parties, followed by a Tour de table As a follow up to the 2021 thematic review, the President will invite selected experts and States Parties to present cases/jurisprudence and key aspects of corporate liability.	Article 10 - Responsabilité des personnes morales : Mise en œuvre pratique de la Convention par les États parties, session thématique sur la responsabilité des personnes morales – présentation par des experts sélectionnés et des États parties, suivie d'un tour de table <i>Dans le prolongement de l'étude de suivi thématique de 2021, la Présidente invitera des experts sélectionnés et des États parties à présenter des cas/jurisprudence ainsi que les aspects clés de la responsabilité des personnes morales.</i>
11. Elections	Elections
12. Status of implementation of the Workplan and priority actions of the Conference of the Parties for 2024-2025; Discussion of the Workplan and priority actions for the next biennium The Conference of the Parties is invited to review the implementation of the priority actions for the period 2024-2025 and agree on the priority areas in the next biennium, in particular with respect to its monitoring function. The discussion will be supported by a review paper prepared by the Secretariat.	État d'avancement de la mise en œuvre du Plan de travail et des actions prioritaires de la Conférence des Parties pour 2024-2025 ; discussions du Plan de travail et des actions prioritaires pour la prochaine période biennale <i>La Conférence des Parties est invitée à discuter la mise en œuvre des actions prioritaires pour la période 2024-2025 et à convenir des domaines prioritaires pour la prochaine période biennale, en particulier en ce qui concerne sa fonction de contrôle. La discussion s'appuiera sur un document d'examen préparé par le Secrétariat.</i>

⁵ In respect of Article 14: Russian Federation.

⁶ In respect of Article 7(2 c): Austria, Denmark, France, Spain, Türkiye.

⁷ In respect of Article 3(4): Republic of Moldova, Monaco, Spain, San Marino.

⁹ Pour l'article 14 : Fédération de Russie.

¹⁰ Pour l'Article 7(2 c) : Autriche, Danemark, France, Espagne, Türkiye.

¹¹ Pour l'Article 3(4): R

épublique de Moldova, Monaco, Espagne, Saint Marin.

13. COP inputs into the FATF Asset Recovery Guidance The scientific experts are invited to present their inputs into the FATF Asset Recovery Guidance which was adopted at the FATF Plenary (October 2025)	Contribution de la CdP aux lignes directrices du GAFI sur le recouvrement des avoirs <i>Les experts scientifiques sont invités à présenter leurs contributions aux lignes directrices du GAFI sur le recouvrement des avoirs, qui ont été adoptées lors de la Plénière du GAFI d'octobre 2025.</i>
14. Other business Delegations are invited to raise, prior or at the early beginning of the meeting, any other issues and present them.	Divers <i>Les délégations sont invitées à soulever, avant ou au début de la réunion, toutes autres questions et à les présenter.</i>
15. Future meetings The COP is invited to take note of the proposed calendar for 2026.	Prochaines réunions <i>La Conférence des Parties est invitée à prendre note du calendrier proposé pour 2026.</i>
16. Adoption of decisions The Conference of the Parties will adopt the list of decisions.	Adoption des décisions <i>La Conférence des Parties adoptera la liste des décisions.</i>

DRAFT ORDER OF BUSINESS / PROJET D'ORDRE DES TRAVAUX

Date	Timetable/ Horaires	Agenda items/ points de l'ordre du jour
4/11/2025	9h30-18h00 CET	1 - 8
5/11/2025	9h00-16h00 CET	9 - 16

ANNEX II

LIST OF DECISIONS C198-COP 17TH PLENARY MEETING

At its seventeen meeting (Strasbourg/online, 04 – 05 November 2025), chaired by Ms Oxana GISCA (President of the Conference of the Parties, Republic of Moldova), the Conference of the Parties (COP) to the Council of Europe's Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS no. 198, hereafter "the Convention"):

1. heard the welcoming remarks of Ms Hanne Juncker, Director of the Security, Integrity and Rule of Law Directorate, who emphasized the Convention's ongoing relevance and its outreach. She underlined the importance of the COP's monitoring function and noted the growing interest from non-member states to join the Warsaw Convention, which celebrates its 20th anniversary this year. She encouraged State Parties to continue contributing to this important Council of Europe workstream;
2. adopted the agenda and order of business of the meeting as amended in terms of the timing of several items during day 2;
3. took note of the information provided by the President who emphasized important developments since the last plenary meeting. In accordance with the decision taken at the 16th Plenary meeting, the President informed the Plenary that she led online consultations in May 2025 with Armenia, Serbia, North Macedonia, Türkiye, and the Russian Federation, aimed at conveying high-level messages and supporting progress on the implementation of Articles 11 and 14, and Article 25 (2–3). The authorities of the respective countries provided updates on their legislative processes and domestic measures to address the outstanding requirements of these provisions. The President also informed the Plenary of other COP activities since the last meeting. In addition to the regular publication of horizontal reviews and follow-up reports, the COP participated in the Egmont Plenary Meeting (Luxembourg, 6–11 July 2025), where it organised a targeted workshop on asset recovery, together with the COP Scientific Expert and the Secretariat, and with contributions from Latvia, the United Kingdom, and Aruba. The workshop examined the added value of CETS No.198 in the global AML/CFT and asset recovery framework, and was attended by FIUs, non-member states, and international organisations including the IMF and the FATF;
4. took note of the information provided by the Executive Secretary regarding the COP's activities/achievements since the 16th plenary in terms of outreach and technical assistance to non-Council of Europe member states, which aspired to join the Convention;
5. took note of the information provided by the President on the Committee of Minister's decision on the request by Kazakhstan to be invited to sign and ratify the Warsaw Convention. Namely, the Plenary was informed that, at its 1524th meeting (2 April 2025), the Committee of Ministers agreed to invite Kazakhstan to accede to the Warsaw Convention, with the decision valid for five years and subject to financial contribution under CM/Res(2022)6. She noted that no further action has yet been reported by Kazakhstan and encouraged the country to proceed with accession.

6. heard an update from the representatives of the Netherlands and the United Kingdom which extended the application of the Convention to their respective territories of Curaçao and Gibraltar;
7. took note of the information provided by the Secretariat on changes to the declarations and reservations since the 16th plenary meeting, and update provided by Slovenia as regards to their reservation to article 3(4);
8. took note of information provided by Latvia, Italy, Montenegro, the Netherlands and the United Kingdom on recent legislative developments, major cases of co-operation among States Parties and asset confiscation and management practices, and invited State Parties to continue supporting the implementation of the Convention through similar activities in the future and inform the plenary on these developments;
9. examined the UK Crown Dependency of Jersey's implementation of the Convention under thematic monitoring review, pursuant to Article 19bis of the Rules of Procedure, and adopted the report as amended during the plenary discussion;
10. examined the UK Crown Dependency of Isle of Man's implementation of the Convention under thematic monitoring review, pursuant to Article 19bis of the Rules of Procedure, and adopted the report as amended during the plenary discussion;
11. took note of the presentation by Mr Cornel-Virgiliu Călinescu (Romania), Chair of PC-RAC, on the draft Additional Protocol to CETS No.198 and its main advances, including new forms of confiscation, strengthened access to information and urgent powers for AROs. The COP expressed appreciation for the work carried out, including by the COP scientific experts following the process, and noted broad support from delegations for the text as agreed by the PC-RAC;
12. heard presentations of new candidates for the elections of the Bureau member, and decided to re-elect Ms Oxana Gisca (Republic of Moldova) as President and Ms Claudia Elion as Vice-President (the Netherlands), and elected Ms Branka Glojnaric (Slovenia), Mr Dainis Vebers (Latvia), and Mr Ian McDonald (UK), as Bureau members.
13. adopted the follow-up report prepared by the Secretariat on articles 11, 25 (2 and 3), and 14 and took into account the updates and discussions regarding one or more of these articles by Armenia, North Macedonia, the Russian Federation, Serbia and Türkiye; decided to introduce some modification in the report in relation to the Russian Federation (articles 11 and 14), and adopted the follow-up report as amended; decided to take additional measures involving sending a letter from the Secretary General of the Council of Europe;
14. adopted the follow-up report on articles 7(2(c)) and 19(1), and decided to adopt the report with modifications to be included in respect of Austria and Türkiye. Invited Spain to provide additional information based on the country's intervention during the plenary, with a view to amend the report at the next plenary meeting.
15. adopted the follow-up report on article 3(4), and decided to adopt the report with modifications as agreed during the plenary in respect of Spain;

16. reviewed the 2024-2026 Objectives & priority actions and decided to entrust the Bureau and the secretariat to propose possible changes in the RoPs in relation to follow up reports. Agreed to invite Gibraltar and Curaçao to consider being the next jurisdictions to undergo thematic monitoring reviews. Alternatively, review of the existing thematic monitoring review would be made and this decision would be entrusted to the Bureau once feedback is received from Gibraltar and Curaçao; decided to ask the secretariat and scientific experts to prepare the Interpretative Note on Article 7(2c) of the Convention; took note of the presentation on the awareness raising activities in relation to the Warsaw Convention by the Economic Crime and Cooperation Division of the Council of Europe.
17. heard presentations of cases and jurisprudence from Italy, Malta, the Netherlands, the COP and the Council of Europe scientific experts on the practical implementation of Article 10 regarding corporate liability;
18. took note of the presentation by the FATF Secretariat on the recently adopted Asset Recovery Guidance, and key areas to which the COP experts provided inputs;
19. took note that no other businesses and issues were raised by delegations;
20. decided to hold its next meeting in Strasbourg in 2026;
21. adopted the list of decision;

ANNEX III

LIST OF PARTICIPANTS / LISTE DES PARTICIPANTS

ALBANIA	Ina ZOGU	Specialist/ International Relations Sector Coordination and Legal Directorate Albanian Financial Intelligence Agency
ARMENIA	Aram KIRAKOSSIAN	Head of the International Relation Division of the Financial Monitoring Center of the Central Bank of Armenia
	Edita NERSISYAN	International Relations Expert International Relation Division of the Financial Monitoring Center of the Central Bank of Armenia
AUSTRIA	Mag. Christina RATH	Federal Ministry of Justice Directorate General for Criminal Law, Unit IV 2
AZERBAIJAN	Azer ABBASOV	Deputy Chairman of the Executive Board of Financial Monitoring Service
	Mehman ALIYEV	Head of Legal Department Financial Monitoring Service
	Amrah RAHMANOV	Legal Department Legislation and Proceedings Division
BELGIUM	Jean Sébastien JAMART	Attaché juridique, Service Public Fédéral Justice
BOSNIA and HERZEGOVINA	Adnan DLAKIĆ	Expert Adviser for Combating Corruption
BULGARIA	Atanas MLADENOV	Deputy to the Permanent Representative Permanent Representation of the Republic of Bulgaria
CROATIA	Željka KLJAKOVIC GASPIC	Chief inspector, Ministry of the Interior, ARO office
	Danka HRŽINA	Deputy Municipal State Attorney in Zagreb
CYPRUS	APOLOGIZED	
DENMARK	APOLOGIZED	
ESTONIA	APOLOGIZED	
FRANCE	Cécile FAUCHERRE	Magistrate Cheffe de la mission GAFI - Ukraine Bureau de la lutte contre la criminalité organisée, le terrorisme et le blanchiment (BULCO)
GEORGIA	Tamta KLIBADZE	Head of Secondary Unit at Methodology, International and Legal Department of Financial Monitoring Service of Georgia

	Aleksandre MUKASASHVILI	Deputy Head of the Investigation Division, General Prosecutor's Office of Georgia
GERMANY	APOLOGIZED	
GREECE	Mr Dimitrios Apostolas	Assistant Financial Crime Prosecutor, Deputy Public Prosecutor at the Court of First Instance of Athens
HUNGARY	Dr Iván Ákos BUJDOS	Senior legal advisor Department of Criminal Law Codification, Deputy Secretariat of State for Criminal Law Legislation Ministry of Justice
ITALY	Liana ESPOSITO	Magistrate at the National Directorate "Antimafia ed antiterrorismo"
LATVIA	Indra AIZUPE-DZINTARE	Director of Criminal Law Department, Ministry of Justice
	Danis VEBERS	Advisor Financial Intelligence Unit of Latvia
LITHUANIA	Živilė ŠADIANEC	Chief Investigator of Compliance Division Money Laundering Prevention Board, Ministry of Interior
	Jūratė RADIŠAUSKIENĖ	Prosecutor of Criminal Prosecution Department, Prosecutor General's Office of the Republic of Lithuania
MALTA	Dr Dejan DARMANIN	Lawyer, Office of the Attorney General
	Mr Neil Zammit	Manager – Asset Management, Asset Recovery Bureau
MOROCCO	APOLOGIZED	
REPUBLIC OF MOLDOVA	Oxana GISCA President of the COP	Office of Prevention and Fight Against Money Laundering Government of Republic of Moldova
	Elena LUPAN	Chief inspector, FIU Moldova
	Eduard VARZAR	Prosecutor, Cybercrime Department, General Prosecutor's Office
MONACO	Pierre-Elie LESCHIERA	Chef de Section, Département de Justice
MONTENEGRO	Branimir JANJEVIĆ	Supreme Prosecutors office of Montenegro

NETHERLANDS	Annig ROGAAR	Senior officier van justitie kwaliteit Functioneel Parket Amsterdam, Team Fraude
	Claudia ELION Vice-president of the C198-COP	Senior policy advisor on international affairs, Fiscal Intelligence and Investigation Service, Tax Administration Utrecht
NORTH MACEDONIA	Gordana MILEVSKA	Head of unit Unit for international legal assistance in criminal matters, Department for International Legal Assistance
	Daniela RISKOVSKA	Adviser, Unit for international legal assistance in civil matters, Department for International Legal Assistance
POLAND	Paweł KACZOR	Head Judge of the International Control Mechanisms Division of the Department of International Cooperation and Human Rights
	Ewa SZWARSKA-ZABUSKA	Chief Specialist International Cooperation Unit Department of Financial Information/ Polish FIU, Ministry of Finance
PORTUGAL	APOLOGIZED	
ROMANIA	Cornel Virgiliu CALINESCU President of the PC-RAC	General Director, National Agency for the Management of Seized Assets
	Sorin TANASE	Department of Crime Prevention Ministry of Justice
RUSSIAN FEDERATION (online)	Alexey LYZHENKOV Head of Delegation	Deputy Director Department on the Issues of New Challenges and Threats Ministry of Foreign Affairs of the Russian Federation
SAN MARINO	Adriano SILDARELLI Head of delegation	Law Commissioner - Magistrate address: Via 28 Luglio 194, 47893 Borgo Maggiore, San Marino
SERBIA	Ms Neda MARKOVIĆ	Head of the Criminal Law Group, Sector for Normative Affairs, Ministry of Justice
	Ms Maja MATIJA RISTIĆ	Head of the Civil Law Group, Sector for Normative Affairs, Ministry of Justice
SLOVAK REPUBLIC	Ladislav MAJERNÍK Head of Delegation	Prosecutor, head of delegation General Prosecutor's Office of the Slovak Republic International Department

	Michal PAVLÍK	Head of Asset Recovery Unit, Financial Investigation Department, National Headquarters for Special Types of Crime, Presidium of the Police Force
SLOVENIA	Ms Branka GLOJNARIC Head of Delegation	Office for Money Laundering Prevention of the Republic of Slovenia
	Mr. Klemen PRINCES	Ministry of Justice
SPAIN	Ms Luisa García IGLESIAS	Prosecutor, Advisor, directorate general of International Legal Cooperation of the Ministry of the Presidency, Justice and Relations with the Parliament
SWEDEN	APOLOGIZED	
TÜRKİYE	Gülnihal KAYNAK AKCEVİZ	Rapporteur Judge Ministry of Justice
	Hilâl AYAN	Rapporteur Judge Ministry of Justice
	Selin ERDEVİREN	Deputy to the Permanent Representative, Strasbourg
UKRAINE	Oleh BELISOV	Head of the Virtual Assets Financial Investigations Unit of the Department of the Financial Investigations with Foreign FIUs
	Anatolii KOROLIUK	Leading expert of the Division for Conclusion of International Treaties on Legal Assistance, Department of International Legal Assistance, Ministry of Justice
UNITED KINGDOM	Ms Tia DUGGAN	Head of International Asset Recovery
	Ms Ursula MONCRIEFF	Senior Policy Adviser on International Asset Recovery
	Mr Ian MCDONALD	Head of Delegation, Government of Jersey
	Ms Jillian Christian	Head of Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT), Policy Office, Isle of Man
SPEAKER	Martin POLAINE (online)	Amicus Legal Consultants

STATUTORY PARTICIPANTS		
FATF	Francesco POSITANO (online)	Senior Policy Analyst
	Marybeth.GRUNSTRA (online)	Policy Analyst

SCIENTIFIC EXPERTS	
Paolo COSTANZO APOLOGIZED	Head Analysis and Institutional Relations Directorate Financial Intelligence Unit, Banca d'Italia
Ioannis ANDROULAKIS	Advisor to the Hellenic Ministry of Justice, Assistant Professor of Criminal Law & Criminal Procedure University of Athens

COUNCIL OF EUROPE SECRETARIAT	
Hanne JUNCHER	Director Directorate of Security, Integrity and Rule of Law
Livia STOICA BECHT	Head of Economic Crime and Corruption Department
Milan NIKOLIC	Committee of Experts on Criminal Asset Recovery (PC-RAC)
C198-COP SECRETARIAT	
Lado LALICIC	Executive Secretary of the Conference of the Parties to CETS 198
Ana BOSKOVIC	Administrator
Marie-Laure DUSSART	Administrator
Danielida WEBER	Administrative assistant to C198-COP
Solène DESCAMPS	Administrative assistant

INTERPRETERS
Sylvie BOUX Célia RAWINSKI