



Multi-stakeholder co- operation in AML/CFT

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AML/CFT Multi-stakeholder co-operation

- Legal framework
- Institutional framework
- Inter-institutional (public to public) cooperation
- International Co-operation
- Public-Private Co-operation
- Practical Implementation
- Lessons learned



AML/CFT Multi-stakeholder co-operation

- Legal Framework
 - *Combating the Legalization of Crime Proceeds or other Property and Financing of Terrorism Act 2009*
 - *Combating the Legalization of Crime Proceeds or other Property and Financing of Terrorism Act (Enforcement) Decree 2009*



AML/CFT Multi-stakeholder co-operation

- Institutional Framework
- Key Institutions:
 - Financial Monitoring Service
 - Anticorruption Department

 - Central Bank of Azerbaijan
 - State Committee for Securities
 - Ministry of Finances
 - Ministry of National Security, etc.



AML/CFT Multi-stakeholder co-operation

- Inter-institutional cooperation (MoU based)
 - information exchange;
 - joint use of databases;
 - answering legal assistance inquiries;
 - joint researches, developing analytical and methodical materials;
 - joint development of by-laws;
 - organization of conferences, seminars and trainings.



AML/CFT Multi-stakeholder co-operation

- Inter-institutional cooperation
- MOU Examples
 - [Anti-Corruption Department](#)
 - [The Central Bank](#)
 - [State Committee for Securities](#)
 - [Ministry of Finance](#)
 - [Ministry of Communication and Information Technologies](#)
 - [Ministry of Justice](#)
 - [State Committee for the Work with Religious Organizations](#)
 - [Chamber of Auditors](#)
 - [State Customs Committee](#)
 - [Ministry of National Security](#)
 - [Ministry of Foreign Affairs](#)
 - [Ministry of Taxes](#)



AML/CFT Multi-stakeholder co-operation

- Inter-institutional cooperation
- MoU between the FMS (FIU) and the ACD
 - signed February 2010
 - sharing information on facts of legalization of criminally obtained funds or other property and investigation of such facts
 - jointly developed curriculum of training



AML/CFT Multi-stakeholder co-operation

- Inter-Institutional Training
- MoU CB and FMS
 - methodological assistance to credit institutions
 - training for employees
 - formation of internal control system in the credit institutions
 - identification of compliance officers
 - detection of suspicious transactions
 - submission of relevant information



AML/CFT Multi-stakeholder co-operation

- International Standards
 - FATF Standards
 - Basel Institute Principles
 - Wolfsberg Principles
- Cooperation with the international organizations specialized in the AML/CFT field:
 - MONEYVAL
 - FATF
 - Egmont Group



AML/CFT Multi-stakeholder co-operation

- International Cooperation co-operation with the international organizations supporting AML/CFT:
 - UNODC
 - IMF
 - OSCE
 - USAID



AML/CFT Multi-stakeholder co-operation

- Public-private cooperation
- Mobilization of the Private Sector
- Policy of minimum interference
- Building of dialogue and mutual trust:
 - equal partnership
 - voluntary involvement
 - sense of ownership
- Evolvement of contact points
- Multi-stakeholder training
- Foreign investment growth



AML/CFT Multi-stakeholder co-operation

- Public-private cooperation
- Joint FMS-ACD training for
 - Banks and other reporting agencies
 - Law enforcement bodies
 - Judges
- 19 trainings covering 130 people in 2012
- 2009-2012 – more than 1,000 employees of banks and credit institutions



AML/CFT Multi-stakeholder co-operation

- Practical implementation
 - Balanced oversight of the Central Bank
 - FMS full-fledged monitoring capacity
 - Power to seize transactions
 - Informal channels of consultations FMS-ACD
 - Secure Channels of communication
 - Feedback of the ACD on the results of investigation and adjudication
 - Submission of reports on the implementation of the international instruments



AML/CFT Multi-stakeholder co-operation

- Practical implementation
- Ad Hoc Group on ML
 - Improved criminalization in line with the international standards
 - Guidelines for the application of the Section developed
 - Reports on compliance with the international instruments drawn



AML/CFT Multi-stakeholder co-operation

- Lessons learned:
 - Measures shall be taken through concerted efforts
 - Each measure shall be designed in result-oriented fashion
 - Corporate interests shall not prevail
 - Contact person shall be assigned in each institution
 - Permanent Ad Hoc group operation necessary
 - Action Plan



AML/CFT Multi-stakeholder co-operation

Thank you for your attention