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**COMMITTEE OF EXPERTS
ON THE EVALUATION OF ANTI-MONEY LAUNDERING MEASURES
AND THE FINANCING OF TERRORISM**

MONEYVAL



**56th PLENARY MEETING
Strasbourg, 3-6 July 2018**

MEETING REPORT

MEMORANDUM

Prepared by the MONEYVAL Secretariat

Executive Summary

During the 56th Plenary meeting, held in Strasbourg from 2-6 July 2018, the MONEYVAL Committee:

- adopted the 5th round mutual evaluation report and its executive summary on Albania, and decided to subject the country to the enhanced follow-up procedure;
- adopted the 5th round mutual evaluation report and its executive summary on Latvia, and decided to subject the country to the enhanced follow-up procedure;
- adopted the follow-up reports by Armenia and the UK Crown Dependency of the Isle of Man under the 5th round of mutual evaluations;
- adopted the 4th round compliance reports of Bulgaria and Poland under the Compliance Enhancing Procedures (CEPs), and decided to both lift CEPs for the countries and remove them from the follow-up procedure;
- adopted the 4th round compliance report of Croatia under the CEPs, and invited the country to submit a further report at the 57th Plenary in December 2018;
- adopted the 4th round compliance reports of the Slovak Republic under the CEPs, and decided to suspend CEPs in light of the forthcoming 5th round mutual evaluation of the country which commences in autumn 2018 and which will sufficiently cover the outstanding issues from the 4th round;
- adopted the 4th round follow-up report by Romania and decided to apply Step 1 of CEPs with regard to the country;
- adopted the 4th round follow-up reports by “The former Yugoslav Republic of Macedonia” and Liechtenstein and invited both countries to submit further follow-up reports at the 57th Plenary in December 2018 while seeking removal from the follow-up process;
- adopted a report on the Voluntary Tax Compliance Programme of San Marino;
- held a panel discussion on “Practical recommendations on how to prepare a country assessment – lessons learnt from the first nine MONEYVAL mutual evaluations in the fifth round”;
- heard a number of presentations and held exchanges of views on issues such as: recent changes to the FATF standards; how to break the anonymity of virtual currencies; the assessment of risk of terrorist financing in financial centres; the new EU directive on anti-money laundering and terrorist financing; the role of financial intelligence units (FIUs) in investigating corruption; gender-related aspects of committing human trafficking and related money laundering; as well as a practical case-study on a successful conviction for terrorist financing;
- discussed and adopted a Secretariat paper on a regional Counter-terrorist Financing Operational Plan, to be further considered in December 2018.

Reports adopted will be made available shortly under each jurisdiction's profile, in accordance with MONEYVAL's publication policy.

The Committee of Experts on the evaluation of anti-money laundering measures and the financing of terrorism (MONEYVAL) held its 56th Plenary meeting from 2-6 July 2018 in Strasbourg under the presidency of Mr Daniel Thelesklaf (Liechtenstein). The first day of the Plenary was fully devoted to MONEYVAL's Working Group on Evaluations (WGE). The agenda of the meeting is attached as Appendix I, MONEYVAL's calendar of activities is attached as Appendix II, and the list of participants is attached as Appendix III.

Day 1: Tuesday 3 July 2018

Agenda item 1 – Opening of the Plenary Meeting

1. The Chair, Mr Daniel Thelesklaf, opened the Plenary by welcoming all participants.
2. Mr Jan Kleijssen, Director of Information Society and Action against Crime, welcomed the participants and noted that this would be the first Plenary for which two 5th round mutual evaluation reports were scheduled. Mr Kleijssen also informed the Plenary about the overall financial situation of the Council of Europe and the reasons for the first Plenary in 2018 to be held in July and for a whole week.
3. Mr Kleijssen welcomed the scheduling of a panel in the afternoon on reflecting and stocktaking of the first nine evaluations in the new evaluations. He reported from the joint workshop held in March 2018 in Strasbourg on challenges and best practices for judges and prosecutors in investigating/prosecuting money laundering and terrorist financing (see below, agenda item 3). Mr Kleijssen also thanked the Chair for his recent initiative to hold further workshops on de-risking with global banks as well as financial institutions from MONEYVAL jurisdictions.

Agenda item 2 – Adoption of the agenda

4. The Committee adopted the agenda as circulated (see Appendix I).

Agenda item 3 – Information from the Chairman

5. The Chair informed the Plenary about the correspondence with MONEYVAL jurisdictions since the 55th Plenary in December 2017. He noted a new record number of more than 240 participants which had registered for the Plenary.
6. He also informed the Plenary about his mission to Belgrade in April following the FATF February 2018 Plenary and the decision to maintain Serbia in the ICRG process (see below, agenda item 4). The mission had been organised upon invitation of the Vice-Prime Minister of Serbia. The Chair noted positively the progress already made by Serbia and the commitment of the country in achieving further progress on the recommended actions in the 2016 mutual evaluation report. A member of the Secretariat had accompanied the Chair at that occasion.
7. The Chair then informed the Plenary about the continuation of activities in order to address the phenomenon of de-risking, which raises concerns for MONEYVAL given that it has particularly affected in recent years the geographical area of its membership. MONEYVAL had reached out to a great number of global financial institutions to discuss the issues and the role and use of its evaluations (e.g. by taking into accounts the reports when taking decisions on whether to enter into business relationships with banks in a given country) already in autumn 2017 with workshops in New York City and Washington D.C. This series of workshops had continued in March and April 2018 with workshops in

Frankfurt/Main (kindly hosted by Deutsche Bank) and London (kindly hosted by UK Finance). The Chair stated that MONEYVAL would continue to monitor the situation and plan further activities for the future if necessary. This received a lot of positive support from the Plenary which warmly thanked the Chair for the initiative.

8. The Plenary was further informed that on 26-27 March 2018, MONEYVAL had organised - together with the Financial Action Task Force (FATF) and the Organisation for Security and Cooperation in Europe (OSCE) - a regional workshop for prosecutors and judges. This workshop, which had been held also in other regions of the world as part of the Argentinian FATF presidency, provided a platform for gathering and sharing experiences, challenges and best practices in investigating and prosecuting money laundering and terrorist financing, as well as depriving criminals of their proceeds. 100 participants from 43 different states and territories in Europe and Central Asia attended the event, which was held in Strasbourg. The workshop had been co-chaired by the FATF President, Mr Santiago Otamendi, and the Chair of MONEYVAL. The Chair warmly thanked the outgoing FATF President for this initiative, and referred all delegations to the comprehensive outcome document of all regional workshops which had just been adopted by the FATF June 2018 Plenary (and which is available on the restricted MONEYVAL website).
9. The Chair informed the Plenary that he had attended the inter-ministerial Conference "No money for terror", which took place in Paris on 25-26 April 2018 upon invitation by French President Macron. The conference had been attended by more than 50 ministers and 500 experts from nearly 80 countries. It discussed ways and means to strengthen the efficiency of action against terrorism financing, on the basis of the work accomplished and past experiences. A common declaration adopted at the end of the conference by the attending ministers aimed to step up the national and collective involvement in the fight against the financing of terrorist entities, groups and individuals. In that declaration, the ministers committed to reinforcing the mutual evaluation processes, by giving the FATF and "FATF-style regional bodies" such as MONEYVAL the necessary resources to that end. It also called for increased transparency, in particular to address the risks potentially arising from the use of new technologies.
10. The Chair also informed the Plenary about his exchange of views with the Committee of Ministers, on the occasion of the presentation of MONEYVAL's annual report 2017, on 30 May 2018. The annual report 2017 is available on the MONEYVAL website; a number of print copies were distributed at the Plenary.

Agenda item 4 – Information from the Secretariat

11. The Executive Secretary informed the Plenary about MONEYVAL's calendar of activities for 2018, which is attached as Appendix II to this report. This concerned in particular the country trainings for Gibraltar (April) and Cyprus (May), as well as the on-site visits to the Czech Republic (March) and Lithuania (May). Moreover, he reported from an assessor training workshop in Larnaca (Cyprus) which was jointly organised with the FATF. 48 prospective assessors (33 from MONEYVAL jurisdictions and 15 from FATF jurisdictions) received training on the 2012 FATF Recommendations and the 2013 FATF Methodology. He extended his gratitude to the Unit for Combating Money Laundering (MOKAS) of Cyprus for hosting this event, as well as to the trainers (Mr John Ringguth, Mr Yehuda Shaffer and Mr Richard Walker) for their invaluable input and their longstanding commitment to MONEYVAL activities.
12. He then reported from the FATF Plenaries in February and June 2017, in particular about decisions which directly affected MONEYVAL. This concerned, *inter alia*, the finalisation of the 5th round follow-up report of Hungary, where the rating of "largely compliant" on R.6

had been challenged by two delegations in the “quality and consistency review”. However, upon discussion within the FATF, it had been agreed that the rating would remain with a number of amendments made which would reflect the FATF discussion (and which the MONEYVAL Plenary adopted in a written procedure in February 2018). The report has meanwhile become final and was published on the MONEYVAL website. The FATF has also decided in February that Serbia would remain within the ICRG process (with the adoption of an action plan and a related text on the FATF website). In this process, the FATF Joint Group for Europe and Eurasia held a meeting with Serbia on 1 June 2018 which was co-chaired by the MONEYVAL Chair and was also attended by the MONEYVAL Secretariat. With regard to Hungary, the FATF had decided that the country had made sufficient progress during its observation period to be referred back to the MONEYVAL follow-up process, where the country remains in enhanced follow-up and will report back in December 2018. Following an on-site visit in the context of the ICRG process of a previous mutual evaluation round, the FATF had also decided in February 2018 to remove Bosnia and Herzegovina from the ICRG process in light of sufficient progress made. The Plenary congratulated both Hungary and Bosnia and Herzegovina for these developments, and the Secretariat thanked both countries for their very good cooperation throughout the processes.

13. The Executive Secretary informed the Plenary about the attendance of Secretariat staff in other forums, as well as about the staff situation. He introduced a new administrator, Mr Jeremie Ogé, who has been seconded from Luxembourg for one year. A new secondment vacancy is currently being filled. The Executive Secretary thanked the delegations of San Marino and the Slovak Republic for recent voluntary contributions and warmly invited all MONEYVAL delegations to consider making such voluntary contributions. These would allow the Secretariat to recruit additional staff which is urgently needed to accelerate the current round of mutual evaluations.

Agenda item 5 – Compliance Enhancing Procedures (CEPs)

5.1 Report from Bulgaria under step 1 of the Compliance Enhancing Procedures

14. Bulgaria was put under Step 1 of the Compliance Enhancing Procedures (CEPs) by the 55th Plenary in December 2017 because the country had not fulfilled the conditions for removal from the follow-up process (Rule 13, paragraph 4 of MONEYVAL’s rules of procedure) four years after the adoption of the 4th round MER. The country submitted its first compliance report at the present Plenary.
15. The Secretariat introduced its analysis in which it concluded that Bulgaria had made further progress on the outstanding deficiencies on Recommendation (R.3) and Special Recommendation II (SR.II) by adopting amendments to the Criminal Code as well as other legislation (for more information, see document MONEYVAL(2018)5.1-ANALYSIS). This led the Plenary to conclude that, for the purposes of the 4th round of mutual evaluations, the country had brought the level of compliance for these two recommendations to a level of “largely compliant”. Nevertheless, the Plenary encouraged Bulgaria to make further progress on the remaining deficiencies as outlined by the Secretariat in its analysis in view of Bulgaria’s forthcoming 5th round mutual evaluation. The Plenary noted that these two recommendations were the last outstanding Key and Core recommendations for fulfilling the conditions for removal from the 4th round follow-up process.

Decision taken

16. In view of the result of the discussions of the report, the Plenary considered that Bulgaria had taken sufficient steps to be removed from CEPs in light of the progress made, in

particular with regard to R.3 and SR.II. At the same time, the Plenary considered that Bulgaria had fulfilled the conditions for removal. The Plenary consequently removed Bulgaria from the 4th round follow-up process and decided that Bulgaria should regularly inform MONEYVAL through the *tour de table* procedure on further progress.

5.2 Report from Croatia under step 1 of the Compliance Enhancing Procedures

17. Following the adoption of the 4th round MER in September 2013, Croatia was placed in regular follow-up. Since then Croatia has submitted four follow-up reports between 2015 and 2017. At the 54th Plenary (26-28 September 2017), the Plenary decided to move Croatia to enhanced follow-up and apply Step 1 of Compliance Enhancing Procedures (CEPs).
18. The present Plenary considered the first full compliance report by Croatia under CEPs (as the report to the December 2017 had only concerned a report about progress on the draft AML/CFT Law). By reporting on progress made since December 2017, the Croatian delegation announced that a new AML/CFT Law had been adopted (to implement the 4th EU AML/CFT Directive). Moreover, amendments to the Criminal Code had been drafted to address a number of deficiencies concerning Core, Key and other Recommendations rated as "partially compliant".
19. The Secretariat confirmed that, with the adoption of a new AML/CFT Law and the Law on Financial Operations and Accountancy of NPOs, a number of important deficiencies were addressed, notably in relation to R.6, R.7, R.17, R.22, R.32, R.33 and SR.VIII. Moreover, the Plenary noted that in June 2018 the Law on the Amendments of the Criminal Code had been adopted at governmental level and had been subsequently sent to Parliament. Once in force, it would address the large majority of technical deficiencies under R.1.
20. However, the Plenary also noted that there still remained deficiencies with regard to R.1, R.3, R.5, R.23, R.35, SR.I, SR.III, R.12, and R.16. For that reason, the Chair, after consultation with the Bureau, proposed the application of Step 2 of CEPs. While a number of delegations supported this proposal, the majority of delegations which took the floor opined that Croatia should be given again extra time in light of on-going legislative processes and that such a decision should not be taken yet at this Plenary. In the absence of a consensus, Croatia remained at Step 1 of CEPs for the time being.

Decision taken

21. The Plenary took the view that Croatia is making some progress, but it has still a large number of outstanding deficiencies which relate to a number of Core, Key and other recommendations. This concerns R.1, R.3, R.5, R.23, R.35, SR.I, SR.III, R.12 and R.16. The Plenary urged Croatia to use the additional time given until December 2018 to address all outstanding deficiencies which fall into the scope of the Criminal Code (in particular those which have not yet been included in the draft amendments to the Criminal Code, as outlined in the Secretariat analysis (document MONEYVAL(2018)4_ANALYSIS)). The Plenary also urged Croatia to review its AML/CFT Law with regard to outstanding deficiencies in a number of relevant Core recommendations (as also outlined in the Secretariat analysis). Should the remaining significant deficiencies not be addressed by the time of the 57th Plenary in December 2018, to which Croatia should be invited to report back, the Plenary would consider the adoption of Step 2 of CEPs.

5.3 Report from Poland under step 1 of the Compliance Enhancing Procedures

22. MONEYVAL adopted the mutual evaluation report of Poland under the 4th round of

mutual evaluations at its 41st Plenary meeting (April 2013). Poland was placed into regular follow-up and has submitted in total six follow-up reports. In September 2017, the Plenary decided to apply Step 1 of Compliance Enhancing Procedures (CEPs), due to delays in the adoption process of the draft AML/CFT Law, which is expected to address the outstanding deficiencies in relation to preventive measures (R.5, R.13 and SR.IV) as well as the deficiencies in relation to targeted financial sanctions (SR.III).

23. At the time of the first compliance report in December 2017, the legislative process for the draft AML/CFT law had slightly progressed but not yet been completed. Poland was therefore urged to complete the legislative process by the time of the 56th Plenary in order to avoid the application of Step 2 of CEPs. In its second compliance report, the Polish delegation informed the Plenary about the progress made since the last Plenary. The Secretariat introduced its analysis (see document MONEYVAL(2018)5.3_ANALYSIS) and concluded that the new AML/CFT law, adopted by the Polish Parliament in March 2018, rectifies most of the outstanding deficiencies identified in the 4th round MER relating to R.5, 13 and SR. IV.
24. The Secretariat analysis also concluded that Poland had achieved substantial progress with regard to other Core and Key recommendations. In particular, the amendments made to Articles 299 and 165a of the Criminal Code address major outstanding technical deficiencies, such as the criminalisation of the funding of terrorist organisations and individual terrorists for “any purpose” and the elimination of the purposive supplementary elements for some of the acts constituting offences in the treaties annexed to the terrorist financing (TF) Convention. Consequently, the Secretariat considered that Poland has brought all outstanding Core and Key recommendations to a level of “largely compliant”, as required by the removal-conditions in Rule 13, paragraph 4 of MONEYVAL’s 4th round rules of procedure.

Decision taken

25. In view of the result of the Secretariat analysis and the discussions of the report, the Plenary agreed that Poland had taken sufficient steps to be removed from CEPs. At the same time, the Plenary considered that Poland had fulfilled the conditions for removal from the 4th round follow-up process under Rule 13, paragraph 4 of MONEYVAL’s rules of procedure. The Plenary consequently removed Poland from that follow-up process. Nevertheless, the Plenary urged Poland to make further progress on the remaining deficiencies as outlined by the Secretariat in its analysis in view of Poland’s forthcoming 5th round mutual evaluation. The Plenary also decided that Poland should regularly inform MONEYVAL through the *tour de table* procedure on such progress.

5.4 Report from the Slovak Republic under step 1 of the Compliance Enhancing Procedures

26. Following the adoption of the 4th round MER in September 2011, the Slovak Republic was placed in regular follow-up. The country submitted in total seven follow up reports between 2012 and 2017. At the 53rd Plenary (30 May – 1 June 2017), the Plenary decided to apply Step 1 of the Compliance Enhancing Procedures (CEPs) with regard to the Slovak Republic. Even though the Slovak Republic had made sufficient progress on all other outstanding Core and Key recommendations, the Plenary noted that there were still deficiencies with regard to Special Recommendation III (SR.III) and Recommendation 26 (R.26). At the present Plenary, the country submitted its second compliance report (following the first compliance report of December 2017).
27. The Plenary considered that, with the adoption of the amendments to the “Act on the implementation of the international sanctions” in January 2018, the Slovak Republic had

demonstrated sufficient progress on SR.III which made it overall unnecessary for the Plenary to revert to any additional steps in the CEPs. At the same time, some deficiencies - in particular with regard to R.26 - remained outstanding.

28. Therefore, the Plenary regarded Rule 13, paragraph 8 (as revised in April 2016) of MONEYVAL's 4th round Rules of Procedure which states that "[r]eporting under this follow-up procedure will be discontinued upon commencement of the 5th round process (i.e. within one year of a 5th round on-site visit)". The Plenary noted that the on-site visit for the Slovak Republic in the 5th round of mutual evaluations is envisaged for the second half of 2019, with the country training to be held and the evaluation process to commence in October 2018. Given that the next MONEYVAL Plenary takes place in December 2018, the Plenary decided to suspend the CEPs once the official preparations for the Slovak Republic's evaluation have commenced in October 2018. The Plenary invited the Slovak Republic to provide an update on developments through the *tour de table* procedure. It further agreed that the Secretariat will draw the attention of the future assessment team to the outstanding deficiencies under R.26, with a view to discussing them with the authorities during the on-site visit to the Slovak Republic in 2019.

5.5 Report from Montenegro under step 2 of the Compliance Enhancing Procedures

29. The Secretariat introduced the analysis of the sixth compliance report submitted by the Montenegrin delegation. It recalled that at its 54th meeting the Plenary was broadly satisfied that the high-level mission conducted on 3-4 May 2017 (Step 2 of the Compliance Enhancing Procedures (CEPs)) has had a positive effect and triggered an accelerated legislative action. However, since some significant deficiencies (both technical and effectiveness-related) were outstanding, the Plenary requested Montenegro to report back to the Plenary on the remaining deficiencies ahead of the 56th Plenary in July 2018. It was therefore decided to maintain Montenegro under Step 2 of the CEPs. To facilitate the process, it was agreed that the Secretariat would take stock of the remaining deficiencies immediately after the Plenary meeting and submit a memorandum containing these deficiencies to Montenegro. It was decided that should Montenegro fail to meaningfully address the deficiencies identified in the MER by the 56th Plenary, the Plenary would consider applying Step 3 of the CEPs. Montenegro was also requested to provide a verbal update through the *tour de table* procedure at the 55th Plenary in December 2017 on the status of the Law on the Prevention of Money Laundering and Terrorist Financing ("LPMLTF"). At the 55th Plenary the Montenegrin delegation confirmed that the LPMLTF had been drafted and was awaiting comments from the European Commission.

30. The Secretariat provided an overview of the progress made by Montenegro since the 55th Plenary. It was reported that the LPMLTF and other pieces of legislation had been adopted by Parliament. As a result, the vast majority of remaining deficiencies in relation to R.5, R.13/SR.IV, R.23, R.26, R.40, SR.I and II were addressed to a satisfactory level. However, the Law on International Restrictive Measures ("LIRM"), intended to address the most serious deficiencies under SR.III, although approved by the Government had not yet been adopted by Parliament by the end of June 2018. This was despite the political commitment made during the high-level mission in May 2017, indicating that the law would be adopted before the 54th MONEYVAL Plenary in September 2017 and the call upon Montenegro by MONEYVAL at the 55th Plenary in December 2017 to address the most significant deficiencies by the 56th Plenary meeting at the very latest.

Decision taken

31. The Plenary positively noted the progress made by Montenegro through the adoption of the LPMLTF and other pieces of legislation. However, it voiced significant concern that

the LIRM had not yet been adopted and urged Montenegro to proceed with its adoption by 31 July 2018. The Plenary had regard to the latest information provided by the Montenegrin delegation that the process in Parliament is at an advanced stage. It further took into consideration the meeting with Members of Parliament during the high-level mission in 2017, which had discussed the possibility of an accelerated legislative procedure which would allow for the adoption of the LIRM within such a timeframe. Failing the adoption of the LIRM by 31 July 2018, the Plenary decided to place Montenegro under Step 3 of CEPs if this condition (i.e. failure to adopt the law) would be met. Step 3 of CEPs would involve the publication of a statement on 1 August 2018, a draft of which was also adopted by the Plenary. Irrespective of that decision, Montenegro was invited to report back under CEPs to the 57th Plenary in December 2018.

Update after the Plenary

32. The Parliament of Montenegro adopted the LIRM on 27 July 2018. As far as the MONEYVAL Secretariat was informed, there were no further changes to the draft version which had formed the basis for Secretariat analysis presented to the 56th Plenary on 3 July 2018. In accordance with the decision taken by the Plenary on that day, Step 3 of CEPs (in the case of failure to adopt the law before 31 July 2018) is not applied. In view of these developments and in line with the decision of the Plenary, Montenegro will remain under Step 2 of the CEPs and will be requested to report back on any outstanding deficiencies at the 57th Plenary in December 2018.

Agenda item 7: Practical recommendations on how to prepare a country assessment – lessons learnt from the first nine MONEYVAL mutual evaluations in the fifth round

33. In order to reflect on practical approaches and experiences from the first nine MONEYVAL mutual evaluations in the 5th round, a panel was organised to take stock of the lessons learnt from these evaluations. The purpose of the Panel was to provide insights from various stakeholders in a mutual evaluation, including assessed countries, evaluators and the FATF/FSRB Secretariats.
34. Presentations were provided by Mr Francesco Positano (Policy Analyst at the FATF Secretariat), Mr Michael Stellini (Deputy Executive Secretary to MONEYVAL), Mr Dmitry Kostin (Administrator at the EAG Secretariat), Mr Ladislav Majernik (Prosecutor General of the Slovak Republic), Ms Maja Cvetkovski Head of Delegation of Slovenia) and Mr Igor Gaievskiy (Head of Delegation of Ukraine). The Plenary also heard the views of two representatives from the private sector, notably Ms Gabriele Dunker (Executive Director at the Financial Transparency Advisors) and Mr Thomas Iverson (Director at the Financial Integrity Network).
35. The purpose of the presentations and the subsequent panel discussion was to guide countries in the preparation of their 5th round mutual evaluation and provide them with useful recommendations on how to maximise their effectiveness while responding to the mutual evaluation challenges. The presentations were also divided by the period before, during and after the on-site visit.
36. All panel participants agreed on the importance of a good organisation and internal co-ordination already during the period before the on-site visit. In particular, countries undergoing an evaluation should communicate in an easily accessible and presentable way the available information (legal documents, statistics, case studies) to the evaluation team. In relation to the mutual evaluation questionnaires (MEQs), countries should sufficiently guide their authorities responsible for their completion in order to avoid inaccuracies and submit a detailed questionnaire. Regarding the technical compliance

MEQ, although “last minute” legislative changes are allowed by the rules of procedure, it is essential that these are communicated to the evaluation team on time. At this stage, the establishment of a contact point between the assessed country and the Secretariat is viable in order to ensure regular communication and observe the timelines. Internal co-ordination, with a high-level commitment, is also of significance as it guarantees smooth interplay of the authorities involved in the evaluation and unobstructed flow of information.

37. Internal co-ordination is also key to the period during the on-site visit. Countries undergoing an evaluation should carefully select and prepare the authorities to be interviewed by the assessment team on the topic and requirements of each meeting. The authorities should adopt a constructive approach towards the strengths and weaknesses of their system and be prepared to provide the assessment team with concrete information (case studies, statistics). Countries should take into account the short time of the on-site visit and the issue of the interpretation (simultaneous interpretation being more time-efficient than consecutive interpretation, but requiring technical facilities).
38. The ability of the assessed countries to respond to the assessment team's information requests is a standing issue both during and after the on-site visit. Countries should establish a mechanism to process and monitor such requests (online share-space or other automated systems). It is of significance that the countries which are undergoing an evaluation are well-prepared for all sorts of eventualities and adopt a proactive approach in order to achieve realistic recommendations.

Agenda item 7: Information on AML/CFT initiatives in MONEYVAL states and territories (tour de table)

39. The Plenary held a *tour de table* with regard to recent AML/CFT developments in its jurisdictions (for more information on the *tour de table* see forthcoming document MONEYVAL-Plenary 56(2018)INF7). Delegations continued to present short case-studies of interest, which was very welcomed by all participants.

Day 2: Wednesday 4 July 2018

Agenda items 8 and 9 – Discussion on the draft 5th round Mutual Evaluation Report on Latvia

40. The Chair opened the discussion of the draft Mutual Evaluation Report (MER) on Latvia. The Secretariat introduced the evaluation team and provided an overview of the key findings and priority recommended actions. The Co-Chairs of the Working Group on Evaluations summarised the discussions in the Working Group on Evaluations and presented the recommendations made to the Plenary on each key issue. An overview of the key issues which no longer needed to be discussed in the Plenary (as agreement had been reached by all participants in the Working Group on Evaluations) was provided for information.
41. *Key issue 1 (Immediate Outcome 1)*: Latvia presented a number of arguments to support a request for an upgrade from a “moderate” to a “substantial” rating under Immediate Outcome 1. As these changes primarily concerned changes which had been undertaken after November 2017, the evaluation team recalled that the assessment can only take into account the outcome of the efforts achieved at time of the on-site visit which had been conducted that month. In response to a query, the evaluation team highlighted that there were no substantiated conclusions on some risks, such as cross-border money

flows and terrorist financing, under the national risk assessment. There was no consensus to change the rating which consequently remained “moderate”.

42. *Key issue 2 (Immediate Outcome 4)*: The Plenary discussed whether major or fundamental improvements are needed in relation to Immediate Outcome 4. To that effect, it considered issues of consistency of the rating with other MERs. Whilst some delegations questioned the current rating of “moderate” and highlighted that gaps had been identified in applying mitigating measures, in particular related to the independence of the compliance function and the STR reporting performance, other delegations supported the current rating. In response to queries, the evaluation team explained that the financial sector is comprised of two parts: while one group of banks has very good knowledge of AML/CFT obligations, the other group of the banks also has knowledge of AML/CFT obligations, but this knowledge does not necessarily transform into action. The evaluation team further explained that deficiencies identified on the internal control are relevant for the second group of banks. The evaluation team also pointed out that there have been certain positive elements in the DNFBP sector related to auditors, notaries and - to lesser extent - to casinos. It also stated that the recommended actions and deficiencies in the key findings are not of fundamental nature. In the absence of a consensus on this issue, it was concluded that the rating of “moderate” effectiveness should remain.
43. *Key issue 3 (Immediate Outcome 3)*: The Plenary discussed Immediate Outcome 3 and finally decided that the “moderate” rating should remain. The following suggestions from the delegations under Immediate Outcome 3 were accepted by both the evaluation team and Latvia and hence endorsed by the Plenary: to slightly amend the second key paragraph under the key findings (market entry measures); to introduce a new recommended action on further enhancing consistent policy in monitoring on-going compliance with fit and proper requirements in case of failure of AML/CFT requirements, and taking measure in a reasonable timeframe to undertake assessment of non-resident deposit base and related cross-border flows; to amend the last recommended action (sanctions) and prioritise this specific recommended action in the list of actions; to amend the conclusion on Immediate Outcome 3.
44. *Key issue 4 (Immediate Outcome 5)*: Latvia requested to consider an upgrade for Immediate Outcome from a “low” to a “moderate” rating. The evaluation team outlined those areas where improvements were needed. In response to a query from the scientific expert, the evaluation team explained that basic information on registered owners is available. However, it does not assist the authorities to identify the identity of the beneficial owner of a company; hence having the basic information available as such is only a “small step”. The evaluation team highlighted that there was no clear way at the time of the on-site visit how the authorities were getting beneficial ownership information. While the delegations who took the floor supported the “low” rating, one delegation supported an upgrade. Absence of a consensus to change the rating, the Plenary eventually decided that the “low” rating should remain.
45. *Additional issues raised at the Plenary (Recommendation 29)*: Latvia requested that, in addition to the issues listed in the Key Issues Document, the rating for Recommendation 29 should be reconsidered by the Plenary. The delegation suggested that only criterion 29.7 is rated “partly met” (with all other criteria rated as “met”) and proposed to reconsider what weight was given to issues noted in relation to the autonomy of the financial intelligence unit (FIU) in the overall rating of R.29. The evaluation team pointed out that there had been some minor shortcomings related to access to information, the procedure for dismissal of the head of the FIU and doubts as to whether the AML/CFT Law fully ensures the operational independence and autonomy of the FIU. A large number of delegations supported a “largely compliant” rating for Recommendation 29.

The Plenary decided to upgrade Recommendation 29 to “largely compliant” (with the rating for criterion 29.7 remaining unchanged in order to reflect the issues raised by the evaluation team) and approved the proposed changes to the text aimed at clarifying the issue relating to the FIU’s power to provide information to LEAs upon their request; as well as removing the reference to the monitoring of accounts from the analysis.

Decision taken

46. The Plenary adopted the 5th round MER of Latvia and its executive summary, including the amendments agreed upon during the discussion and subject to further editorial changes. According to Rules 21 and 23 of MONEYVAL’s 5th Round Rules of Procedure, Latvia was placed in enhanced follow-up and requested to report back at the last Plenary in 2019. The report will be final and published after the quality and consistency review of the global AML/CFT network.

Agenda Item 10 - Fourth round follow-up: application by “The former Yugoslav Republic of Macedonia” to be removed from regular follow-up

47. Following the adoption of the 4th round MER, “The former Yugoslav Republic of Macedonia” was placed under regular follow-up and was asked to report back in an expedited manner in April 2015. Since then, “The former Yugoslav Republic of Macedonia” submitted four follow-up reports (April 2015, April 2016, December 2016 and July 2018 respectively) and was expected to seek to exit from the follow-up procedure in the first half of 2018.
48. The Secretariat presented its analysis of the fourth follow-up report and concluded that tangible progress had been achieved in addressing the shortcomings underlying SR.I, SR.II, SR.IV, SR.V, SR.III, R.5 and R.13. However, in relation to Key recommendation R.23, the progress did not yet cover sufficiently the concerns expressed in the 4th round MER.
49. Bearing in mind that the Plenary has a degree of flexibility on a removal-decision if deficiencies on a Key recommendation can be compensated by overall progress on “other recommendations” (i.e. those rated in the MER as “non-compliant”/“partially compliant” which are not Key and Core recommendations), as provided by Rule 13 paragraph 4 of the Rules of Procedures, the Secretariat proceeded to the analysis of the steps taken by “The former Yugoslav Republic of Macedonia” for those recommendations. From a desk-based analysis, the Secretariat stated that with regard to six recommendations (R.6, R. 5, R.21, R.29, SR.VI and SR.IX) substantial improvement had been achieved, while another six recommendations (R.12, R.16, R.17, R.24, R.25, and R.32) only moderate progress was noted, and in case of two further recommendations (R.33 and SR.VIII) it was unclear if any specific measures had been taken to address deficiencies. Therefore, the Secretariat opined that an overall assessment of these recommendations did not compensate for the outstanding deficiencies under R.23.
50. Consequently, the Secretariat took the view that “The former Yugoslav Republic of Macedonia” was not yet in a position to exit the regular follow-up procedure at this stage. Taking into consideration that the MER was adopted in April 2014, i.e. more than four years prior to the present follow-up report, the Secretariat suggested to the Plenary to consider the application of Compliance Enhancing Procedures on the basis of the Rule 13, paragraph 6 of the Rules of Procedure.

Decision taken

51. As the country's authorities clarified that the shortcomings identified in relation to R.23 were to be addressed in a pending legislative procedure which is expected to be finalised by December 2018, the Plenary decided to grant "The former Yugoslav Republic of Macedonia" additional time. The country should present further progress at the 57th Plenary in December 2018 and seek removal from the follow-up procedure at that stage.

Agenda item 11 - Fourth round follow-up: application by Liechtenstein to be removed from regular follow-up

52. MONEYVAL adopted the 4th round MER of Liechtenstein at its 44th Plenary meeting in April 2014. As a result, Liechtenstein was rated "partially compliant" on 8 Recommendations and was placed under the regular follow-up. Liechtenstein had previously reported back in September 2016.
53. The Secretariat's analysis concluded that Liechtenstein had made significant progress in addressing most of the identified deficiencies from the 2014 MER. While this had already been acknowledged by MONEYVAL at its 51st Plenary in September 2016 on the occasion of Liechtenstein's first follow-up report, the country had made further progress since then, including on the implementation of the effectiveness concerns related to R.1. Regarding R.5, the Plenary concluded that the technical shortcomings have been addressed and the rating can be considered as equivalent to a "largely compliant", while the effective implementation must be verified by the authorities through supervisory actions. On R.4, the Plenary considered that all the deficiencies identified in the 4th round MER have been addressed and that this also has an additional positive impact on the technical compliance with R.26 and R.40. Moreover, Liechtenstein strengthened its legal and regulatory framework for freezing and confiscating terrorist assets, although the country still lacks written procedures for domestic designations. The Plenary noted that the effective application remains to be assessed in the 5th round evaluation.
54. Overall, the Plenary found that Liechtenstein has taken sufficient steps to remedy the deficiencies identified under the Core and Key Recommendations rated "partially compliant" in the 4th round MER. Regarding R.1, Liechtenstein informed that further amendments to the Criminal Code are underway which aim to address outstanding deficiencies. In the light of the decision taken at the 51st MONEYVAL Plenary meeting for Liechtenstein to seek removal from the follow-up process in the second half of 2018, the Secretariat proposed to the Plenary to consider granting Liechtenstein extra time for continuing the progress towards the adoption of the amendments to the Criminal Code, and to decide on its application to be removed from the follow-up process at the 57th Plenary in December 2018.

Decision taken

55. The Plenary invited Liechtenstein to present further progress regarding R.1 (including on the legislative process) and eventually seek removal from the follow-up process at MONEYVAL's 57th Plenary in December 2018.

Agenda item 12 – Fourth round follow-up: application by Romania to be removed from regular follow-up

56. Following the adoption of the 4th round MER in April 2014, Romania was placed in regular follow-up. Since then, Romania has submitted two follow-up reports (in April 2016 and May 2017 respectively). Romania was invited to submit a further progress report and seek exit from the regular follow-up process at the 56th Plenary.

57. The Secretariat analysis of Romania's third follow-up report concluded at the outset that, despite some steps that had been undertaken, the majority of the deficiencies with regard to eight Core and Key recommendations had not yet been sufficiently addressed. These concerned notably R.5, R.13, R.23, R.26 and SR.I, SR.III and SR.IV. Significant improvement was noted only with regard to SR.II where the Secretariat concluded that the amendments to the Criminal Code had brought the compliance of this special recommendation to the level equivalent to "compliant" or "largely compliant".
58. The analysis also acknowledged certain improvements with regard to R.13 and R.26 resulting from the amendments to the current AML/CFT Law which had been approved in June 2017. In addition, the Secretariat considered a new draft AML/CFT Law which had recently been approved by the Government was reviewed and made a detailed assessment to what extent the actions recommended by the 2014 MER were incorporated therein. As a consequence, the analysis noted certain shortcomings and encouraged the authorities to consider them prior to the final adoption of the new AML/CFT Law.
59. The Romanian delegation informed the Plenary that it generally agreed with the Secretariat analysis and emphasised certain improvements made with regard to effective implementation of R.13 and R.26. Furthermore, the delegation briefly presented recent AML/CFT initiatives in the country, including the key features of the draft AML/CFT law. The delegation also informed the Plenary that the draft law already entered the parliamentary procedure whilst its adoption was expected in the near future.

Decision taken

60. The Plenary found that the country was not in a position to exit the regular follow-up procedure given that the majority of deficiencies remained. Seven out of eight core and Key recommendations still appear not to have been brought to the level equivalent to "compliant" or "largely compliant". Whilst Romania was encouraged to complete the ongoing AML/CFT legislative reform, the Plenary, mindful of Rule 13, paragraph 6 of the MONEYVAL 4th round Rules of Procedure and the fact that more than four years have passed since the adoption of the MER, decided to support the Chair's proposal to apply Step 1 of the Compliance Enhancing Procedures (CEPs). Romania was asked to report back at the 57th Plenary.

Agenda item 13 – Recent changes to the FATF methodology for R.18/21 (information sharing)

61. The Plenary heard a presentation by Mr Francesco Positano, representative of the FATF Secretariat, on the recent changes to Recommendations 18 and 21 and its interpretive notes and methodology, adopted by the FATF Plenary in November 2017 and February 2018 respectively. The changes concern information sharing. The amendments to the Interpretive Note to Recommendation 18 sought to clarify that information on unusual and potentially suspicious activity should be shared in the context of group-wide AML/CFT programmes – but that countries are not required to permit financial institutions to share STRs or disclose the fact that an STR has been submitted. Group-wide AML/CFT programmes may be informed about an STR, its underlying information or the fact that an STR has been submitted. The importance of sharing such information among group-wide AML/CFT programmes is high, as this enhances an adequate understanding of group-wide AML/CFT risks, and may identify riskier geographic regions, client segments, transactions and products that post the highest/most risks. Mr Positano elaborated upon various ways of information sharing in this respect.
62. The amendments to Recommendation 21 aimed at clarifying that tipping-off provisions

are not intended to inhibit information sharing as required under Recommendation 18. With all changes adopted, the FATF aimed to clarify the expectations of financial institutions for sharing information group-wide, including the sharing of information related to unusual or suspicious transactions within financial groups. The Chair, after the presentation, suggested to the MONEYVAL Secretariat to conduct a fact-finding exercise by way of circulation of a questionnaire among its jurisdictions, focusing on the question whether financial institutions in their jurisdictions have any restrictions in place on information sharing, and if so, what the rationale is behind such restrictions. The findings of this exercise will increase regional understanding of information sharing and disclose any necessary steps to be taken.

Agenda item 14 – Breaking the anonymity of virtual currencies: Presentation by Mr David Parody, British Overseas Territory of Gibraltar

63. The Plenary heard a presentation by Mr David Parody on the approach adopted in Gibraltar to regulate Distributed Ledger Technology (DLT). A distributed ledger is a database that is decentralised, accessible to everyone and based on consensus. Since January 2018 a new regulation is in place, requiring authorisation by the Gibraltar Financial Services Commission for any firm carrying out by way of business, in or from Gibraltar, the use of DLT for storing or transmitting value belonging to others (also labelled as “DLT providers”). Activities of DLT providers come within the Financial Services Act, and persons conducting such controlled activities are obliged entities under the Proceeds of Crime Act. DLT providers are recognised as financial institutions under the AML/CFT Law, which subjects them to CDD, transaction monitoring, record keeping, reporting and training requirements.
64. Mr Parody stressed that the “know your customer”-requirements for DLT providers are more extensive than for a regular financial institution. A DLT provider is required to provide extra information on the client, including its identity, the technicalities of its computer and recent block-chain transactions made, in addition to the regular CDD information. With such enhanced reporting requirements, Gibraltar aims to break the anonymity of DLT, as the information enables the traceability of each customer. A DLT provider should have systems in place to detect incongruity between information known about or provided by customers, and information gathered during a transaction. Incongruities and anomalies should be flagged, investigated and subjected to risk assessment for financial crime purposes. Mr Parody stressed the importance of international co-operation and domestic action taken in the field of DLT regulation, to successfully tackle ML/TF through virtual currencies.

Day 3: Thursday 5 July 2018

Agenda items 15 and 16 – Discussion on the draft 5th round Mutual Evaluation Report on Albania

65. The Chair introduced the draft Mutual Evaluation Report (MER) on Albania. He thanked the delegations for submitting written comments on the MER which served as a basis for selecting the key issues that were discussed at the Working Group on Evaluations. The Secretariat introduced the evaluation team and provided an overview of the key findings and priority recommended actions. Albania’s head of delegation outlined some of the changes introduced in the country since the last evaluation and introduced the Albanian delegation. The Co-Chairs of the Working Group on Evaluations presented the discussion and decisions taken by the Working Group on Evaluations on each key issue. They also provided an overview of the key issues which no longer needed to be

discussed by the Plenary was also provided.

66. *Key issue 1 (Immediate Outcome 1)*: Albania presented arguments in support of a request for an upgrade of IO.1 from a “moderate” to a “substantial” rating. The evaluation team explained its position and decision for a “moderate” rating. A majority of delegations supported Albania’s request for an upgrade, based on the numerous positive findings under IO.1 and the additional information by the authorities. Some of these delegations expressed themselves on the identified deficiencies in relation to assessment and mitigation of risks arising from the informal economy. Other delegations supported the current rating and expressed their concerns on the limited TF risk assessment. There was eventually no consensus to change the rating which thus remained as “moderate”.
67. *Key issue 2 (Immediate Outcome 7)*: The Co-Chair informed the Plenary about the changes to the second recommended action under IO.7 proposed, which was accepted by all delegations. One delegation raised a horizontal issue with regard to the assessment of the impact of corruption on the number of ML investigations and convictions under IO.7. The evaluation team, while acknowledging that corruption is a serious threat/vulnerability in the country, clarified that this had been taken into consideration; however, there was no factual basis to draw conclusions as to the effect of corruption on the low number of ML investigations and convictions. The FATF proposed to add a new recommended action on reviewing whether and what positive impacts the on-going judicial reform would have on the number of ML indictments. Considering that no delegation challenged the rating of IO.7, the Plenary decided that the “moderate” rating should remain.
68. *Key issue 3 (Immediate Outcome 8)*: The Co-Chair explained that, during the working group meeting, Albania had called for an upgrade to “moderate” for IO.8, which had been supported by the majority of delegations. In light of this, the evaluation team had reconsidered the key findings for this IO as well as the underlying analysis, and agreed that the rating for IO.8 could be upgraded to “moderate”. The delegations unanimously supported this proposal; hence the rating for IO.8 was upgraded to “moderate”.
69. *Key issue 4 (Immediate Outcome 9)*: Albania presented arguments in support of a request for an upgrade from a “low” to a “moderate” rating for IO.9. In particular, the country argued that the lack of TF prosecutions and convictions would not *per se* justify the “low” rating and provided reasons for the absence of TF prosecutions in the two major terrorism-related cases. The evaluation team clarified that Albania seemed to have properly understood and mitigated terrorism-related threats and had successfully prosecuted terrorism-related cases. However, it considered that there had also been room for investigating the financial background of these terrorism-related activities. This had however not taken place. In the absence of further support for an upgrade, the rating for IO.9 remained unchanged.
70. *Key issue 5 (Immediate Outcome 5)*: The Co-Chair informed the Plenary about the changes proposed by the evaluation team following the Working Group on Evaluations. Reflecting on the proposed amendments, one delegation and one scientific expert suggested additional revisions of the text concerning: bearer-shares, to qualify how the findings were made; supplementing the recommended action to reflect on further need to explore the issue on nominee arrangements in the country; and to consider the revision of the rating for criterion 24.11 in the light of the proposed amendments of the wording. No delegation suggested to down-grade the rating for IO.5. The evaluation team agreed with the proposals, and introduced respective amendments to the text, suggesting an upgrade for criterion 24.11 (to the level up to “mostly met”) without amending the overall rating for R.24. The Plenary approved the amendments to the MER and the revision of the rating for criterion 24.11, while the rating for IO.5 remained unchanged.

71. *Key issue 6 (Immediate Outcome 4)*: Delegations approved minor changes to the report proposed by the evaluation team following the Working Group on Evaluations. The evaluation team also responded to a query by the scientific experts on the materiality of the foreign exchange sector. The evaluation team presented its main reasons for the rating. During the subsequent discussion, several delegations expressed concerns about the consistency of the "substantial" rating with other MERs. On the other hand, a number of delegations expressed support for the evaluation team's position. Summarising the situation, the Chair concluded that there had been no consensus to change the rating, but that the comments by the dissenting delegations would suggest the possibility that this rating could be challenged after adoption for its consistency with other MERs in line with Rule 19b) of the 5th round Rules of Procedures. Therefore, he proposed to the Plenary two options: 1. to decide whether to adopt the report as it is; or 2. to request the evaluation team to make further changes to IO.4 to be presented in December to seek to find a consensus in light of a further revised version. As the majority of delegations expressed support for the first option, the rating for IO.4 remained unchanged.
72. *Additional issues raised at the Plenary*: Albania requested an upgrade of IO.2 to "substantial" by disagreeing with the evaluation team that there was a remarkably high level of prosecutorial reliance on MLA in obtaining evidence on the criminal origin of proceeds which hinders the investigation and prosecution of ML cases and thus had a considerable impact on the rating of the IO.2. The evaluation team explained that careful consideration had been given to all positive achievements of Albania when forming the overall conclusion about the effectiveness of providing and requesting international cooperation in criminal cases as well as the respective deficiencies and the rating was thus well balanced. In the absence of sufficient support for an upgrade, the rating for IO.2 remained unchanged. Albania also raised a concern with respect to the overall rating of R.6, in the light of the outcomes of the follow-up process under the previous round. The evaluation team clarified its position on the rating which remained unchanged.

Decision taken

73. The Plenary adopted the 5th round MER of Albania and its executive summary, including the amendments agreed upon during the discussion and subject to further editorial changes. According to Rule 23 of MONEYVAL's 5th round Rules of Procedure, Albania was placed in enhanced follow-up and requested to report back at the last Plenary in 2019. The report will be final and published after the "quality and consistency review" of the global AML/CFT network.

Agenda item 17- Fifth round follow-up: first regular follow-up report by Armenia

74. Following the decision in December 2015 by the Plenary, Armenia was subjected to the 5th round regular follow-up process and invited to report back at the first Plenary in 2018. Armenia had previously submitted an interim progress report in December 2016 on a selected issue with regard to R.7. A summary report and an analytical tool were prepared by the Secretariat with contributions from Rapporteur Teams from Liechtenstein and the Slovak Republic. The documents also included an assessment of compliance with those Recommendations for which the Methodology has changed since the adoption of the MER in 2015: R.5, R.7, R.8, R.18 and R.21.
75. The Plenary found that Armenia had made good progress in addressing the technical compliance deficiencies identified in MONEYVAL's mutual evaluation report of December 2015. This led the Plenary to take the decision to grant Armenia's request for upgrades for R.1 and R.7 to "largely compliant". With regard to R.7, the Plenary noted the fact that amendments to the AML/CFT Law meanwhile expressly referred also to targeted financial sanctions with regard to proliferation (the absence of which led the evaluation

team in 2015 to rate R.7 as “partially compliant”, as any measure undertaken on this basis could be open to legal challenge). The Plenary discussed the fact that some provisions in that law did still not expressly make reference to proliferation, but considered that this was overall not a major deficiency.

76. In the course of evaluating Armenia against the amendments made to the FATF standards and methodology since the adoption of its MER, the Plenary also decided to re-rate Recommendation 8 as “compliant”. The Plenary discussed whether cooperation with the NPO sector under criterion 8.2.c was sufficient to justify such a rating, and confirmed this after additional information had been provided by the Armenian delegation which was subsequently integrated into the Secretariat analysis.
77. The Plenary also recognised that further steps had been taken to improve compliance with R.12, 28 and 31, but that shortcomings (which are more than just minor ones) remain. In this regard, the Secretariat recalled the general expectation for countries to have addressed most if not all of the technical compliance deficiencies by the end of the third year after the adoption of the mutual evaluation report (Rule 21.8 of MONEYVAL’s 5th round rules of procedure).

Decision taken

78. The Plenary adopted the summary report, decided that Armenia remains in regular follow-up and invited the country to report back to MONEYVAL in two-and-a-half years. Delegations were reminded that the follow-up report of Armenia would be submitted to the “quality and consistency review” of the global AML/CFT network (Rule 21.15 of MONEYVAL’s 5th round rules of procedure), and that any re-ratings decided upon by the Plenary are consequently not final before the finalisation of this review.

Agenda item 18 - Fifth round follow-up: first regular follow-up report by the UK Crown Dependency of the Isle of Man

79. The Isle of Man submitted its first follow-up report under the enhanced follow-up process along with a request for re-ratings in relation to R.6, R.16, R.23, R.24, R.25, R.29, R.32, R.33, R.35 and R.40. A summary report and an analytical tool were prepared by the Secretariat with contributions from Rapporteur Teams from Estonia and Poland. The documents also included an assessment of compliance with those Recommendations for which the Methodology has changed since the adoption of the MER: R.5, R.7, R.8, R.18 and R.21.
80. The draft documents submitted for comments proposed the following: re-ratings from “partially compliant” to “largely compliant” for R.16, R.24 and R.35; and from “largely compliant” to “compliant” for R.5, R.6, R.29, R.32 and R.33. Ratings would remain unchanged as “partially compliant” for R.23 and R.25 and as “largely compliant” for R.7, R.8, R.18, R.21 and R.40. Based on comments received from two delegations, a list of main issues for discussion in Plenary was prepared. The issue for discussion 1 related to R.24.
81. The Plenary was invited to consider whether, as proposed in the draft summary report, sufficient progress had been made by the Isle of Man to be re-rated as “largely compliant”, as well as to discuss a number of findings in relation to specific criteria of the Recommendation. In relation to c.24.5, it was decided that sufficient clarity had been provided by the Isle of Man on conditions for changes in a partner of a partnership to become legally binding and how those changes are reported to the partnership. With respect to c.24.7, the Plenary concluded that the revised obligation for legal owners to notify changes in beneficial ownership to the nominated officer of the legal person is in

line with the standard. The Plenary agreed that information would be provided in the summary report on sanctions associated with breaches of that obligation. In relation to c.24.9, however, the Plenary noted that the revised record-keeping requirement on beneficial ownership information was not fully in line with the standard. Overall, in light of the progress reported, especially in relation to the most significant gaps noted in the MER, as well as the nature of the remaining deficiencies, the Plenary approved the re-rating of R.24 from “partially compliant” to “largely compliant”.

82. Issue 2 for discussion related to R.16. The Isle of Man reported having introduced the provisions of EU Regulation 2015/847 in its legislation. On that basis, the draft summary report proposed that the Isle of Man be re-rated from “partially compliant” to “largely compliant”. It was considered that the absence of a specific requirement for MVTs provider to file an STR *in any country affected* by the suspicious wire transfer, and make relevant transaction information available to the Financial Intelligence Unit, was not in line with c.16.17.b. However, noting that countries with similar legislation were rated as “compliant” with R.16 in recent follow-up reports (e.g. Austria), the Plenary decided that, to ensure consistency, the Isle of Man could be considered to be compliant with c.16.17b. The Isle of Man was re-rated as “compliant” with R.16.

Decision taken

83. The Plenary adopted the summary report, with amendments relating to the rating for R.16 and some specific findings under R.24 (clarification on sanctions available for failure to notify changes in beneficial ownership to nominated officers; limitations in relation to the obligation to record beneficial ownership information). Delegations were reminded that the follow-up report of the Isle of Man would be submitted to the “quality and consistency review” of the global AML/CFT network (Rule 21.15 of MONEYVAL’s 5th round rules of procedure), and that any re-ratings decided upon by the Plenary are consequently not final before the finalisation of this review.

Agenda item 19 – Presentation of a Secretariat paper on a regional operational plan to counter terrorist financing

84. The Secretariat recalled that in February 2016, the FATF adopted and published a Consolidated Strategy on Combatting Terrorist Financing (“CFT Strategy”). In November 2017, most of the items in the plan had been completed. It was therefore agreed by FATF to adopt a new Operational Plan in February 2018 to continue implementing the CFT Strategy. The Secretariat noted that, among other matters, the 2018 Operational Plan emphasises the need for the FATF to work more closely with FATF-style regional bodies (FSRBs) to strengthen existing work-streams on TF (e.g. ISIL and Al Qaida updates) and calls upon FSRBs to develop their own regional plans and actions on CFT with the assistance of the FATF. In pursuance of this objective, the MONEYVAL Secretariat presented various proposals which could be included in a MONEYVAL CFT Operational Plan. The proposals put forward involve TF risk-related activities; training intended for law enforcement authorities, prosecutors and judges on various aspects of the TF offence; training on targeted financial sanctions; the inclusion of a standing agenda item at MONEYVAL Plenaries as a platform to share best practices; challenges in the implementation of TF Standards etc.; and closer collaboration with the Economic Crime and Co-operation Division of the Council of Europe to identify those areas of TF which require special attention as a basis for technical assistance projects. It was noted that all proposals would be taken forward depending on the availability of budgetary resources.
85. The paper presented by the Secretariat received broad support by the Plenary. Additional recommendations were made by various delegations. For instance, it was suggested that initiatives undertaken under MONEYVAL’s regional CFT Operational Plan could involve

neighbouring countries from FATF and the Eurasian Group (EAG) which shared similar TF risks. As for training, the FATF informed the Plenary that FATF Training and Research Institute (TREIN) was in the process of developing a new module on CFT, which was expected to be rolled out in January 2019. This could be used to complement training activities under MONEYVAL's CFT Operational Plan.

Decision taken

86. The Plenary adopted the Secretariat's paper with all the proposals contained therein and deputed the Secretariat to develop a more detailed action plan, including timelines and the resources necessary, and present it at MONEYVAL's 57th Plenary in December 2018.

Agenda item 20 – Guidance on Identifying, Assessing and Understanding the Risk of Terrorist Financing in Financial Centres – presentation by Mr Richard Walker, UK Crown Dependency of Guernsey

87. The Plenary heard a presentation from Mr Richard Walker on a recently developed guidance-paper on TF threats and vulnerabilities in international financial centres (IFCs), which had been developed by a number of representatives from IFCs from Europe and elsewhere at a two-day workshop in Monaco in February 2018. The guidance has been prepared on the basis that the primary TF risk for most FICs is likely to arise from their use as transit jurisdictions for the movement of funds linked to terrorist activity outside the jurisdiction, or from their involvement in the management of foreign funds or businesses that are linked to such activity.

88. The guidance-paper mentions two aspects for the assessment of the TF threat of an IFC. The first is to look at connections between the IFC and a target jurisdiction, including the extent to which the IFC's businesses or NPOs may be involved in the international movement of goods that could be used for terrorism or to finance terrorist activities. The second is to consider the extent to which terrorism or TF is occurring in jurisdictions with which the IFC has close geographical and/or political links. The assessment of vulnerability also contains two aspects: an examination of the extent to which the services or products offered by IFCs are likely to be attractive for TF purposes; and the extent to which the IFC has adequate measures in place to address TF. Mr Walker, in response to a query, further stipulated that jurisdictions should take into account all sanctions, including trade and economic-based sanctions directed at certain jurisdictions. The MONEYVAL Plenary welcomed and endorsed the document, although it is still subject to certain changes and comments to be put before its publication and circulation.

Agenda item 21 - The new 5th AML/CFT Directive by the European Union: presentation by Mr David Schwander, EU Commission

89. The Plenary heard a presentation by Mr David Schwander, European Commission, on the 5th AML/CFT Directive by the European Union. In May 2015, the 4th AML/CFT Directive was adopted in order to align the EU regime with the revised FATF standards. Nevertheless, the terrorist attacks of the last years and the revelations of Panama Papers highlighted the need to further reinforce the fight against terrorist financing and to require further transparency with regard to beneficial ownership. In response to these emerging threats, the need for a revision of the AML/CFT Directive was felt with urgency within the EU. The 5th AML/CFT Directive has been adopted and entered into force on 9 July 2018. Member States will have to implement these new rules into their national legislation by January 2020.

90. The 5th AML/CFT Directive represents the first upgrading of the EU regime independently from the revision of the FATF standards. The main modifications of the Directive consist

in: improving transparency on the real owners of companies, by making the beneficial ownership registers for legal entities public; improving the transparency on the real owners of trusts, by giving access to relevant data to competent authorities, FIUs, obliged entities and other persons with a legitimate interest; extending the AML/CFT rules to virtual currencies; enlargement of the list of sectors covered as obliged entities (e.g. letting agents with a monthly rent superior to EUR 10,000 and traders of work of art); several measures to tackle the anonymity of transactions via electronic money products (e.g. the identification of the users of prepaid cards for all transactions exceeding EUR 150 when directly used at the point of sale and EUR 50 when the prepaid instrument is used on-line); and broadening the criteria for assessing high-risk third countries that will be supervised more efficiently. Moreover, the EU decided to enhance the powers of FIUs, widening the scope of the accessible information and granting the exchange of information between FIUs independently from the existence of a predicate offence. Centralised bank and payment accounts registers (or retrieval systems) will be introduced at the level of Member States and will collect information on bank and payment accounts and safe deposit boxes. The registers will be accessible to FIUs and competent AML/CFT authorities.

Day 4: Friday 6 July 2018

Due to the absence of the Chair who acted as Co-Chair for the meeting of the FATF's Joint Group for Europe and Eurasia which was held in parallel, the Plenary was chaired on 6 July 2018 by the two Vice-Chairs who alternated between agenda items.

Agenda items 22 and 23 - Information on AML/CFT initiatives from international organisations

91. The Plenary heard information about recent initiatives from the European Commission, the Eurasian Group on Combating Money Laundering and Terrorist Financing (EAG), the Financial Action Task Force (FATF), the International Monetary Fund (IMF) and the World Bank. The presentation of the United Nations Office on Drugs and Crime (UNODC), a delegate of which had been present during the meeting but was unable to attend this particular agenda item, is available in writing on MONEYVAL's restricted website.

Agenda item 24: Case presentation of a prosecution and conviction of financing of terrorism: presentation by Ms Laura Vaik, State Prosecutor, Estonia

92. The Plenary heard a presentation by Ms Laura Vaik, State Prosecutor from Estonia, which dealt with a conviction for TF in Estonia, as confirmed by the Estonian Supreme Court. The presentation was given from the perspective of the Prosecutor who had prepared and followed the case until it became final. The case dealt with two persons who had been convicted for TF for having financially supported a third person in order to travel to Syria to join the 'jihad'. The Estonian courts eventually convicted the two accused persons for TF and sentenced them to two and three years' imprisonment, respectively.

93. In her presentation, the Estonian Prosecutor focused in particular on the evidence needed to secure a TF conviction (e.g. proving the traveling and the terrorist activities of the third person, as well as proving the actual financial support by the accused). The Prosecutor's Office was challenged as to the submission of evidence of information collected on the basis of the Estonian Security Authorities Act. It also used information collected on the basis of e-mail communications, wire-tapping, house searches, bank

transaction information and the statements of the accused. The power point presentation underlying this agenda item can be obtained from the restricted website.

Agenda item 25 – The role of the FIU in the investigation of corruption”: presentation by Mr Vitalii Berehivskyi

94. The Plenary heard a presentation by Mr Vitalii Berehivskyi which dealt with the Ukrainian experience in the field of corruption and the role of the FIU in tackling this phenomenon. Corruption is a sensitive topic in Ukraine and it represents a dangerous social phenomenon. In the fight against corruption, the Ukrainian FIU provides a fundamental input and uses several instruments for financial analysis: the direct access to various registries, the possibility to ask for additional information and to exchange information with the FIU of foreign countries, as well as the chance to track and – where necessary – suspend financial transactions. The main source of information for the FIU is the “Public Register of Domestic Politically Exposed Persons of Ukraine” (PEPs Registry), which had been subject of a separate presentation to the 55th MONEYVAL Plenary in December 2017 (see the meeting report of that Plenary for more information). The presentation also included three successful domestic case examples concerning corruption that were solved with the support and the collaboration of the Ukrainian FIU with other authorities (e.g. the National Anti-Corruption Bureau).

Agenda item 26 – Voluntary Tax Compliance Scheme of San Marino

95. The Plenary considered the Secretariat analysis of the voluntary tax compliance (VTC) programme adopted by San Marino in February 2018 (Delegated Decree No. 15). On the basis of the material provided by San Marino prior to the Plenary which had been analysed by the Secretariat, and in light of further clarifications made by the country during the discussion, the Plenary concluded that the VTC programme was compatible with the four basic principles of the FATF for VTC programmes and did not appear to have any negative impact on the implementation of AML/CFT measures in San Marino. Therefore, the Plenary decided to adopt the Secretariat analysis and concluded that no further action was needed with regard to San Marino’s VTC programme.

Agenda item 27 – Report from the Gender Rapporteur

96. Ms Maja Cvetkovski (Slovenia), Gender Equality Rapporteur of MONEYVAL, provided an update on the gender equality perspective with regard to trafficking in human beings (THB), which remains an important predicate offence for money laundering in a number of MONEYVAL jurisdictions. Having touched upon this topic already from the side of “women as victims”, she this time brought up the topic of “women as perpetrators”. Women can play a role as traffickers of human beings, which is generally under-acknowledged. Reports by the UN and Europol support this statement. In one such study among 42 countries, women made up a substantial proportion of traffickers, as the percentage of women convicted ranged from 10 to 50%. From another report published in 2009, it appears that women made up a larger share of those convicted for THB offences in Europe than for most other forms of crime. The role of women is therefore extremely important to acknowledge and understand to uncover the financial flows and money laundering derived from THB.

97. Ms Cvetkovski proposed to continue following the subject of “Women as perpetrators of THB and the related financial flows”, as it was considered that the percentage of women as perpetrators – and not victims – should not be neglected. She stated her intention to contact her fellow Gender Equality Rapporteurs in other committees within the Council of Europe to take part in a “mapping research”, with key findings are planned to be presented at the 58th MONEYVAL Plenary in 2019.

98. The Executive Secretary stressed the importance to keep THB and gender on MONEYVAL's agenda. In this regard, he pointed to the recently-adopted typologies report by the FATF on financial flows and THB. Moreover, he informed the Plenary about a project conjointly initiated by Liechtenstein and the United Nations University Centre for Policy Research, which aims to put the financial sector at the heart of global efforts to end modern slavery and THB. The project will set up a time-bound global Financial Sector Commission on Modern Slavery and Human Trafficking, comprised of leaders and experts in the field (ranging from banks, international financial institutions, global standard setters, hedge funds and regulators, to civil society, law enforcement and the UN). The Commission will discuss the sector's role in tackling these crimes by considering, amongst others, how efforts to end modern slavery and THB connect to questions of lending and investment, compliance, sustainability and innovation. The Commission will meet four times from September 2018 until July 2019 for consultations with global experts to develop a strategic action plan for the financial sector.

Agenda item 28 - Appointment of the Rapporteur Teams for the follow-up report to be considered at the 57th Plenary (Rule 21, paragraph 6 of MONEYVAL's 5th round Rules of Procedure)

99. The Plenary appointed the following states/jurisdictions as rapporteur teams for the 5th round follow-up reports which are scheduled for consideration at MONEYVAL's 57th Plenary in December 2018: France and Romania (for the follow-up report of Andorra); Armenia and the UK Crown Dependency of Jersey (for the follow-up report of Hungary); Bulgaria and Latvia (for the follow-up report of Serbia); as well as Croatia and Georgia (for the follow-up report of Slovenia). After the Plenary, the Secretariat will contact the Rapporteur teams to explain the further progress and the division of work. The Secretariat thanked Estonia and Poland for having acted as rapporteur teams for the follow-up report of Armenia, as well as Liechtenstein and the Slovak Republic for having acted as rapporteur teams for the follow-up report of the UK Crown Dependency of the Isle of Man at the present Plenary.

Agenda item 29 - Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS No. 198)

100. The Executive Secretary reported about recent developments concerning the Conference of the Parties to Convention CETS. 198. On 12 February 2018, Denmark ratified the Convention, with its entry into force on 1 June 2018. Although ratifications by Greece and the Russian Federation had already been announced during the December 2017 Plenary meeting, the entry into force of the Convention for these states took place only recently - on 1 January and 1 March 2018 respectively. The 10th Plenary of the Conference of the Parties is scheduled for 30-31 October 2018 (dates to be confirmed).

Agenda item 30 – Miscellaneous

101. MONEYVAL will hold its 57th Plenary from 3-7 December 2018.

ANNEX I – Agenda of the Plenary

Day 1: Tuesday 3 July 2018 / 1er jour: mardi 3 juillet 2018

Morning 9.30 a.m. / matin 9h30

1. **Opening of the Plenary Meeting at 9.30 a.m. / Ouverture de la réunion plénière à 9h30**
 - 1.1 **Statement by Mr Jan Kleijssen, Director, Directorate Information Society and Action against Crime / Allocution de M. Jan Kleijssen, Directeur de la Direction de la société de l'information et de la lutte contre la criminalité**
2. **Adoption of the Agenda / Adoption de l'ordre du jour**
3. **Information from the Chairman / Informations communiquées par le Président**
 - 3.1 **Chairman's correspondence / Correspondance du Président**
 - 3.2 **Update on the Roundtables on Correspondent Banking and discussion on private sector outreach / Point sur les tables rondes organisées en matière de correspondance bancaire et discussion sur les actions à mener pour toucher le secteur privé**
 - 3.3 **Other issues / Autres sujets**
4. **Information from the Secretariat / Informations communiquées par le Secrétariat**
 - 4.1 **MONEYVAL calendar of activities 2018 / Calendrier des activités en 2018**
 - 4.2 **Report from the Secretariat on the June FATF meeting / Rapport du Secrétariat sur la réunion de juin du GAFI**
 - 4.3 **Reports on Secretariat attendance in other fora / Rapports du Secrétariat sur sa participation aux réunions d'autres institutions**
 - 4.4 **Financing and staffing / Financement et questions de personnel**
 - 4.5 **Other issues / Autres sujets**
5. **Compliance Enhancing Procedures / Procédures de conformité renforcée**
 - 5.1 **Report from Bulgaria under step I of the Compliance Enhancing Procedures / Rapport de la Bulgarie au titre de l'étape (i) des Procédures de conformité renforcée**
 - 5.2 **Report from Croatia under step I of the Compliance Enhancing Procedures / Rapport de la Croatie au titre de l'étape (i) des Procédures de conformité renforcée**
 - 5.3 **Report from Poland under step I of the Compliance Enhancing Procedures / Rapport de la Pologne au titre de l'étape (i) des Procédures de conformité renforcée**
 - 5.4 **Report from the Slovak Republic under step I of the Compliance Enhancing Procedures / Rapport de la République slovaque au titre de l'étape (i) des Procédures de conformité renforcée**
 - 5.5 **Report from Montenegro under step II of the Compliance Enhancing Procedures / Rapport du Monténégro au titre de l'étape (ii) des Procédures de conformité**

renforcée

Afternoon 2.30 p.m. / après-midi 14h30

6. « **Practical recommendations on how to prepare a country assessment – lessons learnt from the first nine MONEYVAL mutual evaluations in the fifth round** » / *Recommandations pratiques sur la manière de bien préparer une évaluation – leçons retenues après les neuf premières évaluations mutuelles MONEYVAL du cinquième cycle*
7. **Information on AML/CFT initiatives in MONEYVAL States and territories (tour de table)** / *Informations sur les initiatives LAB/FT des Etats et territoires de MONEYVAL (tour de table)*

Day 2: Wednesday 4 July 2018 / 2ème jour: mercredi 4 juillet 2018

Morning 9.30 a.m. / matin 9h30

8. **Discussion on the draft 5th round Mutual Evaluation Report on Latvia** / *Discussion du projet de rapport d'évaluation mutuelle du 5^e cycle de la Lettonie*

Afternoon 2.30 p.m. / après-midi 14h30

9. **Continuation of the discussion on the draft 5th round Mutual Evaluation Report on Latvia** / *Suite de la discussion du projet de rapport d'évaluation mutuelle du 5^e cycle de la Lettonie*
10. **Fourth round follow-up: application by “The former Yugoslav Republic of Macedonia” to be removed from regular follow-up** / *Suivi au titre du quatrième cycle: demande de l'«ex-République yougoslave de Macédoine» de sortir de la procédure de suivi régulier*
11. **Fourth round follow-up: application by Liechtenstein to be removed from regular follow-up** / *Suivi au titre du quatrième cycle: demande du Liechtenstein de sortir de la procédure de suivi régulier*
12. **Fourth round follow-up: application by Romania to be removed from regular follow-up** / *Suivi au titre du quatrième cycle: demande de la Roumanie de sortir de la procédure de suivi régulier*
13. **Recent changes to the FATF methodology for R.18/21 (information sharing): Presentation by the FATF Secretariat** / *Changements récents apportés à la méthodologie du GAFI concernant les recommandations R.18/21 (partage d'information): présentation du Secrétariat du GAFI*
14. **Breaking the anonymity of virtual currencies”: presentation by Mr David Parody, British Overseas Territory of Gibraltar** / *“Briser l'anonymat des monnaies virtuelles” : présentation par M. David Parody, Territoire britannique d'outre-mer Gibraltar*

Day 3: Thursday 5 July 2018 / 3ème jour: jeudi 5 juillet 2018

Morning 9.30 a.m. / matin 9h30

15. **Discussion on the draft 5th round Mutual Evaluation Report on Albania** / *Discussion du projet de rapport d'évaluation mutuelle du 5^e cycle de l'Albanie*

Afternoon 2.30 p.m. / après-midi 14h30

16. **Continuation of the discussion on the draft 5th round Mutual Evaluation Report on Albania / Suite de la discussion du projet de rapport d'évaluation mutuelle du 5^e cycle de l'Albanie**
17. **Fifth round follow-up: first regular follow-up report by Armenia / Suivi au titre du cinquième cycle : premier rapport de suivi renforcé de l'Arménie**
18. **Fifth round follow-up: first enhanced follow-up report by the UK Crown Dependency of the Isle of Man / Suivi au titre du cinquième cycle : premier rapport de suivi renforcé de la dépendance de la Couronne du Royaume-uni Ile de Man**
19. **Presentation of a Secretariat paper on a regional operational plan to counter terrorist financing / Présentation d'un document du Secrétariat sur un plan opérationnel régional de lutte contre le financement du terrorisme**
20. **"Guidance on Identifying, Assessing and Understanding the Risk of Terrorist Financing in Financial Centres": presentation by Mr Richard Walker, UK Crown Dependency of Guernsey / Conseils pour identifier, évaluer et comprendre le risque engendré par le financement du terrorisme dans les centres financiers : présentation de M. Richard Walker, Dépendance de la couronne britannique Guernsey**
21. **"The new 5th AML/CFT Directive by the European Union": presentation by Mr David Schwander, EU Commission / La nouvelle Directive de l'Union européenne en matière de LAB/CFT : présentation de M. David Schwander, Commission européenne**
22. **Information from the European Commission / Information de la Commission européenne**

Day 4: Friday 6 July 2018 / 4^{ème} jour: vendredi 6 juillet 2018

23. **Information on AML/CFT initiatives in other fora / Informations sur les initiatives LAB/FT d'autres institutions**
 - 22.1 **EBRD / BERD**
 - 22.2 **Egmont Group / Groupe Egmont**
 - 22.3 **Eurasian Group on Combating Money Laundering and Terrorist Financing (EAG) / Groupe Eurasie sur le blanchiment d'argent et le financement du terrorisme (EAG)**
 - 22.4 **FATF / GAFI**
 - 22.5 **GIFCS / GSCFI**
 - 22.6 **IMF / FMI**
 - 22.7 **UNODC / ONUDC**
 - 22.8 **World Bank / Banque Mondiale**
24. **"Case presentation of a prosecution and conviction of financing of terrorism": presentation by Ms Laura Vaik, State Prosecutor, Estonia /**
25. **"The role of the FIU in the investigation of corruption": presentation by Mr Vitalii Berehivskyi, Ukraine / « Rôle de la CRF dans les enquêtes de corruption » : présentation par M. Vitalii Berehivskyi, Ukraine**
26. **Voluntary Tax Compliance Scheme of San Marino / Système de régularisation fiscale volontaire de Saint-Marin**
27. **Report from the Gender Rapporteur / Rapport du Rapporteur sur l'égalité des genres**

28. Appointment of the Rapporteur Teams for the follow-up reports to be considered at the 57th Plenary (Rule 21, paragraph 6 of MONEYVAL's 5th round Rules of Procedure) / *Nomination des équipes de rapporteurs pour les rapports de suivi qui seront examinés lors de la 57^{ème} session plénière (Règle 21, paragraphe 6 des Règles de procédure du 5^{ème} cycle de MONEYVAL)*

29. Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS No. 198) / *Convention du Conseil de l'Europe relative au blanchiment, au dépistage, à la saisie et à la confiscation des produits du crime et au financement du terrorisme (STCE No. 198)*

30. Miscellaneous / Divers

ANNEX II – MONEYVAL Calendar of activities 2018-2019 (first half)

	2018	
18-23 February	FATF Plenary, Paris	
5-16 March	5th round onsite visit to the Czech Republic	
5-22 March	Joint FATF/MONEYVAL onsite visit to Israel	
26-27 March	Joint FATF/MONEYVAL/OSCE AML/CFT workshop for judges and prosecutors, Strasbourg	
13-14 April	Training UK Overseas Territory of Gibraltar	
23-27 April	5th round MONEYVAL evaluators training (Lanarca, Cyprus)	

7-19 May	5th round onsite visit to Lithuania	
4-5 June	Country Training Cyprus	
24-29 June	FATF Plenary, Paris	
2 July	Working Group on Evaluations	5th round MER: <i>Latvia</i> (morning), <i>Albania</i> (afternoon)
3-6 July	PLEN 56	5th round follow-up: <i>Armenia</i> and <i>Isle of Man</i>
24-28 September	Joint FATF/MONEYVAL/EAG 5th evaluators training (Moscow, Russian Federation)	
24-25 October	Country Training Slovak Republic	
1-12 October	5th round onsite visit to the Republic of Moldova	
14-19 October	FATF Plenary, Paris	
30-31 October	COP Plenary	
5-16 November	5th round onsite visit to Malta	

November (tbc)	Country Training Georgia	
3 December	Working Group on Evaluations	5th round MER: <i>Czech Republic</i> (morning) <i>Lithuania</i> (afternoon)
4-7 December	PLEN 57	5th round follow-up: <i>Andorra, Hungary, Slovenia, Serbia</i>
2019 (first half)		
January (tbc)	Country Training San Marino	
17-22 February	FATF Plenary, Paris	
February (tbc)	Country Training Holy See	
11-29 March	Joint FATF/EAG/MONEYVAL onsite visit to the Russian Federation	
1-12 April	5th round onsite visit to UK Overseas Territory of Gibraltar	
tbc	Working Group on Evaluations	5th round MER: <i>Republic of Moldova</i> (morning) <i>Malta</i> (afternoon)
tbc	PLEN 58	5th round follow-up: <i>Ukraine, Isle of Man</i> (tbc)

13-24 May	5 th round onsite visit to Cyprus	
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ANNEX III

DRAFT LIST OF PARTICIPANTS / PROJET DE LISTE DES PARTICIPANTS

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AND ON THE FINANCING OF TERRORISM (CETS NO. 198) /
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