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The
 G8 Research Group
at the Munk School of Global Affairs at Trinity College in the University of Toronto
 presents the

2013 Lough Erne G8 Summit Interim Compliance Report

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8. Crime and Corruption: Anti-Money Laundering [95]

"We are committed to ensuring enforcement of our AML/CFT requirements to ensure corporate wrongdoers are held to account."

G8 Leaders Declaration on Crime and Corruption and Anti-Laundering

Assessment:

Country	Lack of Compliance	Work in Progress	Full Compliance
Canada		0	
France	-1		
Germany		0	
Italy	-1		
Japan		0	
Russia			+1
United Kingdom			+1
United States			+1
European Union			+1
Average Score		+0.22	

Background:

Crime and corruption has been one of the problems facing the G8 members in their attempts to promote economic growth and global stability.

The Financial Action Task Force was established in 1989 to "promote effective implementation of legal, regulatory and operational measures for combating money laundering, terrorist financing and other related threats to the integrity of the international financial system." ⁵⁰³

The IMF, which has been very active for over ten years in this area notes that Anti-Money Laundering/Combatting the Financing of Terrorism (AML/CFT) controls can "mitigate the adverse effects of criminal economic activity and promote integrity and stability in financial market." In a statement from Min Zhu, Deputy Managing Director of the IMF "Effective anti-money laundering and combating the financing of terrorism regimes are essential to protect the integrity of markets and of the global financial framework as they help mitigate the factors that facilitate financial abuse." G8 members have encouraged other world leaders to ensure their countries are meeting the AML/CFT requirements, including those of the FATF.

At the 2012 Camp David and 2013 Lough Erne Summits, G8 members continued to encourage other countries to ensure they meet the AML/CFT requirements.

⁵⁰³ "FATF: Home" Date of Access: 3 December 2013. http://www.fatf-gafi.org/pages/aboutus/

⁵⁰⁴ "International Monetary Fund: Anti-Money Laundering/Combatting the Financing of Terrorism" Date of Access: 3 December 2013. http://www.imf.org/external/np/leg/amlcft/eng/

⁵⁰⁵ "International Monetary Fund: Anti-Money Laundering/Combatting the Financing of Terrorism" Date of Access: 3 December 2013. http://www.imf.org/external/np/leg/amlcft/eng/

Commitment Features:

In 2012, FATF revised its 40 recommendations on developing international standards to combat money laundering and the financing of terrorism and proliferation. These recommendations form the basis for AML/CFT and thus G8 members must enforce all 40. They are divided into seven categories:

- 1. Polices and Coordination
- 2. Money Laundering and Confiscation
- 3. Terrorist Financing and Financing Proliferation
- 4. Preventive Measures
- 5. Transparency and Beneficial Ownership of Legal Persons and Arrangements
- 6. Powers and Responsibilities of Competent Authorities and Other Institutional Measures
- 7. International Cooperation⁵⁰⁷

In order to achieve full compliance each member state must undertake concrete policy initiatives in each category.

Scoring Guidelines:

-1	G8 member has not devised new policy initiatives in any of the FATF's seven categories.
0	G8 member has begun implementing new policy initiatives in some of the seven categories outlined by the FATF.
+1	G8 member has fully implemented new policy initiatives in each of the seven categories outlined by the FATF.

Lead Analyst: Christine Jacob

Canada: 0

Canada has partially complied with its commitment to support and encourage AML/CFT strategies in other countries.

On 18 June 2013, Prime Minister Stephen Harper released Canada's G8 action plan on transparency on corporations and trusts. He stated of Canada's awareness of this complex global issue and committed to focus on three key areas that have already been enforced. It includes: (1) domestic assessment of money laundering and terrorist financing; (2) improving "customer due diligence measures"; and (3) public consultation of beneficial ownership regarding corporate transparency in accordance with the Economic Action Plan 2013. Harper also acknowledged

 $gafi.org/topics/fatfrecommendations/documents/international standards on combating money laundering and the financing of terror is mproliferation-the fatfrecommendations. \\html$

 $^{^{506}}$ FATF International Standards on Combating Money Laundering and the Financing of Terrorism and Proliferation. Date of Access: 3 December 2013. http://www.fatf-

⁵⁰⁷ FATF International Standards on Combating Money Laundering and the Financing of Terrorism and Proliferation. Date of Access: 3 December 2013. http://www.fatf-

gafi.org/topics/fatfrecommendations/documents/internationalstandardsoncombatingmoneylaunderingandthe financingofterrorismproliferation-thefatfrecommendations.html

⁵⁰⁸ PM Releases Canada's G8 Action Plan on Transparency of Corporations and Trusts, Office of the Prime Minister (Enniskillen) 18 June 2013. Date of Access: 20 December 2013.

http://pm.gc.ca/eng/news/2013/06/18/pm-releases-canadas-g-8-action-plan-transparency-corporations-and-trusts#sthash. KjuZn8Lt.dpuf

the UK presidency for this focus and assured that Canada will continue to fulfill its responsibilities in this matter. 509

On 19 June 2013, Canada passed Bill S-14 "Fighting Foreign Corruption Act." This act will allow the Government of Canada, regardless of where crimes have taken place to exert authority over Canadian citizens, permanent residents, and Canadian companies.⁵¹⁰

On 5 July 2013, the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) addressed the Republic of Iran and the Republic of Korea's failure to prevent terrorist financing and money laundering. FINCTRAC has also advised of monitoring the transactions related to these countries, as well as other jurisdictions that represent similar risks. 512

Canada has taken steps to reaffirm its support of AML/CFT standards and encouraged countries to adhere to its standards. Therefore, Canada has been scored 0 for partial compliance.

Analyst: Saima Jahan

France: -1

France has not complied with its commitment to anti-money laundering.

France has not taken any significant actions towards implementing FATF recommendations, improving transparency or combating AML/CFT deficiencies in this compliance cycle.

Thus, France has been awarded a score of -1 for non-compliance.

Analyst: Sevda Sparks

Germany: 0

Germany has partially complied with its commitment to support and implement the FATF's standards and to encourage AML/CFT strategies in other countries.

On 17 August 2013 German Federal Financial Supervisory Authority (BaFin) began investigating Germany's largest bank, Deutsche bank. The goal of the investigation is to determine whether the bank must improve the preventative measures it has put in place against money laundering. 514

http://pm.gc.ca/eng/news/2013/06/18/pm-releases-canadas-g-8-action-plan-transparency-corporations-and-trusts#sthash. KjuZn8Lt.dpuf

⁵⁰⁹ PM Releases Canada's G8 Action Plan on Transparency of Corporations and Trusts, Office of the Prime Minister (Ottawa) 18 June 2013. Date of Access: 20 December 2013.

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⁵¹¹ FINTRAC Advisory, Financial Transactions and Reports Analysis Centre of Canada (Ottawa) 5 July 2013. Date of Access: 20 December 2013. http://www.fintrac-canafe.gc.ca/new-neuf/avs/2013-07-05-eng.asp

⁵¹²FINTRAC Advisory, Financial Transactions and reports Analysis Centre of Canada (Ottawa) 5 July 2013. Date of Access: 20 December 2013. http://www.fintrac-canafe.gc.ca/new-neuf/avs/2013-07-05-eng.asp

eng.asp ⁵¹³Regulator probes Deutsche Bank over money laundering controls: report, Reuters (New York) 17 August 2013. Date of Access: 22 December 2013. http://www.reuters.com/article/2013/08/17/us-deutschebank-bafin-laundering-idUSBRE97G05620130817.

On 4 December 2013 the Vatican's Financial Information Authority issued a press release stressing the importance of its agreement of understanding with Germany's Federal Criminal Police Office. This represents an effort by Germany to combat money-laundering operations in the state alongside increasing investments in Germany by the Vatican Bank.

Germany has partially complied with its commitment to anti-corruption and FATF standards. It has taken some action against combating money-laundering. Thus, Germany has been awarded a score of 0.

Analyst: Syed Fahd Ahmed

Italy: -1

Italy has not complied with its commitment to anti-money laundering.

Italy has not taken any significant actions towards implementing FATF recommendations, improving transparency or combating AML/CFT deficiencies in this compliance cycle.

Thus, Italy has been awarded a score of -1 for non-compliance.

Analyst: Sevda Sparks

Japan: 0

Japan has partially complied with its commitment to implement AML/CFT policies and encourage international participation.

Japan has signed Statements of Cooperation between Financial Intelligence Units with numerous countries on the topic of money laundering. This includes agreements signed with Slovenia on 14 June 2013, Turkmenistan on 12 September 2013, and Poland on 15 November 2013. 516

Japan has partially fulfilled its commitments to encourage effective international cooperation. Thus, Japan has received a score of 0.

Analyst: Sasha Boutilier

Russia: +1

Russia has fully complied with the commitment on the enforcement of the AML/CFT requirements.

On 28 June 2013, Russian President Vladimir Putin signed Federal Law on Amendments to Certain Legislative Acts of the Russian Federation regarding Prevention of Illegal Financial Operations. The law aims to ensure transparency of the beneficial ownership of companies and

⁵¹⁴Regulator probes Deutsche Bank over money laundering controls: report, Reuters (NewYork) 17 August 2013. Date of Access: 22 December 2013. http://www.reuters.com/article/2013/08/17/us-deutschebank-bafin-laundering-idUSBRE97G05620130817.

⁵¹⁵ Vatican finance group signs agreement with German counterpart, Catholic News Agency (Vatican City) 4 December 2013. Date of Access: 22 December 2013. http://www.catholicnewsagency.com/news/vatican-finance-group-signs-agreement-with-german-counterpart/.

⁵¹⁶Statements of cooperation between JAFIC and foreign FIUs concerning Exchange of Information related to Money Laundering and Terrorist Financing. Japan Financial Intelligence Center. Date of Access: 22 December 2013. http://www.npa.go.jp/sosikihanzai/jafic/en/kokusai_e/mousin_e.htm

⁵¹⁷ Introduction of amendments to certain legislation in order to prevent illegal financial operations, President of Russia 30 June 2013. Date of Access: 13 January 2014. http://kremlin.ru/news/18424.

legal arrangements, expands the list of financial operations and entities subject to mandatory control, and "makes it possible to block (freeze) non-cash monetary funds or non-certified securities and assets of physical persons and legal entities suspected of financing and engaging in terrorist activity." ⁵¹⁸

In September 2013, the Russian Federal Financial Monitoring Service published an Action Plan to enhance transparency and prevent misuse of companies and other legal entities. The action plan provides for taking legislative action to support implementation of Federal Law on Amendments to Certain Legislative Acts of the Russian Federation regarding Prevention of Illegal Financial Operations. The Federal Financial Monitoring Service mentioned that the Action Plan was adopted in accordance with the FATF Standards and the commitment made by the Russian Federation at the G8 Leaders summit.⁵¹⁹

Russia has started to implement the Action Plan. In particular, on 19 September 2013, the Russian Central Bank issued the guidelines on informing the regulator about measures to freeze (block) assets and about the results of identifying clients whose assets should be frozen (blocked) by commercial banks.⁵²⁰

On 29 October 2013, Russian President following the Russian-Ecuadorian talks stressed that the two countries would continue their cooperation in the area of combating terrorism financing, and money laundering. ⁵²¹

On 28 January 2014, Russia and the EU signed an agreement on combating terrorism aimed to strengthen bilateral cooperation in tackling terrorist financing, and enhance legal cooperation, including on "extradition and legal assistance on criminal cases,..identification, arrest, confiscation and return of property acquired through terrorist activities." To this end, the parties agreed to promote cooperation between the relevant Russian and EU authorities, including Eurojust and Europol. 522

On 10 February 2014, Russian Prime Minister Dmitry Medvedev instructed the Federal Customs Service to hold talks with the Fiscal Intelligence and Investigation Service of the Netherlands on the agreement on information cooperation in the area of combating money-laundering and the financing of terrorism during trans-border cash transfers by individuals. 523

Amendments to several laws in order to prevent illegal financial operations, President of Russia 30 June 2013. Date of Access: 24 February 2014. http://eng.kremlin.ru/news/5662.

⁵¹⁹ Action Plan to enhance transparency and prevent misuse of companies and other legal entities, Federal Financial Monitoring Service September 2013. Date of Access: 24 February 2014. http://www.fedsfm.ru/en/international-cooperation/action_plan.

⁵²⁰Bank of Russia Bulletin No. 62 (1458), Bank of Russia 14 November 2013. Date of Access: 24 February 2014. http://cbr.ru/publ/vestnik/ves131114062.pdf

⁵²¹ Press statement following Russian-Ecuadorian talks, President of Russia 29 October 2013. Date of Access: 24 February 2014. http://eng.kremlin.ru/transcripts/6187.

Joint EU-Russia statement on combatting terrorism, President of Russia 28 January 2014. Date of Access: 24 February 2014. http://eng.news.kremlin.ru/media/events/eng/files/41d4b9fc4bb11a050563.pdf. On the agreement on information cooperation in the area of combating money-laundering operations between the Russian Federal Customs Service and the Fiscal Intelligence and Investigation Service of the Kingdom of the Netherlands, Government of Russia 10 February 2014. Date of Access: 24 February 2014. http://government.ru/en/docs/10348

Russia has taken measures to amend its legislation in accordance with the 2012 FATF recommendations on AML/CFT and strengthened mutual legal assistance in the area on the bilateral level. Thus, it is awarded a score of +1.

Analyst: Andrey Shelepov

United Kingdom: +1

The United Kingdom has fully complied with its commitment to support and implement the policies and standards of the Financial Action Task Force (FATF) regarding anti-money laundering and counter-terrorist financing, and has also encouraged other countries to adhere to these standards.

On 9 August 2013, the United Kingdom's Financial Conduct Authority (FCA) fined the UK subsidiary of Nigeria's Guaranty Trust Bank EUR 525,000 for failing to have adequate controls to prevent money laundering. 524

On 31 October 2013, the FCA warned London city firms to strengthen their defenses against financial crime after it found serious failures in wealth and asset managers' anti-money laundering and corruption measures. 525

On 31 October 2013 the United Kingdom announced that a central register of companies' beneficial owners will be made accessible to the public. ⁵²⁶ The goal of the public registry is to allow for greater transparency and contribute to combating tax evasion. ⁵²⁷ Britain will be the first country to commit to an obligatory public register. ⁵²⁸

On 5 November 2013 the Government of the United Kingdom signed an automatic tax information sharing agreement with the Caymen Islands. The agreement will provide HM Revenue and Customs (HMRC) with financial information on UK taxpayers with accounts in the Cayman Islands. It is intended to help the HMRC ensure that the correct amount of tax is being paid by citizens with Cayman Island accounts and increase its ability to track tax evasion.

⁵²⁵City of London banks told to improve protection against money laundering, The Guardian (London) 31 October 2013. Date of Access: 20 December 2013 http://www.theguardian.com/business/2013/oct/31/banks-told-improve-protection-against-money-laundering.

⁵²⁶ Register of companies' beneficial owners will be made public, Cameron says, Pinsent Masons LLP (London) 4 November 2013. Date of Access: 20 December 2013. http://www.out-law.com/en/articles/2013/november/register-of-companies-beneficial-owners-will-be-made-public-cameron-says/. ⁵²⁷ UK: Government announces introduction of public register of companies' beneficial owners, Lexology (London), 1 November 2013. Date of Access: 20 December 2013.

http://www.lexology.com/library/detail.aspx?g=ec422c62-3249-4f95-98bb-47f300a0a307.

⁵²⁸ Register revealing firms' true owners will be open to public, says Cameron: The Guardian (London) 31 October 2013. Date of Access: 19 December 2013.

http://www.theguardian.com/business/2013/oct/31/public-register-firms-secret-owners-cameron.

⁵²⁹Cayman Islands signs tax information exchange agreement, HM Treasury (London) 5 November 2013. Date of Access: 20 December 2013. https://www.gov.uk/government/news/cayman-islands-signs-tax-information-exchange-agreement.

⁵³⁰ Cayman Islands signs tax information exchange agreement, HM Treasury (London) 5 November 2013. Date of Access: 20 December 2013. https://www.gov.uk/government/news/cayman-islands-signs-tax-information-exchange-agreement.

⁵²⁴ FCA Fines Nigerian Bank £525,000 over money-laundering controls, Reuters (NewYork) 9 August 2013. Date of Access: 20 December 2013. http://uk.reuters.com/article/2013/08/09/uk-gtbank-fine-idUKBRE9780RJ20130809.

On 9 December 2013, Foreign Secretary William Hague reaffirmed the United Kingdom's commitment to anti-laundering by stating "Reducing corruption and increasing transparency is at the heart of this Government's agenda." This statement reflects the principles of the FATF and displays the United Kingdom's continued support for FATF standards.

On 10 December 2013 the British Government announced that it will partner with the Government of Burma and the Burmese private sector to share expertise and training on international best practices in the fields of Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT).⁵³² The training will be provided in early 2014 by the UK organization, GovRisk. GovRisk and the British Embassy have met with key stakeholders in the fight against financial crime, including the Financial Intelligence Unit, the Central Bank, the Ministry of Finance, Office of the President, and with representatives from Burma's banking and insurance sectors.⁵³³ A five-day workshop for these stakeholders is planned to take place in February 2014.

Between 12 and 15 November 2013, the British Embassy funded workshops to train Cuban officials in strategies to tackle international financial crime. 534

The United Kingdom has expressed ongoing support for FATF standards and has taken action to combat money laundering. It has encouraged other countries to develop anti-money laundering and counter-terrorism financing measures and thus has been awarded a score of +1 for full compliance.

Analyst: Syed Fahd Ahmed

United States: +1

The United States has complied with its commitment to reaffirm continued support for the Financial Action Task Force (FATF) policies and its implementations in anti-corruption.

On 17 September 2013, the United States Financial Crimes Enforcement Network (FinCEN) published an advisory addressing FATF updates to the list of jurisdictions with "strategic AML/CFT deficiencies." In this advisory, FinCEN outlined "a broad range of restrictions and prohibitions" that U.S. financial institutions are subject to in Iran and the Democratic People's

https://www.gov.uk/government/world-location-news/reducing-corruption-and-increasing-transparency-are-vital-for-global-stability-and-prosperity.

⁵³¹ Reducing corruption and increasing transparency are vital for global stability and prosperity, British Embassy Hanoi (Hanoi) 9 December 2013. Date of Access: 20 December 2013.

⁵³² Burma: Cleaning up financial crime: British Embassy Rangoon (Rangoon) 10 December 2013. Date of Access: 20 December 2013. https://www.gov.uk/government/world-location-news/burma-cleaning-up-financial-crime.

⁵³³ Burma: Cleaning up financial crime: British Embassy Rangoon (Rangoon) 10 December 2013. Date of Access: 20 December 2013. https://www.gov.uk/government/world-location-news/burma-cleaning-up-financial-crime.

⁵³⁴The UK and Cuba work together on tackling money laundering: British Embassy Havana (Havana) 29 November 2013. Date of Access: 20 December 2013. https://www.gov.uk/government/world-location-news/el-reino-unido-y-cuba-unen-esfuerzos-en-la-lucha-contra-el-lavado-de-dinero-y-el-financiamiento-del-terrorismo.

⁵³⁵Advisory on the FATF-Identified Jurisdictions with AML/CFT Deficiencies, Financial Crimes Enforcement Network. Date of Access: 22 December 2013. http://www.fincen.gov/statutes_regs/guidance/pdf/FIN-2013-A006.pdf.

Republic of Korea.⁵³⁶ The advisory also encouraged U.S. financial institutions to "apply enhanced due diligence ...when maintaining correspondent accounts for foreign banks operating under a banking license issued by Ecuador, Ethipoia, Indonesia, Kenya, Myanmar, Pakistan, Sao Tome and Principe, Syria, Tanzania, Turkey, Vietnam, and Yemen"⁵³⁷ as FATF jurisdictions subject to enhanced due diligence.

On 24 October 2013, the United States and Mexico signed the "first-ever Memorandum of Understanding to exchange Financial Information to Thwart Drug Crime." The MOU facilitates information exchange for the purposes of anti-money laundering and AML/CTF missions.

The United States has fully complied with its commitment to reaffirm support for FATF policies and to its commitment to encourage countries to adhere to FATF corruption and transparency standards. Thus, the United States receives a score of +1 for full compliance.

Analyst: Sasha Boutilier

European Union: +1

The European Union has fully complied with its commitment to support and implement the Financial Action Task Force (FATF) standards and encourage anti-money laundering/counterterrorism financing (AML/CFT) strategies in other countries.

On 7 November 2013, the European Union-Thailand Partnership and Cooperation Agreement (PCA) was finalized in Brussels. This agreement is aimed towards strengthening mutual interests on global issues.⁵³⁹ On 15 November 2013, the Council of the European Union looked into the international account standards. The report has addressed three issues to be focused on. It includes (1) the adoption of International Financing Reporting Standards (IFRS); (2) any governance matters associated with the European Financial Reporting Advisory Group (EFRAG); and (3) funding issues in general.⁵⁴⁰ These are to be looked into in details and addressed again in forthcoming meetings.

In terms of bank resolution, the Council is also working towards a "Single Resolution Mechanism" (SRM) that will enter into force on January 2015.⁵⁴¹ In November, the ECB also

Advisory on the FATF-Identified Jurisdictions with AML/CFT Deficiencies, Financial Crimes Enforcement Network http://www.fincen.gov/statutes_regs/guidance/pdf/FIN-2013-A006.pdf.

http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/ecofin/139626.pdf.

⁵³⁶ Advisory on the FATF-Identified Jurisdictions with AML/CFT Deficiencies, Financial Crimes Enforcement Network. Date of Access: 22 December 2013.

http://www.fincen.gov/statutes_regs/guidance/pdf/FIN-2013-A006.pdf.

⁵³⁸U.S. and Mexican AML/CFT Supervisors Sign First-Ever MOU to Exchange Financial Information to Thwart Drug Crime, Financial Crimes Enforcement Network. Date of Access: 22 December 2013. http://www.fincen.gov/news_room/nr/html/20131024.html.

⁵³⁹ Press Release — European Union — Thailand Partnership and Cooperation Agreement initialed, European Union External Action (Brussels) 7 November 2013. Date of Access: 20 December 2013. http://eeas.europa.eu/statements/docs/2013/131107_02_en.pdf.

⁵⁴⁰Press Release — 3271st Council Meeting, Economic and Financial Affairs, Council of the European Union (Strasbourg) 15 November 2013. Date of Access: 20 December 2013.

http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/ecofin/139626.pdf.

⁵⁴¹Press Release — 3271st Council Meeting, Economic and Financial Affairs, Council of the European Union (Strasbourg) 15 November 2013. Date of Access: 20 December 2013.

prepared a draft document providing recommendations for the security of mobile payments.⁵⁴² The EU, along with its European Economic Area (EEA) member states are focusing on mobile transactions in order to monitor risks associated with frequent use of technology.⁵⁴³

On 6 December 2013, the Money Laundering and Terrorist Financing project (MOLI Serbia) organized a presentation at the National Assembly of the Republic of Serbia. It was organized by the Administration for the Prevention of Money Laundering (APML) for the Members of the EU Parliament.⁵⁴⁴ From 1 to 4 October 2013, it also made a four-day visit to Rome, Italy and organized a project on money laundering and terrorist financing.⁵⁴⁵

On 12 December 2013, the EU donated an amount of EUR 2.5 million towards a program that associates the Serbian Central Bank with the European System of Central Banks (ESCB). From 16 to 18 December 2013, Moli Serbia drafted the national AML/CFT strategy and action plan in Ruma, Serbia. This provided a direct outline of goals to be accomplished within 2014-2019. 547

The European Union has taken measures to reaffirm its support for FAFT standards and has encouraged other countries to adhere to its standard. For its full compliance, it has been awarded a score of 1+.

Analyst: Saima Jahan

http://www.ecb.europa.eu/press/pr/date/2013/html/pr131212.en.html

http://www.coe.int/t/DGHL/cooperation/economiccrime/corruption/Projects/MOLI Serbia/Default en.asp

⁵⁴² Recommendations for the Security of Mobile Payments, European Central Bank (Frankfurt) November 2013. Date of Access: 21 December 2013.

http://www.ecb.europa.eu/paym/cons/pdf/131120/recommendations for these curity of mobile payments draft pc 201311en.pdf.

Factorized Frankfurt Security of Mobile Payments, European Central Bank (Frankfurt) November 2013. Date of Access: 21 December 2013. http://www.ecb.europa.eu/paym/cons/pdf/131120/recommendationsforthesecurityofmobilepaymentsdraftpc201311en.pdf.

⁵⁴⁴ MOLI Serbia: Project against Money Laundering and Terrorist Financing in Serbia, Council of the European Union (Strasbourg) 6 December 2013. Date of Access: 20 December 2013.

http://www.coe.int/t/DGHL/cooperation/economiccrime/corruption/Projects/MOLI_Serbia/Default_en.asp. 545 MOLI Serbia: Project against Money Laundering and Terrorist Financing in Serbia, Council of the

European Union (Strasbourg) 6 December 2013. Date of Access: 20 December 2013.

http://www.coe.int/t/DGHL/cooperation/economiccrime/corruption/Projects/MOLI_Serbia/Default_en.asp. ⁵⁴⁶ Press release — EU, ECB and National Bank of Serbia complete extensive cooperation programme, European Central Bank (Frankfurt) 12 December 2013. Date of Access: 20 December 2013.

MOLI Serbia: Project against Money Laundering and Terrorist Financing in Serbia, Council of the European Union (Strasbourg) 16 to 18 December. Date of Access: 20 December 2013.