**Administration for the Prevention of Money Laundering**

**Annual Report for 2023**

Belgrade, March 2024

Administration for the Prevention of Money Laundering

24 Resavska, 11000 Belgrade

Table of Contents

[NATIONAL COORDINATION, RISK ASSESSMENT, AML/CFT STRATEGY 3](#_Toc179800789)

[LEGAL AFFAIRS AND HARMONISATION OF LEGISLATION WITH INTERNATIONAL STANDARDS 4](#_Toc179800790)

[Law on the Prevention of Money Laundering and Terrorism Financing 4](#_Toc179800791)

[Law on the Freezing of Assets with the Aim of Preventing Terrorism and Proliferation of Weapons of Mass Destruction (LAF) 4](#_Toc179800792)

[APML opinions concerning the application of the legislation whose formal proponent is the APML 5](#_Toc179800793)

[Action Plan for implementing the Strategy against Money Laundering and the Financing of Terrorism for 2022-2024 5](#_Toc179800794)

[Contribution to drafting and amending legislation under the remit of other authorities 6](#_Toc179800795)

[Other areas of work of the Team for legal affairs and harmonisation of legislation with international standards 6](#_Toc179800796)

[Professional licencing examination for compliance officers 6](#_Toc179800797)

[INTERNATIONAL COOPERATION 6](#_Toc179800798)

[Participation in MONEYVAL activities 6](#_Toc179800799)

[Interaction with FATF 7](#_Toc179800800)

[Egmont Group-related activities 7](#_Toc179800801)

[Cooperation with the Eurasian Group (EAG) 8](#_Toc179800802)

[Other international cooperation 8](#_Toc179800803)

[Bilateral cooperation with the United Arab Emirates 8](#_Toc179800804)

[Cooperation with the US Embassy in Belgrade, OPDAT, EXBS 9](#_Toc179800805)

[Interaction with GIZ 9](#_Toc179800806)

[APML role in the EU - Serbia negotiation process 9](#_Toc179800807)

[FINANCIAL INTELLIGENCE - ANALYTICS 10](#_Toc179800808)

[Sector for analysis and prevention of the financing of terrorism comprises a Pre-analysis team, Section for analysis of suspicious transactions, Section for interagency cooperation and Team for prevention of terrorism financing (CFT Team). 10](#_Toc179800809)

[In 2023, the Sector for analysis and counter-terrorist financing opened 1.049 new cases. In addition to working on newly opened cases, APML analysts acted upon a large number of cases which were opened in previous years. 10](#_Toc179800810)

[PREANALYSIS TEAM AND SECTION FOR STR ANALYSIS 10](#_Toc179800811)

[SECTION FOR INTERAGENCY COOPERATION 11](#_Toc179800812)

[Prosecutors’ offices 11](#_Toc179800813)

[APML took an active part in financial investigations, following up on multiple requests sent to it by prosecutors in 2023. 12](#_Toc179800814)

[Ministry of the Interior 13](#_Toc179800815)

[Security Information Agency 13](#_Toc179800816)

[Tax Administration 13](#_Toc179800817)

[Agency for the Prevention of Corruption 14](#_Toc179800818)

[National Bank of Serbia 14](#_Toc179800819)

[Customs Administration 14](#_Toc179800820)

[Cooperation with foreign counterparts 14](#_Toc179800821)

[TEAM FOR PREVENTION OF THE FINANCING OF TERRORISM (CFT TEAM) 15](#_Toc179800822)

[STRATEGIC ANALYSIS BY SECTOR FOR ANALYSIS AND COUNTER TERRORIST FINANCING 15](#_Toc179800823)

[SUPERVISION OF COMPLIANCE WITH AML/CFT LAW BY ACCOUNTANTS AND FACTORING FIRMS 16](#_Toc179800824)

[Offsite supervision 16](#_Toc179800825)

[Preventive activity 17](#_Toc179800826)

[Onsite supervision 17](#_Toc179800827)

[Onsite examinations conducted 18](#_Toc179800828)

[Onsite supervision of compliance with the Law on Centralized Records of BOs 20](#_Toc179800829)

[Onsite supervision of compliance with the LAF 20](#_Toc179800830)

[Court Decisions 20](#_Toc179800831)

[IT SUPPORT TO FIU CORE FUNCTIONS 20](#_Toc179800832)

[FATCA 21](#_Toc179800833)

[INTERNAL ORGANISATION AND HUMAN RESOURCES 21](#_Toc179800834)

[GENERAL, MATERIAL AND FINANCIAL OPERATIONS 22](#_Toc179800835)

[ANNEX 1: TRAINING EVENTS ATTENDED BY APML STAFF (AUDIENCE AND/OR PRESENTER(S)) 24](#_Toc179800836)

# NATIONAL COORDINATION, RISK ASSESSMENT, AML/CFT STRATEGY

The Administration for the Prevention of Money Laundering (APML) is represented at the Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT Coordination Body)[[1]](#footnote-1) as experts and technical support staff.

The National AML/CFT Coordination Body tasks include, among other things, ensuring that the national risk assessment (NRA) findings are taken into account when developing or updating the National Strategy against Money Laundering and the Financing of Terrorism and its Action Plan (AML/CFT Strategy) and regular monitoring of implementation of the AML/CFT Strategy and coordination of action.

In this regard, the work to develop a new (2022-2024) Action plan for implementing the AML/CFT Strategy (2022-2024 Action Plan)[[2]](#footnote-2) started in late 2021/early 2022, and resulted in an updated Action Plan which was approved by the Serbian Government on 17 March 2022.

The Action Plan was formally proposed by the Ministry of Finance. The 2022-2024 Action Plan was drafted by a Working Group established by the Minister of Finance that comprised a WG Chair (APML Director) and 43 members representing 20 authorities and institutions.

The updated 2022-2024 Action Plan took into account the findings of the National ML Risk Assessment, National TF Risk Assessment, National ML/TF Risk Assessment in the Digital Assets Sector, and National PWMDF Risk Assessment which were adopted by the Serbian Government on 30 September 2021. Account was taken of the outstanding 2020-2022 Action Plan action items and MONEYVAL recommendations.

In order to implement certain Action Plan items the Chair of the AML/CFT Coordination Body established 10 expert teams with clear tasks as set out in the 2022-2024 Action Plan. Each of the expert teams have their chair (coordinator) and members representing various institutions, including the APML.

Two expert teams completed their tasks. These are the Expert team for analysing the legal framework governing the physical transportation of BNIs and Expert team for developing new or updating current Guidelines for filing SARs to the APML.

The other expert teams continuously work towards meeting the tasks under the set timeframes. Amongst the above expert teams are also the Expert team for developing a specific ML/TF risk assessment in the real estate sector, and the Expert team for analysing cases and identifying ML/TF trends and typologies.

# LEGAL AFFAIRS AND HARMONISATION OF LEGISLATION WITH INTERNATIONAL STANDARDS

The APML is the formal proponent of two laws, i.e. the Law on the Prevention of Money Laundering and the Financing of Terrorism (Official Gazette of RS, 113/17, 91/19, 153/20 and 92/23) and Law on Freezing of Assets with the Aim of Preventing Terrorism and Proliferation of WMD (Official Gazette of RS, 29/2015, 113/2017 and 41/2018).

## 

## Law on the Prevention of Money Laundering and Terrorism Financing

The Law on the Prevention of Money Laundering and Terrorism Financing (AML/CFT Law) was adopted on 14 December 2017 and subsequently amended in December 2019, 2020 and September 2023. This law was passed with the aim of harmonising the national AML/CFT legislation with international standards (FATF recommendations, Fourth EU Directive), as well as the MONEYVAL 2016 Mutual Evaluation Report (MER) recommendations.

The most recent AML/CFT Law amendments included the Central Securities Depository and Clearing House (CSD) on the list of obliged entities under this law.

The AML/CFT Law is further specified in two regulations, i.e. Rulebook on the Methodology for Complying with the AML/CFT Law (Official Gazette of RS, no. 80/20) and Rulebook on the professional licensing examination for compliance officers (Official Gazette of RS, No. 104/20).

## Law on the Freezing of Assets with the Aim of Preventing Terrorism and Proliferation of Weapons of Mass Destruction (LAF)

The Law on Freezing of Assets with the Aim of Preventing Terrorism was passed on 20 March 2015. The main objective of this law was to improve the fight against terrorism by establishing a system of preventive and repressive measures against terrorist financing as the prior necessary step in the commission of terrorist acts. By passing this legislation, Serbia complied with the provisions of Chapter VII of the United Nations (UN) Charter, which requires that the UN member states take measures to implement resolutions adopted by the UN Security Council (UNSC) within its powers.

In order to comply with FATF Recommendation 6 and remedy the deficiencies found in the MONEYVAL 2016 MER for Serbia, this law was amended in December 2017. Additionally, the law was amended again in May 2018 in order to implement FATF Recommendation 7 - its provisions on targeted financial sanctions (TFS) were extended in May 2018 to proliferation of WMD, so the title of this law now is Law on Freezing of Assets with the Aim of Preventing Terrorism and Proliferation of WMD (LAF).

Certain LAF provisions are further specified in the Rulebook on the manner of notifying natural and legal persons about modifications to the lists of designated persons and on the manner of filing reports, information and data concerning a designated person and their assets (Official Gazette of the Republic of Serbia, No 78/2018).

## APML opinions concerning the application of the legislation whose formal proponent is the APML

The Team for legal affairs and harmonisation of legislation with international standards drafts opinions concerning the application of the AML/CFT Law, LAF and related by-legislation.

The opinions are posted on the APML website under ‘Strucna misljenja’[[3]](#footnote-3)

## Action Plan for implementing the Strategy against Money Laundering and the Financing of Terrorism for 2022-2024

The Team was represented by a staff member in the following Expert Teams established in order to implement the 2022-2024 Action Plan for implementing the AML/CFT Strategy:

* Expert team for analysing the legislative framework, its application and current situation in the sectors identified as posing higher TF risk levels (e-money issuers, postal operators, payment institutions, etc.);
* Expert team for analysing the legislation, in a participatory process, related to the operation of competent authorities in the area of registration and de-registration, record-keeping and cooperation with non-profit organisations, and in order to develop a separate analysis of activity of the NPO sector, in a participatory manner, with the aim of mitigating TF vulnerabilities;
* Expert team for analysing the legal framework governing the physical transportation of BNIs;
* Expert team for analysing threats in relation to operation of third-country e-money institutions;
* Expert team for developing a separate ML/TF risk assessment in the real estate sector, and provided input to this team by preparing an *Analysis of real estate trade in the Republic of Serbia and relevant AML/CFT stakeholders* and
* Expert team for developing a Money Laundering and Terrorist Financing Risk Assessment of Legal Persons and Legal Arrangements in the Balkans, and provided input to this team by preparing an *Analysis of certain ML/TF/WMDPF risk factors in the procedure of establishing companies and relevance of public notaries in this procedure.*

## Contribution to drafting and amending legislation under the remit of other authorities

The APML’s legal team was represented in the following Working Groups:

* WG to develop a Draft Law Amending the Law on Real Estate Trade and Lease;
* WG to develop a Draft Law on the Central Records of Beneficial Owners;
* WG to develop the 2023 - 2028 National Anti-Corruption Strategy and the related Action Plan.

## Other areas of work of the Team for legal affairs and harmonisation of legislation with international standards

In addition to the above, the Team:

* Follows-up on requests for access to information of public interest, in line with Article 16 of the Law on Free Access to Information of Public Interest (Official Gazette of RS, 120/2004, 54/2007, 104/2009, 36/2010 and 105/2021);
* drafts *opinions of no obstacle on the side of the buyer or strategic investor* for entering into a contract, prior to contract conclusion, that are provided to the Ministry of Economy pursuant to Article 13 para 1 of the Privatisation Law (Official Gazette of RS, 83/14, 46/15, 112/15 and 20/16-authentic interpretation);
* drafts *opinions* on legislation falling under the remit of other authorities;
* follows-up on National Bank of Serbia requests for information related to existence of any ML/FT suspicion as part of the licencing (*fit and proper*) procedure.

## Professional licencing examination for compliance officers

In 2023, APML completed 4 licencing examinations, each comprising a written test and oral examination.

Pursuant to Article 18 of the Rulebook on the Professional Licensing of Compliance Officers, APML issued 68 compliance officer licences.

# INTERNATIONAL COOPERATION

## Participation in MONEYVAL activities

Two MONEYVAL plenary meetings were held in 2023**:** 65th Plenary Meeting on 22–26/5/2023 and 66th Plenary Meeting on 11–15/12/2023 in Strasbourg that were attended by the Serbian delegation comprising the delegates from APML, Ministry of Interior, and National Bank of Serbia.

Serbia reported to MONEYVAL in 2023 on the progress in complying with Recommendation 15 (New Technologies), especially with respect to criterion 15.11 in relation to international cooperation in supervising VASPs. The APML, NBS and Securities Commission have provided input on compliance with Recommendation 15 that lead to an upgrade of the rating to *largely compliant* on this Recommendation, and this was acknowledged in the 5th Enhanced Follow-Up Report adopted by Moneyval at its December 2023 Plenary.

Serbia also served as rapporteur for the evaluation of Cyprus on Recommendations 8 and 31 which was on the agenda of the Moneyval 2023 December Plenary.

APML director participated as LEA assessor in the MONEYVAL’s assessment of Bosnia and Herzegovina under the 5th round. The onsite visit took place in February 2024. APML also collected (from police, prosecutor’s office, Justice Ministry, Customs Administration, NBS, and Securities Commission) and provided information to the Moneyval Secretariat on the risks and international cooperation with BiH.

On 25 April 2023, MONEYVAL held its high-level meeting in Warsaw, Poland, hosted by the Ministry of Finance of Poland. The meeting was attended by the APML director and an assistant Minister of Finance.

In addition, the 15th Conference of the Parties to the Warsaw Convention was held in Strasbourg on 9–10 November 2023, which was attended by a Justice Ministry representative, being an appropriate expert given the topics on the agenda.

In the context of preparation for the 6th round of MONEYVAL assessments, the APML engaged in 2023 to encourage as many authorities as possible to take part in training on international standards. Among other things, toward the end of 2023, the APML and authorities made a list of candidates, which also included APML staff, to undergo a 6th round assessor training. The assessor training is essential for MONEYVAL in order to ensure good implementation of the 6th round of MONEYVAL assessments, and for Serbia given the forthcoming assessment of Serbia by MONEYVAL under the 6th round.

## Interaction with FATF

FATF (Financial Action Task Force) is the global AML/CFT standard-setter. The standards are checked for compliance in individual countries by FATF or FATF-style regional bodies (FSRBs), i.e. Council of Europe MONEYVAL Committee in the case of Serbia.

APML's commitment to building capacity and spreading knowledge on international standards also lead to the participation of two APML staff members in FATF Standards Training Course at the FATF Training Institute in Busan, South Korea, from May 29 - June 2, 2023, as well as two representatives of the Ministry of Interior on September 11-15, 2024. APML staff also participated in the training on the ICRG process that was held at the FATF headquarters in Paris, October 30 - November 2, 2023. An APML representative attended a FATF Train the Trainers course at the FATF Training Institute in Busan, South Korea, on November 27 - December 2, 2023.

The APML, Ministry of Interior, NBS and Securities Commission jointly prepared answers to the FATF Questionnaire on crowdfunding for the purposes of financing terrorism.

## Egmont Group-related activities

Egmont Group (EG) is a global association of financial intelligence units which promotes cooperation between FIUs and financial intelligence sharing using the Egmont Group secure website. EG members must meet the standards and criteria in the Egmont Group Charter and Principles for Information Exchange. As in March 2024, Egmont Group has 174 member FIUs.

EG meets once a year in a plenary session, and once more at the level of its working groups. Three important meetings were held in 2023.

**Annual EG Working Group and Regional Group meetings from 30/1 to 3/2/2023 in Dakar, Senegal**. The meetings were attended by 287 from EG member FIUs, 12 observers and one international partner at 15 different meetings discussing the improvement of EG member FIU capacities, improvement of information sharing and cooperation to achieve EG goals and sharing of experience and knowledge. APML was not represented at these meetings.

**29th annual Egmont Group Plenary was held on 3–7/7/2023 in Abu Dhabi, UAE**. 533 delegates participated (along with 12 observers and one international partner). This plenum is significant because on July 5, the Heads of FIUs made a strategically important decision to switch from the old EG IT system to a modern collaborative IT infrastructure that was put into operation on October 1, 2023. The APML was represented by assistant director who, apart from the meetings of the HoFIUs, also participated in the work of the Membership, Support and Compliance Working Group (MSCWG), as well as in the meeting of the Europe II regional group.

In addition to these two regular sessions, on 10/18/2023 the EG Chair convened a special virtual HoFIU session (the highest EG decision-making body based on consensus) discussing the report and recommendations of the Egmont Committee concerning the EG views on the membership of the FIU of Russian Federation in the Egmont Group.

## Cooperation with the Eurasian Group (EAG)

The EAG is a FATF-style regional body (FSRB) gathering together the Russian Federation, the former Soviet Union Asian countries, India and China. Serbia has the status of observer in the EAG since 2010. In 2023, two EAG plenaries were held, along with working group meetings. The first plenary was held on June 5-9, 2023 in Almaty, Kazakhstan, and the event was attended by APML assistant director and the Terrorist Financing Prevention Team leader, who is also active in the EAG Working Group on Typologies. APML was not represented at the second plenary event, which was held on December 4-8, 2023 in Sania, China.

In 2023, the APML together with the Ministry of Interior, NBS and Securities Commission, responded to the EAG Questionnaire on monitoring of risk of use of VA for criminal purposes.

## Other international cooperation

### Bilateral cooperation with the United Arab Emirates

In order to further improve mutual cooperation, representatives of competent authorities of the United Arab Emirates visited Belgrade on February 2-3, 2023, and met with their Serbian counterparts. APML director and the Head of FIU United Arab Emirates, Ali Faisal Ba'Alawi, signed an MOU between the two FIUs in Belgrade on February 2, 2023. Although the existence of an MOU is not a prerequisite for cooperation and for information sharing, which has successfully taken place for many years, its signing and the high-level meetings, which were held on February 2 and 3, provided an invaluable opportunity for sharing experiences and information on how to improve the two countries’ respective AML/CFT/WMDPF systems.

Areas and issues of mutual interest were set out, with contacts and meetings related to WMDPF prevention continued in 2023.

Also, at the invitation of the UAE authorities, two APML representatives participated at a conference on preventing proliferation financing on May 17 and 18, 2023 in Dubai.

### Cooperation with the US Embassy in Belgrade, OPDAT, EXBS

In 2023, training for representatives of prosecution offices continued on VAT fraud, with APML staff taking part as presenters. As for the Export Control and Related Border Security Assistance (EXBS) Program, a study visit to the United States was organized on September 17-22, 2023 as one of the activities supporting the implementation of Serbia’s Action Plan related to the assessment of risk of proliferation financing. This Program is run by the State Department's Bureau of International Security and Nonproliferation. More generally, cooperation with this program also takes place through meetings and online workshops on attempted violations, or on the actual violation or evasion of US sanctions, and they are aimed largely at supervisory authorities, including those supervising the non-financial sector.

### Interaction with GIZ

APML cooperates with the German GIZ under the Global Program Combating Illicit Financial Flows. In 2023, APML attended meetings/conferences in Skopje, Durrës and Budva, organized by GIZ on strategic partnership in the fight against money laundering and terrorist financing, cooperation with the NPO sector and cryptocurrency. APML director participated in the 2nd regional exchange between HoFIUs from the Western Balkans in Tirana, June 6-7, 2023. Also, the GIZ Office in Belgrade has provided technical support to the APML in order to improve its communication with accounting service providers supervised by the APML for compliance with AML/CFT requirements.

Also, GIZ organized several meetings in 2023 between APML and the judiciary in Belgrade and other regions of Serbia about AML/CFT-related misdemeanours and economic offenses committed by accounting service providers.

### APML role in the EU - Serbia negotiation process

APML contributes to the EU accession negotiation process by following EU AML/FT standards and by planning the harmonisation of Serbian legislation with these standards in a timely manner.

In particular, APML mainly takes part in the in the negotiations on chapters 4 (free movement of capital), 24 (justice, freedom and security), 31 (common foreign and security policy). In 2023, there were no significant activities in these negotiating chapters.

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# FINANCIAL INTELLIGENCE - ANALYTICS

# Sector for analysis and prevention of the financing of terrorism comprises a Pre-analysis team, Section for analysis of suspicious transactions, Section for interagency cooperation and Team for prevention of terrorism financing (CFT Team).

# In 2023, the Sector for analysis and counter-terrorist financing opened 1.049 new cases. In addition to working on newly opened cases, APML analysts acted upon a large number of cases which were opened in previous years.

## PREANALYSIS TEAM AND SECTION FOR STR ANALYSIS

In 2023, obliged entities filed a total of 1.464 SARs to the APML. An overview of the SARs broken down by obliged entity, is shown in the table below:

|  |  |
| --- | --- |
| **Obliged entities** | **Number of SARs filed** |
| **Banks** | 791 |
| **Accountants** | 1 |
| **Auditors** | 11 |
| **Insurance companies** | 15 |
| **Factoring firms** | - |
| **Broker-dealer companies** | 13 |
| **Postal operators** | 8 |
| **Real-estate agents** | 1 |
| **Lawyers** | - |
| **Public notaries** | 197 |
| **Payment institutions** | 279 |
| **Online games of chance providers** | 33 |
| **Currency exchange offices** | 91 |
| **Leasing companies** | 6 |
| **VASPs** | 18 |
| **Total** | **1.464** |
|  |  |
|  |  |

As can be seen from the table above, most of the SARs in 2023 were reported by banks, payment institutions and notaries public.

Of the total number of SARs, 684 were related to earlier cases, i.e. cases opened in previous years, while new pre-analytical cases were opened based on 780 SARs.

An analysis of SARs has showed that a large share of them is still based on the ML typology related to the alleged purchase of secondary raw materials, which indicates the necessity of additional engagement of all AML/CFT stakeholders with the aim of suppressing this phenomenon more effectively.

Also, a large number of SARs refer to transactions between related legal entities and doubts about their economic justification.

Further, an increased number of SARs was noticed involving misrepresentation in VAT returns, in relation to the purchase of goods, whereby unfounded VAT refunds were made harming the budget of the Republic of Serbia.

Also, a number of SARs are related to the trading in digital assets, which may suggest that an increase in the number and total value of transactions related to the purchase of digital assets should be expected in future.

ML through car trade continues to figure as one of the typologies. Money of unknown origin is paid as daily receipts in favor of a legal entity that deals with the sale of cars. The legal entity further transfers the money on the basis of fictitious invoices in favor of another domestic legal entity from whose accounts payments are made to legal entities abroad for the purpose of purchasing a car.

Payments from several companies are noticed to take place, in high amounts, to the accounts of natural persons and entrepreneurs, after which the funds are withdrawn in cash. It is suspected that these natural persons are actually engaged by various criminal groups, and that the funds are returned to the scheme organisers after the withdrawal, for a fee.

Also, there is a continuing trend of company takeover by natural persons who are known to have been owners or legal representatives of companies that were liquidated following their status changes. These business entities are believed to have been misused for the purpose of creating the appearance that actual business is taking place with other business entities, mainly with the aim of reducing tax liabiliites or evading them, without legitimate grounds.

It is important to note that all the persons involved in SARs who were not initially notified to any of the competent authorities or foreign equivalents, for lack of enough grounds for suspicion on a crime, remain under monitoring, and in case of any further CTRs or STRs or other information, an additional analysis is performed and a new assessment is made on whether to disseminate or not.

In 2023, APML sent a total of 10,312 requests for additional information necessary for analysis.

Special mention should be made of the activities of the Sector for Analysis and Prevention of Terrorist Financing, which were more preventive in nature. Specifically, APML had a large number of expert-level meetings and training events, as well as direct contact with compliance officers from a large number of obliged entities in various sectors which have been identified as the most risky in terms of threat and exposure to the risk of being misused for the purpose of money laundering. APML suggested in all these contacts that there shoud be a greater focus on the implementation of the AML/CFT Law provisions aiming at preventive action. In this regard, the obliged entities were reminded of the need to refer more often to the provisions of the AML/CFT Law which regulate the obliged entity’s obligation to refuse to establish a business relationship with the client or to terminate the business relationship where the obliged entity cannot conduct the required CDD. This APML engagement has resulted in an increased number of terminated/unestablished business relationships between obliged entities with such clients, and this positive trend is expected to continue in future.

## SECTION FOR INTERAGENCY COOPERATION

### Prosecutors’ offices

In 2023, competent prosecutors’ offices sent a total of 125 requests to the APML.

|  |  |
| --- | --- |
| **Prosecutor’s office** | **Number of requests** |
| **Public Prosecutor’s Office for Organised Crime** | **25** |
| **Higher prosecutor’s offices** | **98** |
| **Basic public prosecutor’s offices** | **2** |

The reasons for the ML suspicion, indicated in the requests, mainly refer to the following as predicate crimes: tax evasion, abuse of the reponsible person’s office, fraud, spending of assets contrary to the specified purpose, embezzlement, illicit production and circulation of narcotic drugs, association for the purpose of commiting criminal offences, etc. Also, some prosecutors’ offices’ requests aimed at collecting information about individuals whose funds were detained at border crossings on suspicion to originate from illegal activities.

The APML makes disseminations, where it suspects money laundering, to competent prosecutors’ offices in line with the Agreement signed with the Republic Public Prosecutor's Office on 26 April 2017. In 2023, the APML made 102 disseminations to competent prosecutors’ offices.

|  |  |
| --- | --- |
| **Prosecutor’s office** | **Number of disseminated reports** |
| **Public Prosecutor’s Office for Organised Crime** | **7** |
| **Prosecutor’s Office for Cybercrime** | **2** |
| **Higher prosecutor’s offices** | **93** |

Most of the analysis reports and disseminations about suspected ML were shared with the Higher Prosecutor’s Offices, Special Anti-Corruption Departments - 93 in total, 7 disseminations were made to the Prosecutor’s Office for Organised Crime, and 2 to the Prosecutor’s Office for Cybercrime.

Regional distribution of information disseminated to higher prosecutor’s offices is shown in the table below.

|  |  |
| --- | --- |
| **Higher Public Prosecutor’s Office** | **Number of disseminated reports** |
| **Belgrade** | **50** |
| **Kraljevo** | **10** |
| **Niš** | **3** |
| **Novi Sad** | **30** |

In most cases information was disseminated to prosecutor’s offices because of suspicion on simulated legal transactions without a reasonable economic purpose behind (there was no actual trade in goods and services) the aim of which was mainly to deplete legal entities’ bank accounts; and suspicion on corruptive crimes, drug trafficking, forging business documentation, and suspicion on illicit origin of the funds transferred.

## 

## APML took an active part in financial investigations, following up on multiple requests sent to it by prosecutors in 2023.

An increasing number of SARs with the same *modus operandi* that were analysed and shared with the prosecutor’s office, pointed to the need for development of strategic analyses.

### Ministry of the Interior

In 2023, the Ministry of the Interior sent a total of 98 requests to the APML on suspicion of money laundering or terrorism financing. At the request of the Ministry of the Interior, the APML checked, in addition to its own (CTR and STR) databases, data on turnover in bank accounts (for the previous 5 years on average), transfer of money through payment institutions and data from foreign counterpart FIUs using the Egmont Group’s secure website (ESW).

In the course of analysis of SARs reported by obliged entities, the APML sent 31 requests to the Ministry of Interior, requesting information about criminal offences committed, ties with criminal groups in Serbia and all other operational data that the Ministry of Interior held on the subjects. The activities of the subjects of APML’s analyses involved suspicion on illegal origin of funds, drugs trafficking, fraudulent practices, corruptive crimes and terrorist financing.

### Security Information Agency

In 2023, the Security Information Agency sent 45 requests for information to the APML, requesting from the APML to check the databases available to it including bank account turnovers and information on transactions carried out through payment institutions. Most of the information exchanged was related to suspected drug trafficking, smuggling of persons, terrorist financing, ties to criminal organisations and transfers of money of dubious origin to accounts in Serbia.

In addition, as a result of SAR analysis, the APML forwarded to the Security Information Agency for potential further action a total of 30 disseminations. Most disseminations involved foreign nationals holding bank accounts or conducting transactions in commercial banks in Serbia, whose activities raise doubts as to the true purpose of their transactions, or cause suspicion on drug trafficking, fraud, money laundering or terrorist financing.

### Tax Administration

In 2023, the Tax Administration sent 16 requests for information to the APML and the APML made 93 disseminations to the Tax Administration for further action. A large number of disseminations involves suspicion that payments were made based on fictitious invoices to various legal entities which then further transferred the funds, based on fictitious business cooperation, to bank accounts of individuals and sole traders, following which the funds were withdrawn in cash.

Moreover, transactions were also identified as being part of misuse of individuals’ personal accounts for business purposes, with the aim of concealing tax liabilities.

Suspicious activities related to ungrounded refund of company founder’s liquidity loans are stil present, but to a significantly lesser extent.

That the APML has been able to identify potential tax evasion is supported by the fact that in 2023, the Tax Administration identified irregularities, in a follow-up to APML’s disseminations, which resulted in the Tax Administration establishing tax liabilities amounting to RSD 2.082.045.072,59 (approx. 17,258,737.00).

### Agency for the Prevention of Corruption

In 2023, the Agency for the Prevention of Corruption sent 4 requests to the APML involving suspected disproportion between the declared income and assets held by PEPs and their related persons.

### National Bank of Serbia

In 2023, the National Bank of Serbia (NBS) in line with an AML/CFT Cooperation Agreement signed between the NBS and APML, sent to the APML 48 requests for information on STRs sent in by obliged entities (number and quality of STRs and CTRs) and for a check of information about persons acquiring bank shares, as well as about persons intending to provide intermediary services in insurance business.

### Customs Administration

In 2023 Customs Administration sent 10 information disseminations to the APML, due to suspicion of money laundering. In the same period APML sent 20 requests for information to a relevant authority, which were based on information received from Customs Administration.

### Cooperation with foreign counterparts

In 2023, the APML responded to 114 requests for information received from foreign counterparts. The requests for information mainly involved Serbian citizens holding bank accounts abroad who were suspected to have links with criminal groups or criminal activities, or foreign citizens holding bank account in Serbian commercial banks or being involved in criminal activities in Serbia.

As part of work on its own cases, the APML sent 98 requests for information to foreign FIUs. The requests for information mainly involved non-residents with bank accounts or business activities in Serbia, whose origin of funds or business activities raised suspicion. In addition, a number of the requests were sent to foreign FIUs in order to identify assets of Serbian citizens abroad.

An overview of FIUs with which the APML exchanged most of the information in 2023 is shown in the table below:

|  |  |  |
| --- | --- | --- |
|  | **Requests by foreign FIUs** | **APML’s requests** |
| **North Macedonia** | 9 | 9 |
| **Bosnia and Herzegovina** | 11 | 3 |
| **Germany** | 9 | 4 |
| **Italy** | 4 | 5 |
| **Latvia** | 4 | 1 |
| **Malta** | 7 | 0 |
| **Montenegro** | 21 | 4 |
| **Russian Federation** | 3 | 10 |
| **Slovenia** | 6 | 2 |
| **Switzerland** | 5 | 2 |
| **United States of America** | 3 | 5 |

## TEAM FOR PREVENTION OF THE FINANCING OF TERRORISM (CFT TEAM)

The CFT Team preforms the following: analytical and operational tasks related to: receiving, recording and entering of reports into the database on a daily basis and of other information provided by the obliged entities from the AML/CFT Law, which are related to terrorism financing; making requests to the obliged entities, state authorities and foreign financial intelligence units; collecting and gathering data at the initiative of state authorities; responding to requests submitted by state authorities which relate to terrorism financing; recommending actions to obliged entities with regard to suspicious transaction reports; participating in national FT risk assessment.

In 2023, the CTF team in cooperation with other authorities, participated in the implementation of the relevant National AML/CFT Strategy Action Plan items. The Action Plan also includes pending items from the 2018 TF NRA Action Plan in order to ensure continuity of competent authorities’ activities, and the momentum generated during the 2018-2019 FATF ICRG process. The National AML/CFT Strategy (2020-2024) aims to protect fully the economy and financial system against the threat of money laundering, terrorism financing and proliferation of weapons of mass destruction, where the integrity of financial and non-financial sector is strengthened through public-private partnerships and risk based approach, and safety, security and rule of law are contributed to.

The CFT Team checked in 2023 all the suspicious entities in follow-up to the requests of other authorities, foreign counterparts and SARs, thereby succeeding in meeting the target set under Measure 4.1 of the AML/CFT Strategy Action Plan.

In addition to checking suspicious entities at the request of foreign counterparts, CFT Team members regularly updated the input for the purpose of FATF/RTMG ISIL, Al-Qaeda and Affiliates Financing Update, and participated at workshops organised by the EAG.

## STRATEGIC ANALYSIS BY SECTOR FOR ANALYSIS AND COUNTER TERRORIST FINANCING

For the purpose of analysing vulnerability of certain sectors to ML/TF and their effective mitigation, the Sector engaged in or developed the following strategic analysis activities, guidance and risk assessments:

* Update to the analysis regarding the purchase of secondary raw-materials and misuse of this sector for money laundering and for depleting funds from business bank accounts;
* Publication of suspicious transaction reporting recommendations;
* Regional money laundering and terrorist financing risk assessment of various forms of legal entities;
* ML/TF vulnerabilities of the gambling and betting sectors.

In addition, the Sector’s staff in 2023 were active in expert teams engaged in the following analysis work:

* Analysis of legislative framework, its application and current situation in the sectors identified as posing higher TF risk levels in line with the NRA findings;
* Analysis of threats in relation to the operations of e-money institutions from third countries.

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# SUPERVISION OF COMPLIANCE WITH AML/CFT LAW BY ACCOUNTANTS AND FACTORING FIRMS

Based of Article 104, paragraph 1, item 1 and Articles 105-108 of the AML/CFT Law, the APML in 2023 conducted off-site and on-site examinations of compliance with the AML/CFT Law by sole traders and legal entities engaging in the provision of accounting services and by factoring firms (obliged entities).

The APML also carried out offsite and onsite supervision of these obliged entities in 2023 with respect to their compliance with the Law on Freezing of Assets with the Aim of Preventing Terrorism and Proliferation of Weapons of Mass Destruction and onsite supervision for compliance with the Law on Central Records of Beneficial Owners.

Administration for the Prevention of Money Laundering

Supervisory activities

Risk assessment matrix

Offsite supervision

AML/CFT Questionnaire

LAF Questionnaire

Onsite supervision

On obliged entity premises

In addition, the APML in 2023 carried out an analysis of cross-border threats in obliged entities. More specifically, data was requested from obliged entities concerning the registered office of clients with which they were in a business relationship in 2022 (as on 31 December 2022), about the countries where their clients operated in the same period, information concerning the level risk they classified their clients as on 31 December 2022, based on Article 6 of the AML/CFT Law, information concerning client organisation form, and whether the client ownership structures included any trusts in the same period.

## Offsite supervision

The APML carries out off-site examinations by sending out questionnaires asking the supervised entities about their compliance with AML/CFT requirements and questionnaires about compliance with the LAF.

The questions in the AML/CFT questionnaire are divided in seven sections: general information on the obliged entity, obliged entity activities, information about obliged entity’s clients, reporting to the APML, ML actions and measures taken, TF actions and measures taken, and other measures by the obliged entity. The questions in the LAF questionnaire are divided in two sections - general information on the obliged entity and activities of the obliged entity.

In the case of sole traders (entrepreneurs) and legal persons engaging in accounting services, the criteria based on which the APML identifies the obliged entities to which it will send the AML/CFT Questionnaire include the number of employees and net profit of the legal person/entrepreneur. When it comes to factoring companies, the AML/CFT questionnaire is sent out to all registered factoring companies that have available the details in the questionnaire.

The total number of sole traders (entrepreneurs) and legal entities providing accounting services in Serbia who are included in the Register of Accounting Service Providers (kept by the SBRA) in 2023 exceeded 5500, and the total number of factoring companies as on 31 December 2023 was 22.

315 sole traders (entrepreneurs) and legal entities providing accounting services were covered by offsite supervision in 2023. Offsite examinations were completed in all 315 supervised accountants.

In 2023, the APML also started and completed offsite examination of 17 auditing companies that provide accounting services in addition to auditing, including examination 17 factoring companies.

## Preventive activity

The purpose of this form of supervisory action is to raise awareness with the obliged entities and highlighting the significant role that they play in the AML/CFT system.

As part of the preventive supervisory action, APML in 2023 disseminated 484 guidelines to newly established sole traders and legal entities engaging in accounting services and four newly established factoring companies so that they may learn more about their obligations under the AML/CFT Law and those laid down in the LAF, and related bylaws.

These guidelines instructed the obliged entities as to where on the APML website they can find laws and bylaws, and the accountants were instructed how to access the Guidebook for complying with the AML/CFT Law for accountants, which also includes model internal rules and procedures (acts).

## Onsite supervision

Onsite supervision is conducted by inspecting general and individual acts, records and documentation, as well as business books, extracts from accounts, correspondence and other documents on the premises of the supervised entity or those of the legal entity directly or indirectly related to the supervised entity, by taking statements from the responsible person or other supervised entity’s employees, as well as by requesting information from state authorities and holders of public authority and inspecting documentation.

Risk-based approach was applied in the development of the 2023 Onsite Inspection Plan; this approach means that the obliged entities that are assessed as having a higher ML/TF risk exposure in the performance of their registered business will be prioritised accordingly in the Onsite Inspection Plan timetable.

The following elements were used as criteria for assessing ML/TF risk exposure:

1) ML/TF NRA findings;

2) Offsite inspection findings - in case that they indicate compliance issues (irregularities)

;

3) Number of employees at the obliged entity;

4) Obliged entity’s annual income;

5) Information received by the APML from other state authorities and anonymous persons;

6) Information obtained from APML’s databases.

## Onsite examinations conducted

In 2023, the APML carried out onsite examination of 44 supervised entities, including 43 accountants (27 legal entities and 16 sole traders) and 1 factoring firm.

The 39 regular onsite AML/CFT examinations of accountants completed in 2023 found irregularities, including 220 economic offences and 139 misdemeanours (minor offences). Three legal entities providing accounting services were found with no irregularities. One supervised factoring company was found with 6 irregularities.

The overall number of irregularities found in AML/CFT onsite examinations in 42 accountants is 359 (as shown in the table below).

In 2023, a total of 15 economic offence reports were filed against legal entities engaging in accounting services and 14 requests for misdemeanour proceedings against sole traders (entrepreneurs) engaging in accounting services concerning the irregularities found in 2023 vis-a-vis the onsite AML/CFT-related examinations carried out in 2022 and 2023.

Also, the onsite examinations found that seven supervised obliged entities, i.e. accountants, did not have a license and were not registered in the Register of Accounting Service Providers. A criminal complaint was filed to the competent public prosecutor's office against one obliged entity in 2023, and criminal complaints will be filed against the other obliged entities in 2024, due to reasonable suspicion that they have committed the criminal offense under Article 353 of the Criminal Code, i.e. unauthorized engagement in a specific business activity.

## Onsite supervision of compliance with the Law on Centralized Records of BOs

In 2023, a total of 24 extraordinary onsite examinations were carried out of legal entities engaged in the provision of accounting services, and 6 requests for misdemeanour proceedings were filed against legal entities engaged in the provision of accounting services with respect to 7 violations of the LCRBO found.

## Onsite supervision of compliance with the LAF

In 2023, there were a total of 31 onsite examinations of obliged entities engaged in the provision of accounting services, where a total of 22 irregularities were found, i.e. the supervised obliged entities failed to establish whether they had any business or other similar relationships with the designated person. Out of the total number, 14 irregularities were found in supervised legal entities, and 8 in sole traders (entrepreneurs). Appropriate proceedings were instituted concerning the irregularities found. There are still no court decisions with respect to the irregularities found.

## Court Decisions

In 2023, 17 final court decisions were shared with the APML, in relation to proceedings against legal entities engaged in the provision of accounting services and responsible persons in them, and against entrepreneurs engaged in the provision of accounting services, in relation to the AML/CFT Law, of which 8 court decisions related to legal persons, and 9 on entrepreneurs. Legal entities were fined a total of RSD 1,585,000.00 while responsible persons in the legal entities were fined a total of RSD 318,000.00, and entrepreneurs were fined with a total of RSD 845,000.00. One final court decision is related to non-compliance with the Law on Centralised Records of BOs.

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# IT SUPPORT TO FIU CORE FUNCTIONS

IT staff, who organisationally belong to the *Section for financial and material, IT, personnel and general affairs*, performed tasks whose aim is to support smooth functioning of the internal APML IT systems and link the APML with other entities for a safe and fast data exchange, information and documentation.

Important segment of work is providing support to obliged entities in using the transaction reporting and document exchange applications, and managing user accounts. As part of this work, the IT staff ensures that all incoming documents are processed and imported into the APML IT system, and that transaction reports received from certain obliged entities are manually imported. A change was introduced with respect to obliged entities’ access to the system, i.e. digital certificates are no longer needed as the two-factor authentication was introduced, which greatly facilitated the entire process of accessing the APML's applications.

The IT staff continuously monitor, oversee and maintain APML’s entire IT system in an operational condition and continuously work to improve its performance. This includes improving the APML’s technical equipment and identifying the APML’s needs for IT equipment, which also includes planning of equipment disposal and purchasing of equipment for all staff, including new work stations, printers and other hardware, and their installation.

Further development of the new CTR and STR reporting application, i.e. TMIS 2 (Transaction Management Information System, ver. 2), which became operational on 01.01.2023, continued into 2023. The new application will make it easier for users to keep statistics on information included in CTRs and SARs. Also, the software application was upgraded in terms of better overview of data from the databases available to the APML.

IT staff supported other authorities’ efforts, e.g. the Working Group for the establishment of the criminal intelligence system for interagency information sharing.

# FATCA

The APML is the competent authority for the implementation of the Serbia - USA intergovernmental agreement on the implementation of FATCA (Foreign Account Tax Compliance Act).

In the course of 2023, APML communicated with the appropriate USA authorities and obliged entities to ensure appropriate application of this agreement. In this context, the staff administrated access rights to the application for receiving obliged entity notifications in line with FATCA agreement, under IRS specifications, support was provided and electronic filing of obliged entity reports through FATCA application was supported and monitored.

# INTERNAL ORGANISATION AND HUMAN RESOURCES

The Regulation (*Rulebook*) on APML’s internal organisation and systematisation of jobs has created the following:

**Sector for analysis and counter terrorist financing** as the main internal unit under which the following internal units are established:

* Section for STR analysis;
* Section for interagency cooperation
* Counter terrorist financing team
* Team for pre-analysis.

The APML has the following internal organisational units outside the Sector:

1. Team for legal affairs and harmonisation of legislation with international standards;
2. Team for international cooperation, training and projects;
3. Section for supervision
4. Section for material, financial, IT, HR and general affairs;
5. Team for the implementation of FATCA.

For tasks whose nature does not allow that they be classified in any internal unit, the jobs rulebook allows for one position (independent officer) outside of all internal units

In addition to the positions of the acting director and two acting assistant directors, who are appointed by the Government, the Rulebook on the internal organisation and classification of jobs in the APML, provides for 34 posts to be filled with 42 civil servants.

The number of envisaged operational staff positions (42) and the number of staff actually employed - 30 (27 indefinite term contracts + 3 appointed staff + 1 leave of absence), suggest that 71.42% of APML’s HR capacities was filled as at the end of 2023.

Of that number, 27 staff had a university degree, 1 a two-year post-secondary education, and 2 with a secondary-school qualification, which means that the qualification structure of the staff is at a high level, i.e. 90% of the staff had a university degree.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| ***Year*** | ***Number of employees*** | ***Qualification*** | | |
| *higher* | *2-year post-secondary* | *secondary* |
| 2023 | 30 (27 + 3 appointed persons) and one staff on leave | 27 | 1 | 2 |
|  |  |

The data above shows that the structure of the staff’s qualifications is at a high level and meets the needs of a financial intelligence unit, but it also shows the APML does not have sufficient human resources which is why in 2023 the APML recruited two additional staff under a temporary/part time contract and 2 staff members on additional work contract.

# GENERAL, MATERIAL AND FINANCIAL OPERATIONS

The 2023 Budget Law allocated a total of RSD 129 405 000 for APML operations to be financed by the Republic of Serbia budget. The level of execution of the current expenditure totals RSD 122,874,705.57 The use of the budget funds in 2023, in percentages, amounted at 94.95% even though the other appropriations do not show any major discrepancies between the funds allocated and those executed.

In 2023, the Section provided support for smooth operation of the APML in line with the AML/CFT Law by prioritising financial activities, planning expenditures, implementing the planned procurement of goods and services in line with the Public Procurement Law and by ongoing control of the compliance and legality of documentation supporting the budget execution.

In its business processes, the Section applies more than 40 laws, regulations, decisions, guidelines and other documents on which it regularly reports to the Ministry of Finance, Public Procurement Administration and other authorities.

For the execution of payment orders, exchange of financial data and following of statutory provisions related to public procurement, budget planning, HR management, etc. the APML’s financial staff use 15 specific software applications. The Section uses all active applications enabling direct connection between the APML and other authorities concerning materiel and financial affairs in line with the Budget Accounting Decree and international accounting standards for the public sector.

The Section staff were engaged in tasks such as drafting of general legal acts, specific employment-related acts, maintaining personnel records, entering of data in the Central Personnel Records and ISKRA-SAP system. In addition, the Section creates and keeps personnel, statistical and other records related to its remit of responsibility, and performs other operational and technical tasks ensuring efficiency and consistency of staff work, it conducts internal and public recruitment competitions, develops the Rulebook on the internal organisation and systematisation of jobs, and the Staffing Plan.

# 

# ANNEX 1: TRAINING EVENTS ATTENDED BY APML STAFF (AUDIENCE AND/OR PRESENTER(S))

|  |  |  |
| --- | --- | --- |
| **Training event title** | **Date and venue** | **Organiser** |
|  |  |  |
| 1. AML/CFT system | 22-24/2/2023, Niš | Judicial Academy, OSCE, US Embassy in Belgrade |
| 1. ML/TF risk assessment | 15/12/2022 – 24/2/2023, iSpring platform | FIU Russian Federation, International Training and Methodology Centre for Financial Monitoring |
| 1. Supervision of financial institutions | 15/12/2022 – 24/2/2023, iSpring platform | FIU Russian Federation, International Training and Methodology Centre for Financial Monitoring |
| 1. Info-seminar for presenting the new reporting form concerning the adequacy and functioning of the internal control system | 3.3.2023, online |  |
| 1. Sanctions and due diligence - Emerging global risk assessment frameworks | 28-30/3/2023, Zlatibor | US Embassy, Belgrade |
| 1. Asset recovery training | 26-28/4/2023, Rome, Italy | OSCE and Guardia di Finanza |
| 1. Meeting of strategic partners in the fight against illicit financial flows | 26/4/2023, Skopje, North Macedonia | GIZ, Ministry of Foreign Affairs of the Kingdom of Norway |
| 1. Inclusive and rights-based financial integrity | 26-27/4/2023, Skopje, North Macedonia | Balkan Civil Society Development Network (BCSDN) and European Centre for Not-for-Profit Law (ECNL) |
| 1. Organisation, competences, responsibilities and tasks of the APML (event as part of MA student training) | 27/4/2023, Belgrade | UCIPS |
| 1. VAT Fraud | 10-12/5/2023, Vršac | US Embassy, OPDAT |
| 1. Illicit financial flows - regional summer school | 15-18/5/2023, Durres, Albania | GIZ, Ministry of Foreign Affairs of the Kingdom of Norway |
| 1. FATF Introductory e-learning course | 8/5/2023, online | FATF |
| 1. FATF guidance, DNFBP supervision | 16-17/5/2023, online | GIZ |
| 1. Studies for knowledge innovation - compliance | 20/5/2023, Belgrade | Belgrade University Faculty of Law |
| 1. AML/CFT - FATF recommendations and immediate outcomes | 26/5/2023, Niš | GIZ |
| 1. FATF Standard Training Course | 29/5-2/6/2023, Busan, South Korea | FATF |
| 1. Workshop under the project to support Serbia in achieving the objectives of EU Negotiating Chapter 24 | 6-7.6.2023, Vrdnik | Ministry of Interior, IPA 2019 |
| 1. AML/CFT for DNFBPs - accountants, auditors, public notaries, lawyers, real estate agents, casinos and online games of chance operators | 29/5/2023, Belgrade | GIZ |
| 1. AML/CFT for DNFBP supervisors | 1/6/2023, Belgrade | GIZ |
| 1. AML/CFT for DNFBP supervisors - Guidelines for procedures for accountants and auditors | 2/6/2023, Belgrade | GIZ |
| 1. Training on ML/TF/WMDPF risk-based targeted border controls | 12-13/6/2023, Belgrade | AML/CFT Project in Serbia, implemented by Council of Europe |
| 1. Body language in public speaking | 2/8/2023, Belgrade | NAPA |
| 1. Personal data protection | 9/8/2023, Belgrade | NAPA |
| 1. Excel training | 10-11/9/2023, Belgrade | NAPA |
| 1. Public-private partnerships | 4-8/9/2023, Vienna, Austria | Joint Vienna Institute |
| 1. Training for Agency for the Prevention of Corruption on suspicious transaction reporting | 6/9/2023, Belgrade | AML/CFT Project in Serbia, implemented by Council of Europe |
| 1. Strengthening the role of private sector and FIs in identifying and preventing human trafficking | 7-8/9/2023, Sarajevo, BiH | OSCE and Council of Europe |
| 1. Fight against illegal trade in cultural goods in the OSCE area | 11-15/9/2023, Pula, Croatia | OSCE |
| 1. VAT Fraud | 18-20/9/2023, Zlatibor | US Embassy, OPDAT |
| 1. AML/CFT -   FATF recommendations and immediate outcomes | 4/10/2023, Appellate Court in Novi Sad | GIZ |
| 1. AML/CFT workshop for misdemeanour and commercial court prosecutors and judges | 5/10/2023 | GIZ |
| 1. AML/CFT workshop (TENTACLE project) | 9-13/10/2023, Sofia, Bulgaria | WCO |
| 1. Regional workshop on cooperation and information sharing in the framework of financial investigations and cybercrime investigations | 10-12/10/2023, Antalia, Turkiye | iProceeds Project |
| 1. Strategic HR management | 3, 6, 10 and 13/10/2023, Belgrade | NAPA |
| 1. Application of civil service management standards | 24/10/2023, Belgrade | NAPA |
| 1. Online training for obliged entities – factoring companies and accountants on compliance with AML/CFT standards in line with EU legislation | 24.10.2023, online | OSCE |
| 1. Use of the single information system for planning, monitoring of implementation, coordination of public policies and reporting | 26/10/2023, webinar | NAPA |
| 1. Foreign Exchange Operations | 26/10/2023, Belgrade | NAPA |
| 1. Online training for obliged entities – accountants, on compliance with AML/CFT standards in line with EU standards | 27/10/2023, online | OSCE |
| 1. Training on ICRG process | 30/10 - 3/11/2024, Paris, France | FATF |
| 1. Public administration project management according to European Commission methodology | 31/10/2023, Belgrade | NAPA |
| 1. Electronic office operations | 1/11/2023, online | NAPA |
| 1. Disrupting the Financing of Violent Extremism and other Criminal Acts based on Xenophobia, Racism and other forms of Intolerance, or in the name of Religion or Belief | 8 - 10/11/2023, Vienna, Austria | UNODC |
| 1. Prevention of sanction evasion | 9 - 10/11/2023, Belgrade | TAIEX |
| 1. Overview of i-Proceeds 2 activities | 15 - 16/11/2023, Belgrade | i-Proceeds 2 |
| 1. Whistle-blower protection - advanced level | 16 - 17/11/2023, webinar | NAPA |
| 1. Meeting of accounting professionals (Dani Racunovodja) | 17/11/2023, Vrnjačka Banja | SCCI |
| 1. **Improvement of supervisors’ capacities to meet their AML/CFT tasks - cooperation between supervisors and prosecutors’ offices** | 20/11/2023, Belgrade | OSCE |
| 1. **European semester for EU MS and cooperation with RS** | 27 - 28/11/2023, Belgrade | Ministry of European Integration |
| 1. Support to the Finance Ministry under public administration reform project | 27/11/2023, Belgrade, *Soft skills*  29 - 30/11/2023, Belgrade  Advanced Project Cycle Management | EU Delegation, KPMG, Finance Ministry |
| 1. Workshop for drafting an internal guidance for financial investigations | 29 - 30/11/2024, Vršac | GIZ |
| 1. Train the Trainers, FATF Standards Training Course | 27/11 – 2/12/2023, Busan, South Korea | FATF |
| 1. Non-profit organisations in the AML/CFT system in Serbia | 7 - 8/12/2023, Belgrade | GIZ |
| 1. Fundraising | 8.12.2023, webinar | NAPA |
| 1. Criminal misuse of cryptocurrency - WB/EU threats and responses | 12 - 13/12/2023, Budva, Montenegro | GIZ |
| 1. Advanced Excel training | 12 - 14/12/2023, Belgrade | NAPA |
| 1. Gender-sensitive and non-discriminatory language in public administration and media | 13/12/2023 | NAPA |
| 1. Octopus conference and closing meeting under i-Proceeds 2 | 13 - 15/12/2023, Bucharest, Romania | i-Proceeds 2 |
| 1. Corruption risk assessment | 14 - 15/12/2023, Belgrade | International anti-corruption agency, ACAS |

1. <https://www.pravno-informacioni-sistem.rs/SlGlasnikPortal/eli/rep/sgrs/vlada/odluka/2018/54/2/reg> [↑](#footnote-ref-1)
2. <https://www.pravno-informacioni-sistem.rs/SlGlasnikPortal/eli/rep/sgrs/vlada/drugiakt/2022/40/1> [↑](#footnote-ref-2)
3. <http://www.apml.gov.rs/pretraga-strucnih-misljenja> [↑](#footnote-ref-3)