

## PROPOSAL

Pursuant to Article 43, paragraph 3, of the Law on Government ('RS Official Gazette', No. 55/05, 71/05-corrigendum, 101/07 and 65/08), in relation to the National Strategy against Money Laundering and the Financing of Terrorism ('RS Official Gazette', No. 89/08),

The Government hereby adopts

### CONCLUSION

1. The Action Plan for the Implementation of the National Strategy against Money Laundering and the Financing of Terrorism (AML/CFT Strategy), which is an integral part of this Conclusion, is adopted;
2. For the purpose of implementation, this Conclusion shall be sent to the Ministry of Finance, which will send a copy each to the Foreign Exchange Inspectorate (FEI), Tax Administration (TA), Customs Administration (CA), Administration for the Prevention of Money Laundering (APML), and the Games of Chance Administration (GCA); Ministry of Interior; Security Information Agency; Ministry of Defence, which will send a copy each to the Military-Intelligence Agency and Military-Security Agency; Ministry of Justice, which will send a copy each to the Supreme Court of Serbia and to the Republic Public Prosecutor's Office; National Bank of Serbia; and Securities Commission.

05 Number:  
In Belgrade,

GOVERNMENT

VICE-PRESIDENT

# **ACTION PLAN FOR THE IMPLEMENTATION OF THE NATIONAL AML/CFT STRATEGY**

## **1. INTRODUCTION**

On 25 September 2008, the Government of the Republic of Serbia adopted the National AML/CFT Strategy ('RS Official Gazette', No 89/08 - hereinafter: AML/CFT Strategy).

The AML/CFT Strategy gives recommendations to improve the system of the Republic of Serbia against money laundering and terrorism financing (AML/CFT), on the legislative, institutional, and operational levels, as well as in the field of professional training.

The body responsible to monitor the implementation of the AML/CFT Strategy is the Standing Coordination Group (hereinafter: SCG) whose mandate is to monitor the implementation of the AML/CFT Strategy, monitoring, recommending, and coordination of AML/CFT activities.

The AML/CFT Strategy provides that an action plan should be adopted for the purposes of its implementation which will set out the duties of all competent bodies, timelines, and assess the resources required for its implementation. The Action Plan for the implementation of the AML/CFT Strategy lays down a series of specific measures and actions to be implemented in the set timeframe, whose common objective is to contribute to the improvement of efficiency of the entire AML/CFT system.

The Action Plan is a special form of the plan which concretizes, for each of the competent bodies, the objectives and measures laid down in the AML/CFT Strategy.

## **2. ACTION PLAN DRAFTING METHODOLOGY**

The Action Plan is adopted for the period 2009-2013. This plan specifies certain priorities, objectives defined, timeframe for the implementation of the objectives, as well as the main implementing agencies, indicators and resources required for their implementation.

The Action Plan is in line with the content and objectives of the AML/CFT Strategy and serves as the main document for its implementation for the period of 5 years.

## **3. AML/CFT STRATEGY RECOMMENDATIONS FURTHER DEVELOPED IN THE ACTION PLAN**

The Action Plan ensures the responsibility of the main implementing agencies in the fixed areas of AML/CFT activity.

The Action Plan further develops the following AML/CFT Strategy Recommendations concerning the following levels:

- 1) Legislative;
- 2) Institutional;
- 3) Operational; and
- 4) Professional training.

For each type of recommendation, the Action Plan defines the objectives, activities for their implementation, main implementing agencies, timeframes, indicators, as well as resources required for the implementation of certain objectives.

## AML/CFT STRATEGY RECOMMENDATIONS

### 3.1. LEGISLATIVE LEVEL

<b>3.1.1. A new AML/CFT Law should be passed and harmonised with international standards</b>				
<b>Activities</b>	<b>Main Implementing Agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
Law on the Prevention of Money Laundering and Terrorism Financing (hereinafter: AML/CFT Law) with elements specified in the AML/CFT Strategy adopted	Administration for the Prevention of Money Laundering (hereinafter: APML)	Implemented	Published in 'RS Official Gazette', No. 20/09.  Adoption, every six months, of conclusions by SCG and previously established working groups, concerning the extant legislative framework and required amendments	

<p>Continually assess the extant legislative framework and its flexibility, initiate amending procedures of the existing legislation, as well as adopt new legislation to cover new and emerging money laundering and terrorism financing manifestations.</p> <p>Continual considerations of international recommendations, initiatives and standards in the area with the aim of amending the relevant legislation.</p> <p>Establish expert groups to assess the AML/CFT legislative situation.</p> <p>Participation of SCG members in working groups for the drafting of legislation in the area.</p>	<p>SCG in cooperation with APML, Police, Security Information Agency (hereinafter: SIA), Military Security Agency (hereinafter: MSA), Military Intelligence Agency (hereinafter MIA), bodies competent to monitor the implementation of AML/CFT Law, Tax Administration, Customs Administration, Foreign Exchange Administration.</p>	<p>Ongoing task</p>		
<p><b>3.1.2. The Law on Repressive Measures Implemented Based on Relevant UN SC Resolutions should be passed</b></p>				
<p><b>Activities</b></p>	<p><b>Main Implementing</b></p>	<p><b>Timeframe</b></p>	<p><b>Indicators</b></p>	<p><b>Resources required</b></p>

	<b>Agency</b>			
Develop a draft law on the application of international restrictive measures and put it into the procedure of adoption	Ministry of Foreign Affairs	First half of 2010	Publication in the 'RS Official Gazette'	
<b>3.1.3. The Criminal Code should be amended</b>				
<b>Activities</b>	<b>Main Implementing Agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
Implemented	Ministry of Justice		Published in the 'RS Official Gazette', number 72/09	
<b>3.1.4. The Criminal Procedure Code should be amended</b>				
<b>Activities</b>	<b>Main Implementing Agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
Implemented	Ministry of Justice		Published in the 'RS Official Gazette', number 72/09	
<b>3.1.5. Law on Seizure/Confiscation of Proceeds from Crime should be passed</b>				
<b>Activities</b>	<b>Main Implementing Agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
Implemented	Ministry of Justice		Published in the 'RS Official Gazette', number 97/08	
<b>3.1.6. Mutual legal aid legislation should be harmonised with the Warsaw Convention and International Convention on the Suppression of the Financing of Terrorism</b>				
<b>Activities</b>	<b>Main</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>

	<b>Implementing Agency</b>			
Ongoing	Ministry of Justice	End of 2009	Amendments of relevant laws and by-laws, publication in the 'RS Official Gazette'	
<b>3.1.7. Law on the Responsibility of Legal Person for Criminal Offences should be passed</b>				
<b>Activities</b>	<b>Main Implementing Agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
Implemented	Ministry of Justice		Published in the 'RS Official Gazette', number 97/08	
<b>3.1.8. Law on Payment Operations should be harmonised with the FATF Special Recommendation number 7 (electronic transfers) and EU Directive concerning the documentation that accompanies electronic transfers.</b>				
<b>Activities</b>	<b>Main Implementing Agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
Pass a new law on payment operations	Ministry of Finance and National Bank of Serbia (hereinafter: NBS)	3-4 years	Publication in the 'RS Official Gazette'	
<b>3.1.9. Law on ministries should be amended so as to include provisions on the competences of the ministries competent for finance in prevention and detection of the financing of terrorism</b>				

Activities	Main Implementing Agency	Timeframe	Indicators	Resources required
Incorporate the necessary provisions into the Law on Ministries by initiating its amending	Ministry of Finance and Ministry of Interior	End of 2010	Publication in 'RS Official Gazette'	
<b>3.1.10. Provide that judicial statistics should be maintained concerning seized and confiscated proceeds of crime, and concerning mutual legal assistance regarding AML/CFT criminal offences, for the purposes of harmonisation with FATF Recommendation 32.</b>				
Activities	Main Implementing Agency	Timeframe	Indicators	Resources required
- Establish the most appropriate system for a clear monitoring of data sent by district and municipal public prosecutor offices as their legal obligation, concerning the reported persons and ML/FT criminal offences, as well as actions taken in such cases and statistics concerning to seizure/confiscation of proceeds from crime and mutual legal assistance in the area	Republic Public Prosecutor's Office in cooperation with other competent State bodies	End of 2011	Statistics on reported persons and ML/FT criminal offences as well as actions taken, updated and available at the APML; provision of finances for the project implementation	Recommend that part of the project should be financed through foreign donations. The other part should be provided for in the Budget of the Republic of Serbia
- Develop a project design for the development of IT which will ensure maintainance of statistics in a comprehensive manner	SCG			
- Send a project proposal to foreign donors for financing	Ministry of Justice			
<b>3.1.11. The Law on Banks, Law on Capital Market, Law on Investment Funds, Law on Joint Stock Companies' Takeover, Law on Insurance, etc, should be reviewed ensuring that the powers of the bodies competent to monitor the implementation of these laws be applied also in the supervision of the implementation of the Law on the Prevention of Money Laundering and Terrorism Financing. These laws should govern the maintenance of statistics concerning the international cooperation of these bodies with their foreign counterpart institutions in the areas of money laundering and terrorism financing.</b>				
Activities	Main	Timeframe	Indicators	Resources required



	<b>Implementing Agency</b>			
Incorporate the necessary provisions into the Law on Banks	NBS	Beginning of 2011	Publication in the 'RS Official Gazette' of the amended laws on banks, financial leasing and insurance;	
Draft a new Law on Financial Leasing and Law Amending the Law on Insurance	NBS	End of 2010	authorising the Securities Commission to act according to the AML/CFT Law;	
The above listed laws enable the Security Commission to implement the powers and act according to the AML/CFT Law. Amend the above laws so as to harmonise them with the new AML/CFT Law	Securities Commission and Ministry of Finance's Fiscal System Department	End of 2010	international cooperation statistics maintenance system implemented and operational.	
<b>3.1.12. The situation in the area of the transfer of money or value should be analyzed in order to establish whether there are any informal money or value transfer mechanisms. This analysis should cover both formal and potential informal money or value transfer systems in order to ensure that they are registered or licensed, and that they are included in the system of prevention of money laundering and terrorism financing; Prohibit the existence of informal money or value transfer systems and provide sanctions in case of breach of the ban</b>				
<b>Activities</b>	<b>Main Implementing Agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>

- Establish a working group to analyse the situation and give recommendations for the implementation of Recommendation 1.12 into the legislative system	Ministry of Finance and NBS	End of 2009	Paper on situation analysis developed and adopted by the Government in the form of a conclusion. Increased engagement of competent supervisors in the registering of all forms of money transfer and punishing informal money transfer forms.	
- The Working Group will submit its recommendations for the said situation analysis to the SCG, which will transfer them to the Government for adoption in the form of conclusion	SCG	End of 2010		

**3.1.13. Warsaw convention should be ratified**

<b>Activities</b>	<b>Main Implementing Agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
Initiation of the procedure and transferring of the Convention for ratification	Ministry of Justice	Implemented	Law Ratifying the Convention published in the 'RS Official Gazette', No. 19/09	

**3.1.14. The Law on Registration of Business Entities and the Law on Taxation Procedure and Taxation Administration should be amended, concerning the documentation required for registration and identification number assignment, so as to prevent anonymous companies or companies with unknown owners from becoming founders of domestic companies.**

<b>Activities</b>	<b>Main</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
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	<b>Implementing Agency</b>			
The adopted amendments of the Law on Taxation Procedure and Administration ('RS Official Gazette' No. 20/09), constitute the required amendments of the legal provisions; new amendments are not necessary to implement the National AML/CFT Strategy.	Tax Administration	Implemented		
<b>3.1.15. The operation of “other financial institutions” should be regulated in order to regulate the issuing and operating payment cards.</b>				
<b>Activities</b>	<b>Main Implementing Agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
This recommendation will be satisfied through incorporation of appropriate provisions into the new law on banks	NBS	Beginning of 2011	Amendments to the new law on banks made and published in 'RS Official Gazette’.	Resources are sufficient

## AML/CFT STRATEGY RECOMMENDATIONS

### 3.2. INSTITUTIONAL LEVEL

<b>3.2.1. Public Prosecutor’s Office:</b> - district public prosecutors should designate deputy public prosecutors for the areas in their jurisdiction who will be functionally and geographically competent to act in money laundering and terrorism financing cases as well as to recommend proceeds confiscation measures in cases that are not linked to organized crime				
Activities	Main Implementing Agency	Timeframe	Indicators	Resources required
Designate and enhance capacities of deputy prosecutors at competent prosecutors' offices that are competent to monitor and work on ML, TF, and seizure/confiscation cases, in cases that are not related to organised crime.	Republic Public Prosecutor and other competent public prosecutors' offices	Ongoing task	Increased quality of initial acts instituting criminal proceedings in ML/FT area and pronouncing of seizure/confiscation measures	
<b>3.2.2. Courts:</b> - district and municipal courts’ presidents will designate, in the annual roster, the investigative and other judges who will act in cases of money laundering and terrorism financing cases as well as in issuing provisional proceeds confiscation measures in cases that are not linked to organized crime				
Activities	Main Implementing Agency	Timeframe	Indicators	Resources required

Designate investigative and other judges for the implementation of this recommendation and enhance their capacities in AML/CFT and provisional confiscation measures, in cases that are not related to organised crime	Competent courts	End of 2009 and ongoing	Increased level of professionalism and quality of investigation in the area of ML and TF, increased number of pronounced provisional measures of confiscation of proceeds from crime.	
<b>3.2.3. Ministry of the Interior:</b> - police officers in economic crime suppression sections who will deal with detecting money laundering and terrorism financing should receive specialized training; - separate organizational units should be established to deal with financial investigations at the level of the Interior Ministry and the police administrations.				
Activities	Main Implementing Agency	Timeframe	Indicators	Resources required
Designate police officers to deal with detection of ML and TF in divisions for suppression of economic crime and establish divisions for financial investigations i.e. prevention of money laundering in police directorates through developing new jobs systematisation at the Ministry of Interior	Crime Police Directorate	2009	Modified jobs systematisation at the Ministry of Interior, specialisation of police officers in the field of ML/TF detection.	Human resources, funds for equipment and training
<b>3.2.4. Customs Administration:</b>				

**- a database should be established recording the transportation of cash and bearer securities across the state border in amounts larger than EUR 10,000 in accordance with the FATF Special Recommendation No. 9 (cash couriers) and the EU Regulation concerning the control of cash movement across EU borders;**  
**- a number of work posts for the analysis of the data referred to in the previous item should be provided for in the systematization of posts**

<b>Activities</b>	<b>Main Implementing Agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
- Pass a Rulebook concerning the declaration of transportation of bearer negotiable instruments	Ministry of Finance	September 2009		
- Print declaration forms for declaration of transportation of bearer negotiable instruments and place notifications at border crossings concerning the declaration of such instruments	Customs Administration	September 2009		Available
- establishment and harmonisation of data held by the Customs Administration with the new requirements	Customs Administration with the assistance of APML and other State bodies	First half of 2010	Harmonisation of different IT systems of several State bodies; Periodical coordination and consultation meetings among the State bodies.	- human and financial resources
- A next rulebook on organisation and jobs systematisation will provide for new workplaces in line with the Recommendation, applicable legislation, and available human resources.	Customs Administration	During 2010		

**3.2.5. Ministry of Justice:**

**- a number of employees should specialize in international legal assistance tasks in the area of money laundering, financing of terrorism and confiscation of proceeds**

<b>Activities</b>	<b>Main implementing</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
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	<b>agency</b>			
New Job Classification Act for the Ministry of Justice should provide for new posts in line with this recommendation	Ministry of Justice	First half of 2010	Civil servants working on mutual legal assistance in money laundering and terrorism financing matters	Human and technical
<b>3.2.6. Games of Chance Administration (GCA) and Tax Administration (TA):</b> - certain number of employees should be trained to supervise the implementation of AML/CFT by the obligors engaged in organizing games of chance				
<b>Activities</b>	<b>Main implementing agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
- GCA should select and train through a specially designed training the employees authorized to conduct supervision	GCA	First half of 2010	Civil servants of GCA appropriately trained for supervision of the implementation of AML/CFT Law; specialized training for officers of TA	Engaging a sufficient number of employees for supervision activities and providing training for all the employees of Supervision Department and Tax Police Department within TA, and for the employees of GCA.
- TA should select and train through a specially designed training the employees authorized to conduct supervision in line with their term of reference (supervision of and establishing taxes)	TA			
<b>3.2.7. National Bank of Serbia (NBS):</b> - shall classify a sufficient number of posts and form a special team to supervise the implementation of AML/CFT Law by the obligors				
<b>Activities</b>	<b>Main implementing</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>

	<b>agency</b>			
Current supervisors from Bank Supervision Department, Insurance Supervision Department and Voluntary Pension Funds Supervision Department shall supervise the implementation of AML/CFT Law in the area of banking and insurance operations. A larger number of employees should be hired in supervision of financial leasing providers' operations for ensuring a more effective implementation of AML/CFT Law. Internal acts on organization and job classification in the NBS should be amended.	NBS	End of 2010.	Amendment of internal acts on job classification in the NBS, increased number of employees for supervision of financial leasing providers.	Human resources and technical equipment
<b>3.2.8. Securities Commission (SC):</b>				
<b>- shall specialize a sufficient number of the currently employed for supervision of AML/CFT Law by the obligors</b>				
<b>Activities</b>	<b>Main implementing agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
All the employees of the SC should be specialized for the supervision of AML/CFT Law through a specially designed training for supervision in the area of capital market and securities.	SC in cooperation with other relevant authorities	2010	Specially designed training for the employees of SC for AML/CFT Law supervision in the capital market and securities.	Funds for organizing the training and possibly human resources
<b>3.2.9. Financial and technical conditions for connecting databases of relevant state authorities should be provided</b>				
<b>Activities</b>	<b>Main implementing agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
Recommendation 2.9 will be implemented through the Customs Administration project under IPA 2010	Ministry of Finance - Customs	2010	CA Project	Human resources



	Administration			
<b>3.2.10. Special and specialized bodies or working groups should be established within associations of obligors referred to in AML/CFT Law, with the aim of analyzing and interpreting regulations, technical support in the data exchange, proposing and amending regulations, training, etc.</b>				
<b>Activities</b>	<b>Main implementing agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
-the establishment of working groups in the associations of obligors should be initiated, based on the model of Compliance Board within the Serbian Bankers' Association -APML and supervisory authorities should participate in establishing the above	APML Supervisory authorities	Year 2010 – 2011	Working groups within the associations of obligors in place, to interpret regulations, provide technical support in data exchange, initiate amendments to regulations.	

**AML/CFT STRATEGY RECOMMENDATIONS**  
**3.3. OPERATIONAL LEVEL**

<p><b>3.3.1. Cooperation should be formalized among relevant state authorities (APML, police, SIA, supervisory authorities for AML/CFT, Tax Administration, Customs Administration, Foreign Exchange Inspectorate) in order to:</b></p> <ul style="list-style-type: none"> <li>- work on specific cases;</li> <li>- train the employees of the state authorities and hold joint training of the obligors;</li> <li>- efficiently engage in international cooperation;</li> <li>- coordinate participation in international organizations and bodies.</li> </ul>				
Activities	Main implementing agency	Timeframe	Indicators	Resources required
- Standing Coordination Group should be established	All state authorities	Year 2009- done	Bilateral agreements on cooperation	Human and material resources
<ul style="list-style-type: none"> <li>- relevant authorities shall consider modes of cooperation</li> <li>- bilateral agreements should be signed between relevant authorities which do not have such agreements in place</li> <li>- necessary positions should be provided in a job classification for implementing the agreements</li> <li>-the agreements should establish adequate procedures for compiling data and accessing databases</li> <li>- regular consultative meetings should be established as practice</li> </ul>	All state authorities	Years 2010 – 2011	between state authorities and possibilities to use each other’s databases, consultative meetings once in six months	



<p>- procedures should be finalized to constitute operational <i>ad hoc</i> working groups which work on specific cases, which will include public prosecutors and deputy public prosecutors that handle and monitor AML/CFT cases in municipality and district prosecutor's offices</p> <p>- where necessary, authorities should amend acts on job classification to delegate authorized officers from AML/CFT organizational unit into the ad hoc operational working group. Until the amendments of job classification are complete, current personnel should be delegated for the mentioned purposes</p> <p>- practice should be established of holding regular meetings of the operational working group with prosecutor's office representatives</p>	<p>All state authorities</p>	<p>Now</p>	<p>Ad hoc working groups for specific cases formed; Acts on job classification amended; practice of holding meetings once in three months with prosecutor's office representatives established.</p>	<p>There are necessary resources</p> <p>Human resources Technical support</p>
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**3.3.3. Liaison officers should be appointed in APML, MoI, TA, CA, SIA and Public Prosecutor's Office to work on specific AML/CFT cases.**

Activities	Main implementing agency	Timeframe	Indicators	Resources required
- procedures to appoint liaison officers should be finalized	APML, MoI, CA, TA, SIA, Public Prosecutor's Office, MSA	First half of year 2010	Liaison officers appointed	Human resources Technical support

**3.3.4. Tax Police and Customs Administration should ensure that in undertaking the actions within their term of reference they check for the elements of money laundering and terrorism financing criminal offences**

Activities	Main implementing agency	Timeframe	Indicators	Resources required
-rulebooks on organization and job classification for the Customs Administration and Tax Administration should provide for duties and responsibilities of checking for elements of money laundering and terrorist financing criminal offences - Capacities of the authorized personnel of the Customs Administration and of the Tax Police inspectors should be strengthened in terms of checking for the elements of ML and TF criminal offences through regular notifications on current trends in ML and FT and through training.	Customs Administration, Tax Administration	Year 2010, and onwards	Descriptions of certain positions within the Customs Administration and Tax Administration amended, responsibilities of checking for the elements of ML and TF provided for.	Human resources

**3.3.5. APML should ensure signing MOUs with all FIUs for which having such an agreement in place is a pre-requisite for international information exchange**

Activities	Main implementing agency	Timeframe	Indicators	Resources required
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<ul style="list-style-type: none"> <li>- FIUs which require MOUs in place as a pre-condition for information exchange should be identified</li> <li>- Process of signing MOUs should be initiated</li> <li>- MOUs should be concluded</li> </ul>	APML	2009 -2011	MOUs with FIUs signed	
<b>3.3.6. APML should make sure to initiate and participate in developing indicators for identifying suspicious transactions, together with AML/CFT Law supervisory authorities and associations of obligors. Other state authorities should be included in developing indicators as well.</b>				
<b>Activities</b>	<b>Main implementing agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
<ul style="list-style-type: none"> <li>- indicators should be drafted</li> <li>- opinions of AML/CFT Law supervisory authorities and of other state authorities, where necessary, should be compiled in writing</li> <li>-opinions of the obligors should be compiled in writing</li> </ul>	APML	The end of 2010	Indicators developed	
<b>3.3.7. APML should ensure that practical mechanisms of providing feedback to the obligors be elaborated</b>				
<b>Activities</b>	<b>Main implementing agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
<ul style="list-style-type: none"> <li>-meetings with all obligors should be organized on a regular basis</li> <li>- written materials on trends and typologies of ML/FT should be prepared</li> <li>- case studies from practice should be prepared</li> <li>- reports on received suspicious transaction reports (STRs) and cash transaction reports (CTRs), their number and quality should be presented</li> </ul>	APML	Ongoing	Practice in place to hold meetings once in six months with representatives of the obligors, obligation to prepare written materials on trends and typologies of ML and TF	Human resources

**3.3.8. APML should develop forms for providing data on torts and economic offences referred to in the AML/CFT Law, in cooperation with MoI, public prosecutor's office, courts and supervisory authorities for AML/CFT Law.**

Activities	Main implementing agency	Timeframe	Indicators	Resources required
<ul style="list-style-type: none"> <li>- Working group for developing the forms should be established, and the forms should be developed</li> <li>- state authorities shall provide their local organizational units with the forms and the instruction on fulfilling the legal requirement from this recommendation</li> </ul>	APML, MOI, State Prosecutor's Office, Supreme Court of Serbia	Second half of 2010	Working group established, forms and instructions developed, forms provided to local organizational units	

**3.3.9. All relevant supervisory authorities in terms of AML/CFT Law should do the following:  
 - develop instructions or manuals for exercising supervision of the implementation of AML/CFT by the obligors  
 - develop instructions for the implementation by the obligors of the provisions of the new AML/CFT Law**

Activities	Main implementing agency	Timeframe	Indicators	Resources required
<ul style="list-style-type: none"> <li>- current instructions/guidelines issued by supervisory authorities to the obligors (banks, exchange offices, etc) should be brought in compliance with AML/CFT Law</li> <li>- instructions/guidelines on supervision should be developed for the obligors which presently do not have them (Securities Commission, providers of financial leasing in part which refers to the implementation of AML/CFT regulations, insurance, etc)</li> </ul>	All supervisory authorities	31.12.2009.	Instructions and guidelines for all supervisory authorities compliant with AML/CFT Law	

- work on developing guidelines for ML/TF risk assessment, on decision on minimum content of <i>Know Your Customer Procedure</i> and similar guidelines/instructions for exercising supervision of other obligors should be finalized.	All supervisory authorities, except the National Bank of Serbia, in cooperation with the APML	End of 2010.		
<b>3.3.10. There should be systematic awareness raising in terms of need to effectively implement AML/CFT Law (brochures, electronic programs for training, media campaign, etc)</b>				
<b>Activities</b>	<b>Main implementing agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
- brochures on AML/CFT should be prepared and printed	APML	Ongoing	The brochures made and distributed to all the obligors, financial resources raised through the projects of international organizations	- financial resources
-the brochures should be distributed to banks and other obligors, as well as to other state authorities  -financial resources for printing and publishing the materials should be raised by the projects of international organizations	State authorities and supervisory authorities			
- the media should be animated	All state authorities			
<b>3.3.11. Analysis of the state of affairs in NPO sector should be conducted to assess ML/TF risk in the area</b>				
<b>Activities</b>	<b>Main implementing agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
- a working group should be established to conduct the analysis	Ministry of Public	End of 2010	The working group	



<p>from the recommendation          -an open discussion and/or round table should be held to bring together different opinions of the analysis from the recommendations          - Government of the Republic of Serbia shall adopt the conclusion of the state of affairs in NPO sector</p>	<p>Administration and Local Self-Government, Ministry of Interior, Ministry of Foreign Affairs, APML, TA</p>		<p>formed, analysis of NPO sector conducted, open discussion held, Government conclusion adopted</p>	
<p><b>3.3.12. Information system in APML should be further developed</b></p>				
<p><b>Activities</b></p>	<p><b>Main implementing agency</b></p>	<p><b>Timeframe</b></p>	<p><b>Indicators</b></p>	<p><b>Resources required</b></p>
<p>- case and document management system should be finalized          - analytical tools should be developed</p>	<p>APML</p>	<p>Ongoing</p>	<p>Information system for case and document management launched</p>	<p>Budget of the Republic of Serbia and foreign donations</p>

## AML/CFT STRATEGY RECOMMENDATIONS

### 3.4. PROFESSIONAL QUALIFICATION AND TRAINING

<b>3.4.1. Needs for professional qualification and training should be analysed to include relevant state and supervisory authorities, as well as the obligors through their associations</b>				
Activities	Main implementing agency	Timeframe	Indicators	Resources required
A working group should be formed to analyse the needs and cite the number of employees, number of seminar, necessary training materials, etc	All stakeholders in AML/CFT (state authorities, supervisory authorities, representatives of the obligors)	First half of 2010.	Working group formed, number of employees to be trained, established, training materials established.	Necessary financial funds should be raised through donations
<b>3.4.2. Professional training and qualification for AML/CFT should be organized through Judicial Training Center, Educational and Research Centre of SIA, Education Centre within MoI and through specialized bodies within the supervisory authorities.</b>				
Activities	Main implementing agency	Timeframe	Indicators	Resources required
-a working group should be formed to consist of existing	Representatives	First half of	Working group	

<p>training centres that conduct internal training (State Prosecutor's Office) and professional specialization. With the help of the experts from APML and other relevant state authorities, capacities of the training centres should be evaluated - plan and program of the specialized training should be made</p>	<p>of the training centres and of the bodies which conduct internal training (State Prosecutor's Office) and SCG</p>	<p>2010</p>	<p>formed, plan and program of the specialized training made.</p>	
<p><b>3.4.3. Educational parts dealing with AML/CFT, financial investigations and asset forfeiture (confiscation) should be included in the program for professional and specialized training.</b></p>				
<p><b>Activities</b></p>	<p><b>Main implementing agency</b></p>	<p><b>Timeframe</b></p>	<p><b>Indicators</b></p>	<p><b>Resources required</b></p>
<p>The working group from Recommendation 4.2. shall propose the relevant educational parts having in mind the practice of similar institutions abroad.</p>	<p>Existing training centres and representatives of other state authorities that conduct internal training according to the suggestions of the working group from Recommendation 4.2.</p>	<p>Starting from 2010</p>	<p>Certain educational parts from AML/CFT</p>	<p>Material and technical support to organize trainings</p>
<p><b>3.4.4. Representatives should be selected from the Ministry of Interior, Ministry of Justice, public prosecutor's office, courts, Administration for the Prevention of Money Laundering, Customs Administration, Tax Administration, National Bank of Serbia and Securities Commission and they will be in charge of professional training and specialization in AML/CFT, financial investigations and asset forfeiture (hereinafter referred to as the instructors). The same is recommended to the obligors' associations.</b></p>				

Activities	Main implementing agency	Timeframe	Indicators	Resources required
Process of selecting representatives of the relevant state authorities and obligors' associations in charge of professional training and specialization should be finalized.	Ministry of Interior, Ministry of Justice, public prosecutor's offices, courts, APML, CA, TA, NBS, SC, Ministry of Defense (Military Security Agency)	Second half of 2010	Instructors selected in the state authorities and obligors' associations	Technical and other conditions for work
Following the completion of the needs analysis referred to in Recommendation 4.1, the instructors should be nominated in line with the results of the analysis within the authorities which s do not have them yet.				
<b>3.4.5. Instructors should be professionally trained in AML/CFT, financial investigations and asset forfeiture, as well as in methods and techniques of their work.</b>				
Activities	Main implementing agency	Timeframe	Indicators	Resources required
<ul style="list-style-type: none"> <li>- Organisation of seminars on techniques and methods of professional training (<i>train the trainers</i>)</li> <li>- Organisation of seminars for additional training of instructors in AML/CFT</li> <li>- Professional AML/CFT training delivered by the representatives of relevant state authorities to the instructors</li> </ul>	SCG	2010 – 2011	Seminars organized	Material resources

- mentioned activities should use the services of international organizations which have years of experience and experts in AML/CFT, financial investigations and asset forfeiture				
<b>3.4.6. Technical and other conditions for the work of instructors should be provided</b>				
<b>Activities</b>	<b>Main implementing agency</b>	<b>Timeframe</b>	<b>Indicators</b>	<b>Resources required</b>
- financial means should be provided to support the instructors' work	Ministry of Interior, Ministry of Justice, public prosecutor's office, courts, APML, CA, TA, NBS, SC, obligors' associations, Ministry of Defense (Military Security Agency)	Ongoing	Financial means provided	