# Action Plan

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| **PP Document:** | Strategy against Money Laundering and the Financing of Terrorism (2020-2024) |
| **Action plan:** | Action Plan for implementing the Strategy against Money Laundering and the Financing of Terrorism (2020-2022) |
| **Coordination and reporting** | Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB) |
| **Umbrella PP Document:** | Strategy against Money Laundering and the Financing of Terrorism (2020-2024) |

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| **Overall objective:** **Fully protect the economy and financial system of the Republic of Serbia from the threat caused by money laundering and terrorism financing and financing of the proliferation of weapons of mass destruction, whereby the integrity of the financial and non-financial sector institutions is strengthened through public-private partnerships and risk based approach, and safety, security and rule of law are contributed to.** |
| Institution responsible for monitoring and control of implementation: Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB) |
| Indicator(s) at the level of overall objective (indicator of effect) | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2022 | Last year of AP validity |
| 1. **Assessment of technical compliance** of the AML/CFT and non-WMD proliferation system in Serbia with international (FATF) standards  | **1.** **Technical compliance assessment:** a) non-compliantb) partially compliantc) largely compliantd) compliant | **1.** MoneyVal Fifth Round **Mutual Evaluation Report** for Serbia  | **1.** **Technical compliance assessment:** From 2016 to 2019, Serbia achieved exceptional progress: Of the 40 FATF Recommendations, i.e. standards - with respect to 17 FATF Recommendation, Serbian was rated in 2016 as *non-compliant (1)* and *partially compliant (16)* (unsatisfactory assessments). Until 2019, these ratings were upgraded to *largely compliant* or *compliant* (satisfactory assessments) with respect to 13 out of the above 17 FATF Recommendations | **1.** **Technical compliance assessment:** 2019 | **1.** **Technical compliance assessment:** Satisfactory ratings for all 40 FATF Recommendations (i.e. *compliant* or *largely compliant*)  | **2022** |
| 2. **Assessment of effectiveness** of the AML/CFT and non-WMD proliferation system in Serbia with international (FATF) standards; | **2.** **Effectiveness assessment**a) low level of effectivenessb) moderate level of effectivenessc) substantial level of effectivenessd) high level of effectiveness | **2.** MoneyVal Fifth Round **Mutual Evaluation Report** for Serbia | **2.** **Effectiveness:** The base value was determined in 2016, partial assessment for the **strategic issues** (7 of 11 Immediate Outcomes under the FATF Methodology) was given by FATF in June 2019 finding that Serbia had demonstrated progress in the specific areas. | **2.** **Effectiveness:** 2016, 2019 | **2.** **Effectiveness**: positive and tangible impact on all 11 Immediate Outcomes under the FATF Methodology |  |
| 3. **Updated National Risk Assessment** | **3.** Yes/No | **3.** **Government Conclusion** on the adoption of the updated NRA report | **3.** **Updated National Risk Assessment:** No | **3.** **National Risk Assessment:** 2019 | **3.** **National Risk Assessment:** Yes. |  |

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| Specific objective 1: Mitigate money laundering, terrorism financing and proliferation of WMD risk through continuous improvement of the strategic, legislative and institutional framework, coordination and cooperation of all AML/CFT stakeholders and international cooperation |
| Institution responsible for monitoring and control of implementation: Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB) |
| Indicator(s) at the level of the specific objective (indicator of outcome) | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| 1. Updated National Risk Assessment | Yes/No | National Risk Assessment report Moneyval Report | No | 2019 | No | Yes. | Yes. |
| 2. Sustained progress on relevant immediate outcomes in line with FATF Methodology | Yes/No | Work reports of coordination bodies, supervisors, other institutionsMoneyval Report | Yes. | 2019 | Yes. | Yes. | Yes. |

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| Measure 1.1: Maintaining and improvement of comprehensive understanding of money laundering and terrorism financing risks in the Republic of Serbia |
| Institution responsible for monitoring and control of implementation: Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB) |
| Implementation period: 2020-2022 | Type of measure: Information and knowledge sharing |
| Indicator(s) at the level of measure (result indicator): | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| 1. National risk assessment updated and plan of activities to mitigate risks developed | Yes/No | National risk assessment report; Work plans, bulletins and annual reports; Supervisors’ reports; Training reports and reports about presentation of NRA findings | No | 2019 | No | Yes. | Yes. |
| 2. Plan of activities to mitigate risks in line with the updated NRA is implemented | Yes/No | Relevant activities incorporated in the national Action Plan; Work plans, bulletins and annual reports; Supervisors’ reports; Training reports and reports about presentation of NRA findings | No | 2019 | No | No | Yes. |

| **Activity title:** | **Authority implementing the activity** | **Partners in the implementation of the activity** | **Deadline for completion of activity** | **Source of financing** | **Link to programme budget** | **Total assessed financial resources by source in RSD 000**  |
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| **2020** | **2021** | **2022** |
| 1.1.1 Determining the methodology and updating of the ML/TF NRA  | AML/CFT CB | All AML/CFT stakeholders, as required | II quarter of 2021 | International donor funds (e.g. EU support to the prevention of ML and TF in Serbia, IPA 2015, OSCE) |  |  |  |  |
| 1.1.2. Prepare a plan of activities to mitigate risks established as a result of the activity under 1.1.1. | AML/CFT CB | All AML/CFT stakeholders, as required | II quarter of 2022 | Financed as part of regular activities of staffInternational donor funds (e.g. EU support to the prevention of ML and TF in Serbia, IPA 2015, OSCE) |  |  |  |  |
| 1.1.3 Presentation of NRA findings to all stakeholders and encouraging them to apply the appropriate findings and guidance in their work with the aim of mitigating the risks found | AML/CFT CB | Private sector (e.g. professional associations), non-profit sector | I quarter of 2022 | International donor funds (e.g. EU support to the prevention of ML and TF in Serbia, IPA 2015, OSCE)  |  |  |  |  |
| 1.1.4. Ensure that all institutions prioritise their work based on NRA findings  | AML/CFT CB | All AML/CFT stakeholders, as required | II quarter of 2021 - IV quarter 2022  | Financed as part of regular activities of staff |  |  |  |  |
| 1.1.5 Creation of a software application for statistical monitoring of ML and TF cases in line with the Guidelines establishing a consolidated methodology for reporting on and tracking of ML/TF cases, and its the launch of the application. | APML | SCC, RPPO, MoI, SIA, MoF-TA, MoF-CA, NBS, SC, MoJ-DMSCA | II quarter of 2020 | International donor funds (e.g. EU support to the prevention of ML and TF in Serbia, IPA 2015, OSCE)  |  |  |  |  |
| 1.1.6 Ensure that all relevant stakeholders use the software application for statistical monitoring of ML and TF cases envisaged in activity 1.1.4. | AML/CFT CB | RPPO, APML, MoI, etc. | IV quarter of 2020 | Financed as part of regular activities of staff |  |  |  |  |

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| Measure 1.2: Mitigation of the risks found and continuous identification of new threats and vulnerabilities |
| Institution responsible for monitoring and control of implementation: Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB) |
| Implementation period: 2020-2022 | Type of measure: Institutional-governance-organisational |
| Indicator(s) at the level of measure (result indicator): | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| Continuity sustained in reviewing threats and vulnerabilities, i.e. ongoing assessment of risk  | Yes/No | Report of the AML/CFT CB reviewing the number of analyses (e.g. threats, vulnerabilities); NRA Document | Yes. | 2019 | Yes.  | Yes. | Yes. |

| **Activity title:** | **Authority implementing the activity** | **Partners in the implementation of the activity** | **Deadline for completion of activity** | **Source of financing** | **Link to programme budget** | **Total assessed financial resources by source in RSD 000** |
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| **2020** | **2021** | **2022** |
| 1.2.1 Development of a plan of priority analyses to be made for the purpose of reviewing threats and vulnerabilities and setting out the methodology for the analyses, taking into account the findings of the NRA and other similar activities as required, such as the EU supranational risk assessment | APML | AML/CFT CB | I quarter of 2020 | Financed as part of regular activities of staff |  |  |  |  |
| 1.2.2 Development of the analyses under item 1.2.1 and presentation of the outcomes of such analyses in an appropriate format to stakeholders, as required.  | AML/CFT CB  | RPPO, MoI, APML, MoF-CA, Supervisory authorities, private sector partners (obliged entities and professional associations) | II quarter of 2020 - IV quarter 2020 | Financed as part of regular activities of staffInternational donor funds (e.g. EU support to the prevention of ML and TF in Serbia, IPA 2015, OSCE)  |  |  |  |  |
| 1.2.3 Analysis of frequent ML and TF patterns and trends, development of the trends and typologies analysis document and presentation of the results of these analysis in appropriate formats to all relevant stakeholders (Trends and Typologies document) | APML | AML/CFT CB, RPPO, MoI, APML, MoF-CA, Supervisory authorities, etc. | IV quarter of 2021 | Financed as part of regular activities of staffInternational donor funds (e.g. OSCE) |  |  |  |  |
| 1.2.4 Analysis and monitoring of risks by supervisors with respect to new products and technologies introduced in the financial and non-financial sectors | AML/CFT CB | Supervisory authorities, APML, MoI, RPPO, obliged entities | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 1.2.5 Establish a normative framework to govern in more detail virtual assets and virtual asset service providers, and additionally improve the current legal framework concerning mitigation of ML/TF risk in relation with these assets  | GoS | SC, NBS, MoF | IV quarter of 2020 | Financed as part of regular activities of staff |  |  |  |  |
| 1.2.6 Analyse threats in relation to operations of e-money institutions from third countries | NBS | APML, MoI, AML/CFT CB | December 2020 | Financed as part of regular activities of staff |  |  |  |  |
| 1.2.7 Work continuously and interactively with the private sector for a timely identification of new products and technologies that may be abused for ML or TF | APML | Supervisory authorities, AML/CFT CB, obliged entities, professional associations | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 1.2.8. Continuously inform AML/CFT authorities about new products and new technologies presenting ML or TF risk | APML | AML/CFT CB  | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 1.2.9. Analyse regulations in a proactive manner from the point of view of potential risks they might pose for the AML/CFT system | AML/CFT CB | Relevant institutions and bodies | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 1.2.10 Analyse the legal framework governing transportation of BNIs (AML/CFT Law, Law on FX Operations)  | APML | NBS, CA, MoI, competent court and prosecutor’s office | IV quarter of 2020 | Financed as part of regular activities of staff |  |  |  |  |
| 1.2.11. Amend the normative framework, as required, in accordance with the findings of the analysis under activity 1.2.10. | APML | National Bank of Serbia | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 1.2.12 Establish a Single register of remittance beneficiaries | National Bank of Serbia |  | II quarter of 2020 | Financed as part of regular activities of staff |  |  |  |  |
| 1.2.13 Periodically analyse the functionalities of the Single register of remittance beneficiaries and introduce new measures as appropriate. | National Bank of Serbia |  | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 1.2.14 Establish a Single register of safe-deposit boxes | National Bank of Serbia |  | II quarter of 2020 | Financed as part of regular activities of staff |  |  |  |  |
| 1.2.15 Continuously inform all relevant AML/CFT stakeholders about publicly available databases | AML/CFT CB |  | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 1.2.16 At least once a year, compare NRA findings and supervisors’ examination reports in order to assess the level of obliged entities’ understanding of risk  | AML/CFT CB | Supervisory authorities | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 1.2.17. Continuously review the quality of risk analyses conducted by obliged entities in line with Article 6 of the AML/CFT Law  | APML | Supervisory authorities | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |

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| Measure 1.3: Further development of coordination and cooperation mechanisms between the competent authorities for supervision, financial intelligence, ML/ TF investigation and prosecution, and asset recovery, and improvement of international cooperation  |
| Authority responsible for implementation (coordination of implementation) of the measure: Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB) |
| Implementation period: 2020-2022 | Type of measure: Institutional-governance-organisational |
| Indicator(s) at the level of measure (result indicator): | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| Progress in effectiveness and level of technical compliance with relevant international standards, annually | Yes/No | Moneyval report, Competent authorities’/Coordination body work reports | Yes. | 2019 | Yes. | Yes. | Yes. |

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| **Activity title:** | **Authority implementing the activity** | **Partners in the implementation of the activity** | **Deadline for completion of activity** | **Source of financing** | **Link to programme budget** | **Total assessed financial resources by source in RSD 000** |
| **2020** | **2021** | **2022** |
| 1.3.1 Consider possibilities for developing regional risk analyses and assessments, networking with public registers in other countries and other initiatives, in line with good international practices. | AML/CFT CB |  | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 1.3.2 Cooperate, including through collection of information on comparative practices in other countries, especially countries of the region, on issues relevant for the implementation of priority analyses and the NRA exercise | AML/CFT CB |  | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 1.3.3 Signature of information sharing MOUs between national supervisory authorities and foreign supervisors in the AML/CFT area | AML/CFT CB | Supervisory authorities | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 1.3.4 Enter into asset sharing agreements with other countries | MoJ |  | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 1.3.5 Review mechanisms for interagency cooperation and provide recommendations for its improvement | AML/CFT CB | Relevant bodies and institutions | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 1.3.6 Establishment of expert teams in line with the Rules of Procedure of the AML/CFT Coordination Body | AML/CFT CB | Relevant bodies and institutions | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 1.3.7 Improvement of knowledge and skills to use existing international cooperation mechanisms with the aim of identifying proceeds from crime | AML/CFT CB | Relevant bodies and institutions | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |

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| Measure 1.4: Ensure compliance of the AML/CFT legislative and institutional mechanisms in practice with international standards |
| Authority responsible for implementation (coordination of implementation) of the measure: Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB) |
| Implementation period: 2020-2022 | Type of measure: Institutional-governance-organisational |
| Indicator(s) at the level of measure (result indicator): | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| Overall assessment of technical compliance of the Serbian AML/CFT system with international standards  | *Largely compliant* (LC) or *compliant* (C) ratings | Progress reports by competent authorities and Moneyval  | NC (non-compliant) – 0PC (partially compliant) – 4LC (largely compliant)– 31C (compliant) – 5  | 2019 | NC – 0PC – 0LC/С - 40 | NC – 0PC – 0LC/С - 40 | NC – 0PC – 0LC/С - 40 |

| **Activity title:** | **Authority implementing the activity** | **Partner authorities in the implementation of the activity** | **Deadline for completion of activity** | **Source of financing** | **Link to programme budget** | **Total assessed financial resources by source in RSD 000** |
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| **2020** | **2021** | **2022** |
| 1.4.1 Monitoring the level of compliance with international standards in the area of fight against money laundering and terrorism financing  | AML/CFT CB | Relevant bodies and institutions | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 1.4.2 Initiating and supporting activities with the aim of implementing international recommendations | AML/CFT CB | Relevant bodies and institutions | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 1.4.3. Raising of awareness with all relevant stakeholders about FATF standards, guidelines and best practices | AML/CFT CB |  | IV quarter of 2022 | Financed as part of regular activities of staff International donor funds (e.g. EU support to the prevention of ML and TF in Serbia, IPA 2015, OSCE)  |  |  |  |  |
| 1.4.4 Regularly follow and analyse AML/CFT activities at the EU level  | AML/CFT CB | Relevant bodies and institutions | IV quarter of 2022 | Financed as part of regular activities of staff  |  |  |  |  |
| 1.4.5. Adopt measures as necessary in the Republic of Serbia, in accordance with analyses under item 1.4.4. | AML/CFT CB | Relevant bodies and institutions | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |

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| Specific objective 2: Prevent suspected proceeds from crime or funds intended for terrorism or proliferation of WMD, from entering the financial and non-financial sectors or improve their detection if already in the system |
| Institution responsible for monitoring and control of implementation: Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB) |
| Indicator(s) at the level of the specific objective (indicator of outcome) | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| Assessment of technical compliance with relevant international standards and recommendations  | *Largely compliant* (LC) or *compliant* (C) ratings | Progress reports by competent authorities and Moneyval  | NC – 0PC – 4LC – 31C – 5  | 2019 | NC – 0PC – 0LC/С - 40 | NC – 0PC – 0LC/С - 40 | NC – 0PC – 0LC/С - 40 |
| Progress on immediate outcomes 3, 4 and 6 under the FATF Methodology, annually | Yes/No | Progress reports by competent authorities and Moneyval  | Yes. | 2019 | Yes. | Yes. | Yes. |

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| Measure 2.1. Improvement of efficiency of monitoring and quality of suspicious activity reports submitted by the obliged entities to the APML |
| Institution responsible for monitoring and control of implementation: Administration for the Prevention of Money Laundering |
| Implementation period: 2020-2022 | Type of measure: Institutional-governance-organisational |
| Indicator(s) at the level of measure (result indicator): | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| Progress on immediate outcome 6 under the FATF Methodology, annually | Yes/No | Progress reports by competent authorities and Moneyval  | Yes. | 2019 | Yes. | Yes. | Yes. |

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| **Activity title:** | **Authority implementing the activity** | **Partners in the implementation of the activity** | **Deadline for completion of activity** | **Source of financing** | **Link to programme budget** | **Total assessed financial resources by source in RSD 000** |
| **2020** | **2021** | **2022** |
| 2.1.1. Adopt new or improve current recommendations for reporting suspicious activities (SARs) to the APML | APML  | Supervisory authorities, MoI, RPPO | December 2020 | Source 1 - EU Support to Prevention of Money Laundering in Serbia Project |  |  |  |  |
| Source 2 - OSCE Mission to Serbia |  |  |  |  |
| 2.1.2. Improve quality of feedback provided to obliged entities concerning their SARs | APML |  | IV quarter of 2022 (continuous activity) | Financed as part of regular activities of staff |  |  |  |  |
| 2.1.3. Introduction of the professional exam for compliance officers in line with the AML/CFT Law | APML | Supervisory authorities | October 2021 | Financed as part of regular activities of staff |  |  |  |  |
| 2.1.4. Develop a list of indicators for identifying persons and transactions with respect to which there are reasons for suspicion of money laundering or terrorism financing on the internet and cybercrime offences in the area provision of financial services, under the remit of responsibility of the NBS | National Bank of Serbia | APML | October 2020 | Financed as part of regular activities of staff |  |  |  |  |
| 2.1.5. Develop a list of indicators for identifying persons and transactions with respect to which there are reasons for suspicion of money laundering or terrorism financing on the internet and cybercrime offences in the area provision of financial services, under the remit of responsibility of the Securities Commission | SC | APML | IV quarter of 2021 | Financed as part of regular activities of staff |  |  |  |  |
| 2.1.6 Improvement of quality of suspicious activity reporting inline with risk analysis | APML | Supervisory authorities, law enforcement agencies, obliged entities, other institutions | IV quarter of 2022 (continuous activity) | Financed as part of regular activities of staff International donor funds (EU Support to Prevention of Money Laundering in Serbia Project) |  |  |  |  |

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| Measure 2.2: Prevention of abuse of the financial and non-financial sectors for money laundering, terrorist financing and proliferation of WMD through application of CDD by obliged entities |
| Authority responsible for implementation (coordination of implementation) of the measure: Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB) |
| Implementation period: 2020-2022 | Type of measure: Institutional/managerial/organisational |
| Indicator(s) at the level of measure (result indicator): | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| Improved system of registration of beneficial owners  | Yes/No | SBRA work report | No | 2019 | Yes. | Yes. | Yes. |
| Rulebook on the methodology to comply with the AML/CFT Law and taking into account NRA findings passed | Yes/No | Adoption of a Rulebook | No | 2019 | Yes. | Yes. | Yes. |
| Improvement of the system under this measure in line with the risks found, annually | Yes/No | Reports by competent institutions; Report of the Coordination Body | Yes. | 2019 | Yes. | Yes. | Yes. |

| **Activity title:** | **Authority implementing the activity** | **Partners in the implementation of the activity** | **Deadline for completion of activity** | **Source of financing** | **Link to programme budget** | **Total assessed financial resources by source in RSD 000** |
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| **2020** | **2021** | **2022** |
| 2.2.1 Amend the Law on Centralised Records of Beneficial Owners and allow the founders of Registered Entities that are being registered (established) electronically with the SBRA to submit an electronic application at the same time and thereby record their beneficial owner in the Centralised Records and develop/improve the software application accordingly. | MinEcon | Business Registers Agency | IV quarter of 2021 | Financing not secured; the source is known  |  | 11.800 |  |  |
| 2.2.2. Amend the Law on Centralised Records of Beneficial Owners to improve the content of the Centralised Records (introduce an obligation to record the Registered Entity’s beneficial owner on each of the basis; to upload the documents and ownership structure charts into the Centralised Records) and develop/improve the software application accordingly. | MinEcon | Business Registers Agency | IV quarter of 2022 | Financing not secured; the source is known |  |  | 17.700 |  |
| 2.2.3 Amendments to the Rulebook on the methodology to comply with the AML/CFT Law and NRA results, especially with respect to the application of simplified and enhanced CDD | MoF | Supervisory authorities  | April 2020 | Financed as part of regular activities of staff |  |  |  |  |
| 2.2.4. Draft regulations (ML/TF risk assessment guidelines and SAR indicators) for persons engaging in postal communications | MTTT - Team for supervision of postal communication | APML | April 2020 | Financed as part of regular activities of staff |  |  |  |  |
| 2.2.5. Develop or improve questionnaires on activities of obliged entities in relation to asset freezing with the aim to prevent terrorism and proliferation of weapons of mass destruction | APML | Supervisory authorities | IV quarter of 2022 (continuous activity) | Financed as part of regular activities of staff |  |  |  |  |
| 2.2.6. Conduct analyses of the methods and frequency of use of the data recorded in the Centralised Records of Beneficial Owners and their effectiveness for the operation of all AML/CFT stakeholders (obliged entities, APML, police, prosecutors, etc.) | AML/CFT CB | SBRA, supervisory authorities  | IV quarter of 2022 Continuous activity | Financed as part of regular activities of staff |  |  |  |  |
| 2.2.7. Take measures to improve situation in accordance the analyses under activity 2.2.6.  | AML/CFT CB | SBRA, supervisory authorities  | IV quarter of 2022 (continuous activity) | Financed as part of regular activities of staff |  |  |  |  |
| 2.2.8. Introduce an obligation for individuals who are part of the VAT system and who engage in construction of buildings (individual investors) to open a specific-purpose account and to conduct their business through this account; | MoF-TA | MoF | December 2020 | Financed as part of regular activities of staff |  |  |  |  |
| 2.2.9. Based on a needs assessment, provide information to identified groups of obliged entities, in appropriate formats, about their obligations under the AML/CFT Law and Law o Freezing of Assets with the Aim of Preventing Terrorism and Proliferation of WMD | APML | Professional Associations, Serbian Chamber of Commerce and Industry, MTTT, GCHA | May 2020 | International donor funds (EU Support to Prevention of Money Laundering in Serbia Project, OSCE Mission to Serbia) |  |  |  |  |
| 2.2.10. Monitoring of international standards in the area of new technologies and digital identities  | AML/CFT CB | National Bank of Serbia | IV quarter of 2022 (continuous activity) | Financed as part of regular activities of staff |  |  |  |  |

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| Measure 2.3. Improve the operation of AML/CFT supervisors in line with the risks found in the NRA |
| Institution responsible for monitoring and control of implementation: Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB) |
| Implementation period: 2020-2022 | Type of measure: Institutional/managerial/organisational |
| Indicator(s) at the level of measure (result indicator): | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| Continuity and implementation of RBA sustained and improved | Yes/No | Supervisors’ reports; Moneyval report | Yes. | 2019 | Yes. | Yes. | Yes. |

| **Activity title:** | **Authority implementing the activity** | **Partners in the implementation of the activity** | **Deadline for completion of activity** | **Source of financing** | **Link to programme budget** | **Total assessed financial resources by source in RSD 000**  |
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| **2020** | **2021** | **2022** |
| 2.3.1. Improve the supervision methodology in line with the updated National Risk Assessment findings | AML/CFT CB | Supervisory authorities  | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 2.3.2. Ensure consistency between supervisors’ regulations (i.e. ML/TF risk assessment guidelines) and the amended AML/CFT Law | AML/CFT CB | Supervisory authorities  | April 2020 | Financed as part of regular activities of staff  |  |  |  |  |
| 2.3.3. Develop a work methodology and risk matrices for entities engaged in postal communication | MTT - Team for supervision of postal communication | APML | June 2020 | Financed as part of regular activities of staff |  |  |  |  |
| 2.3.4. Develop or improve, as appropriate, lists of indicators for recognising suspicious activities to be used by obliged entities | APML | Supervisory authorities  | IV quarter of 2022 (continuous activity) | Financed as part of regular activities of staff |  |  |  |  |
| 2.3.5. Analyse capacities (staffing, technical, financial) of relevant institutions and ensure professional development of staff of various AML/CFT institutions (with respect to the AML/CFT Law, Law on Freezing of Assets with the Aim of Preventing Terrorism and Proliferation of WMD) | AML/CFT CB | Line ministries and supervisors | IV quarter of 2021  | Financed as part of regular activities of staff |  |  |  |  |
| 2.3.6 Improve capacities of supervisory authorities, as appropriate, in accordance with the findings of the analysis under activity 2.3.5. | GoS | Supervisory authorities | IV quarter of 2022  | According to the analysis |  |  |  |  |
| 2.3.7. Ensure that the all sectors adopt RBA in supervision taking into account the sectoral risk profile identified in the updated NRA, including in onsite and offsite examinations | AML/CFT CB  | Supervisory authorities  | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 2.3.8. Professional training of supervisors’ staff about the provisions of the AML/CFT Law and Law on Freezing of Assets with the Aim of Preventing Terrorism and Proliferation of WMD | APML | CCIS, JASupervisory authorities  | IV quarter of 2022 (continuous activity) | International donor funds (EU Support to Prevention of Money Laundering in Serbia Project, OSCE Mission to Serbia) |  |  |  |  |
| 2.3.9. Improve capacities of misdemeanour and commercial courts through training of misdemeanour and commercial courts judges about the application of the AML/CFT Law | APML | SCC, HJC, AMC, AC, International partners, supervisory authorities  | IV quarter of 2022 (continuous activity) | International donor funds (EU Support to Prevention of Money Laundering in Serbia Project, OSCE Mission to Serbia) |  |  |  |  |
| 2.3.10. Improve supervisors’ knowledge of financial products that may be abused for money laundering or terrorist financing purposes through training (capital market, negotiable instruments, FX operations, etc.) | AML/CFT CB | RPPO, MoI, MoF-TA, MoF-CA, supervisory authorities  | IV quarter of 2022 (continuous activity) | International donor funds (EU Support to Prevention of Money Laundering in Serbia Project, OSCE Mission to Serbia) |  |  |  |  |
| 2.3.11. Improve the capacities of authorities, through training, to better recognise ML/TF risks when controlling cross-border transportation of cash | MoF-CA | , APML, MoI, prosecutor’s office, CommC and MC | IV quarter of 2022 (continuous activity) | Financed as part of regular activities of staff |  |  |  |  |
| 2.3.12. Improve the capacities of the Customs Administration to actually recognise dual-use goods, arms and military equipment through training of customs officers | MoF-CA | APML | IV quarter of 2022 (continuous activity) | Financed as part of regular activities of staff |  |  |  |  |

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| Specific objective 3: Sanction money launderers in an efficient and effective manner and confiscate proceeds from crime |
| Institution responsible for monitoring and control of implementation: Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB) |
| Indicator(s) at the level of the specific objective (indicator of outcome) | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| Progress sustained on immediate outcome 7 under the FATF Methodology, annually | Yes/No | Reports by competent authorities; Moneyval report | Yes. | 2019 | Yes. | Yes. | Yes. |
| Improved situation with respect to immediate outcome 8 under the FATF Methodology, annually | Yes/No | Reports by competent authorities; Moneyval report | - | 2016 | Yes. | Yes. | Yes. |

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| Measure 3.1: Improvement of effectiveness of state authorities competent for detecting, prosecuting and trying money laundering offences in line with the results of the NRA and recommendations by Moneyval in course of the evaluation process of the Republic of Serbia |
| Institution responsible for monitoring and control of implementation: Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB) |
| Implementation period: 2020-2022 | Type of measure: Institutional/managerial/organisational |
| Indicator(s) at the level of measure (result indicator): | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| Progress on immediate outcome 6 under the FATF Methodology, annually | Yes/No | Progress reports by competent authorities; Moneyval report | Yes. | 2019 | Yes. | Yes. | Yes. |
| Progress on immediate outcome 7 under the FATF Methodology, annually | Yes/No | Progress reports by competent authorities; Moneyval report | Yes. | 2019 | Yes. | Yes. | Yes. |

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| **Activity title:** | **Authority implementing the activity** | **Partners in the implementation of the activity** | **Deadline for completion of activity** | **Source of financing** | **Link to programme budget** | **Total assessed financial resources by source in RSD 000**  |
| **2020** | **2021** | **2022** |
| 3.1.1. Analyse current cooperation agreements between RPPO and other authorities concerning the exchange of data and information in relation to ML for the purpose of efficient detection and prosecution of the criminal offence of money laundering  | RPPO | MoF-TA-TPol, MoF-CA, NBS, APML, SBRA, CSD, SAI, RGA, ACAS, NPDIF, NHIF, RSPD, PPA | IV quarter of 2020 | Financed as part of regular activities of staff |  |  |  |  |
| 3.1.2. Enter into new or amend current cooperation agreements, as appropriate, in accordance with the findings of the analysis under 3.1.1  | RPPO | MoF-TA-TPol, MoF-CA, NBS, APML, SBRA, CSD, SAI, RGA, ACAS, NPDIF, NHIF, RSPD, PPA | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 3.1.3. Prioritisation of money laundering cases in annual plans and programmes of the Prosecutor’s Office for Organised Crime and Higher Public Prosecutors’ Offices of Belgrade, Kraljevo, Nis and Novi Sad, and Higher Court of Belgrade, Kraljevo, Nis and Novi Sad, and Supreme Court of Cassation and Appellate Courts, especially in cases where predicate crimes involve the high-risk and high-value criminal offences | RPPO | POOC, HPPOs of Kraljevo, Belgrade, Nis, Novi Sad; SCC; AC  | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 3.1.4. Establishment of permanent task forces to prosecute stand-alone money laundering and third-party money laundering in four special departments of higher public prosecutors’ offices of Belgrade, Kraljevo, Nis and Novi Sad; and in the Prosecutor’s Office for Organised Crime for professional money laundering. | POOC | HPPOs of Kraljevo, Belgrade, Nis, Novi Sad; MoF-TA-TPol, MoF-CA, NBS, APML, SBRA, CSD, SAI, RGA, ACAS, NPDIF, NHIF, RSPD and PPARHIF | IV quarter of 2020 | Financed as part of regular activities of staff |  |  |  |  |
| 3.1.5. Hold periodic meetings to coordinate and prioritise activities of supervisors and competent police units nad public prosecutors’ offices in responsible for prosecuting the ML criminal offences | RPPO | POOC; HPPOs of Kraljevo, Belgrade, Nis, Novi Sad; MoI and supervisors | IV quarter of 2021 | Financed as part of regular activities of staff |  |  |  |  |
| 3.1.6. Continuous workshops to improve public prosecutors’ skills for a proactive approach in starting parallel financial investigations and criminal investigations in money laundering proceedings (esp. stand-alone and third-party money laundering).  | JA | RPPO; SCC; MoI | II quarter of 2020 - IV quarter 2021 | International donor funds |  |  |  |  |
| 3.1.7 Continuous delivery of advanced training and workshops on financial investigations, use of financial intelligence, analysis of financial flows and criminal organisation financial flow modeling, analysis of net value of assets, proving of the money laundering intention, stand-alone ML investigations | JA | RPPO; SCC; MoI | IV quarter of 2022 | International donor funds |  |  |  |  |
| 3.1.8 Continuous training of prosecutors and judges about the relevance of circumstantial evidence - analysis and inferences based on circumstantial evidence; decision-making on admissibility of evidence at the preparatory hearing; assessment of forensic evidence  | JA  | RPPO and SCC; MoI | IV quarter of 2022 | International donor funds |  |  |  |  |
| 3.1.9 Continuous delivery of training for prosecuting legal entities as perpetrators of the criminal offence of money laundering  | JA  | RPPO; SCC; MoI | IV quarter of 2022 | Financing partially secured in the Project of EU support to prevention of money laundering and terrorism financing in Serbia International donor funds |  |  |  |  |
| 3.1.10 Assessment of HR capacities of the POOC and special anti-corruption departments, HPPOs and HCs and adoption of a new Rulebook on Classification of Jobs in accordance with the assessment | MoJ | POOC and special anti-corruption departments, HPPOs and HCs | IV quarter of 2020 | Financed as part of regular activities of staff |  |  |  |  |
| 3.1.11 Recruitment of vacancies in line with the Rulebook on Classification of Jobs of the POOC and special anti-corruption departments, HPPOs and HCs | MoJ | POOC and special anti-corruption departments, HPPOs and HCs | IV quarter of 2022 | RS Budget  |  |  |  |  |

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| Measure 3.2: Imposing effective and deterring criminal sanctions  |
| Institution responsible for monitoring and control of implementation: SCC |
| Implementation period: 2020-2022 | Type of measure: Information and knowledge sharing |
| Indicator(s) at the level of measure (result indicator): | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| Progress in meeting the requirements of international standards related to the imposition of effective, proportionate and deterring sanctions for money laundering, annually | Yes/No | Progress reports by competent authorities; Moneyval report | Yes. | 2019 | Yes. | Yes. | Yes. |

| **Activity title:** | **Authority implementing the activity** | **Partners in the implementation of the activity** | **Deadline for completion of activity** | **Source of financing** | **Link to programme budget** | **Total assessed financial resources by source in RSD 000** |
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| **2019** | **2020** | **2021** |
| 3.2.1. Continuous basic and advanced training of judges for effective handling of main hearings, imposition of effective criminal sanctions in money laundering proceedings  | JA | SCC | IV quarter of 2022 | International donor funds |  |  |  |  |
| 3.2.2. Analysis of comparative case law concerning sanctioning for the ML criminal offences | SCC  | AC, CLI | IV quarter of 2020 | International donor funds |  |  |  |  |
| 3.2.3. Exchange of experiences at the international level, among other things through study visits of competent LEAs to countries with good track record of prosecuting ML cases | SCC  | RPPO, POOC; HPPO’s of Kraljevo, Belgrade, Nis, Novi Sad; MoF-CA; MoI; ACAS; MoF-TA; APML | IV quarter of 2022  | International donor funds |  |  |  |  |
| 3.2.4. Prepare quarterly analyses of the domestic case law concerning the prosecution of the ML crime - publishing of bulletins and professional publications concerning proceedings and court decisions for money laundering, especially court decisions that can be considered precedents  | SCC | HC; ACs of Kraljevo, Belgrade, Nis, Novi Sad | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |

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| Measure 3.3: Effective seizure/confiscation of proceeds from crime |
| Institution responsible for monitoring and control of implementation: Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB) |
| Implementation period: 2020-2022 | Type of measure: Information and knowledge sharing |
| Indicator(s) at the level of measure (result indicator): | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| All planned training events delivered | Yes/No | Reports by competent authorities concerning the progress made in meeting Moneyval recommendations; Moneyval report | Yes. | 2016 | Yes. | Yes. | Yes. |

| **Activity title:** | **Authority implementing the activity** | **Partner authorities in the implementation of the activity** | **Deadline for completion of activity** | **Source of financing** | **Link to programme budget** | **Total assessed financial resources by source in RSD 000** |
| --- | --- | --- | --- | --- | --- | --- |
| **2020** | **2021** | **2022** |
| 3.3.1. Continuous joint training of police officers and public prosecutors for more efficient identification of proceeds from crime and property with uncertain origin. | POLA  | JA; RPPO; MoI | IV quarter of 2022 | Financed as part of regular activities of staffInternational donor funds |  |  |  |  |
| 3.3.2. Development of a manual on identifying and confiscating proceeds from crime and running of (parallel) financial investigations. | RPPO | SCC | IV quarter of 2020 | International donor funds |  |  |  |  |
| 3.3.3. Continuous joint training of APML, police and public prosecutors for tracing and confiscating illicit proceeds located abroad by using the instruments of international cooperation, especially ARO office, CAMDEN network and Egmont Group.  | JA | RPPO, MoI, APML; POOC; HPPO’s of Kraljevo, Belgrade, Nis, Novi Sad | IV quarter of 2022 | Financed as part of regular activities of staffInternational donor funds |  |  |  |  |
| 3.3.4 Strengthening capacities of the Directorate for Management of Seized/Confiscated Assets by recruiting an appraiser | MoJ-DMSCA | GoS | IV quarter of 2020 | Republic of Serbia budget |  |  | Budget of the Directorate for Management of Seized/Confiscated Assets - RSD 960.000 per year, as of 2021 - gross salary NOTE: Assessment made based on the value of an average salary in Serbia |  |
| 3.3.5 Regular delivery of training for assessment and security of the value of proceeds from crime until the final court decision  | JA | RPPO; POOC; MoJ-DMSCA; MoJ  | IV quarter of 2022 | Financed as part of regular activities of staffInternational donor funds |  |  |  |  |
| 3.3.6 Analysis of the legal framework for seizure and confiscation of proceeds from crime in criminal proceedings and in proceedings for seizure/confiscation of proceeds from crime, and especially its compliance with FATF recommendations | MoJ | RPPO, Supreme Court of Cassation, Prosecutor’s Office for Organised Crime | IV quarter of 2022  | Financed as part of regular activities of staff |  |  |  |  |

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| Specific objective 4: Detect and eliminate terrorism financing threats and sanction terrorist financiers |
| Institution responsible for monitoring and control of implementation: Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT Coordination Body) |
| Indicator(s) at the level of the specific objective (indicator of outcome) | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| Progress in achieving immediate outcomes 9-11 under FATF Methodology | Yes/No | Reports by competent authorities;Moneyval Report | Yes. | 2019 | Yes. | Yes. | Yes. |

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| Measure 4.1: Ensure sustainability of the system of research and criminal prosecution in terrorism financing cases |
| Institution responsible for monitoring and control of implementation: Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB) |
| Implementation period: 2020-2022 | Type of measure: Institutional/managerial/organisational |
| Indicator(s) at the level of measure (result indicator): | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| Suspicious entities checked  | Percentage | Annual reports of competent state authorities | 100% | 2019 | 100% | 100% | 100% |

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| **Activity title:** | **Authority implementing the activity** | **Partners in the implementation of the activity** | **Deadline for completion of activity** | **Source of financing** | **Link to programme budget** | **Total assessed financial resources by source in RSD 000** |
| **2020** | **2021** | **2022** |
| 4.1.1. Continue sharing data and information on terrorist financing within the existing structures of interagency coordination and cooperation of operational authorities competent for the fight against terrorism and other related criminal offences;  | National Coordination Body for Preventing and Suppressing Terrorism | RPPO, POOC, SIA, MoI, APML NSCCIPO | IV quarter of 2022  | Financed as part of regular activities of staff  |  |  |  |  |
| 4.1.2. Analyse current CTF human, IT and financial capacities of the authorities competent for the fight against terrorism and other related criminal offences;  | NCBT | RPPO, POOC, SIA, MoI, APMLNSCCIPO | II quarter of 2021  | Financed as part of regular activities of staff |  |  |  |  |
| 4.1.3. Adjust human, IT and financial capacities in line with the outcomes of the analysis under 4.1.2; | GoS | AML/CFT CB | III quarter of 2022  | Financed as part of regular activities of staff/International donor funds |  |  |  |  |
| 4.1.4. Continue systematic research of terrorist financing cases - through exchange of APML reports with competent authorities | APML | POOC, SIA, MoI | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 4.1.5 Improve CFT cooperation with relevant international entities; | NCBT | MFA, APML, MoI, SIA, MIA, MSA,NSCCIPO | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 4.1.6 Analyse compliance of CFT provisions in the current Criminal Code with international standards | MoJ | RPPO | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 4.1.7. Continue training the MoI Financial Investigations Unit on identifying terrorist financing activities; | AML/CFT CB  | MOI, APML | IV quarter of 2022 | Financed as part of regular activities of staff  |  |  |  |  |
| 4.1.8. Deliver continuous training of competent authorities based on best practices in terrorist financing cases; | AML/CFT CB | JA, MoI, SIA, APML | IV quarter of 2022 | Financed as part of regular activities of staff/International donor funds  |  |  |  |  |

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| Measure 4.2: Ensure efficiency of activities to monitor cross-border terrorist financing risks  |
| Authority responsible for implementation (coordination of implementation) of the measure: Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB) |
| Implementation period: 2020-2022 | Type of measure: Information and knowledge sharing |
| Indicator(s) at the level of measure (result indicator): | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| Continuity of training of customs officers and border police on identifying TF risks sustained | Yes/No | Training reports; Work report  | Yes. | 2019 | Yes. | Yes. | Yes. |
| Analysis of alternative funds transfers and use of modern technologies conducted | Yes/No | Analysis | No | 2019 | No | Yes. |  |

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| **Activity title:** | **Authority implementing the activity** | **Partners in the implementation of the activity** | **Deadline for completion of activity** | **Source of financing** | **Link to programme budget** | **Total assessed financial resources by source in RSD 000** |
| **2020** | **2021** | **2022** |
| 4.2.1 Hold continuous training of border police on identifying TF risks; | MoI  |  | IV quarter of 2022 | Financed as part of regular activities of staff/International donor funds |  |  |  |  |
| 4.2.2 Hold continuous training of customs officers on identifying TF risks; | MoF-CA | APML, MoI | IV quarter of 2022 | Financed as part of regular activities of staff/International donor funds |  |  |  |  |
| 4.2.3 Review methods for alternative funds transfers and use of modern technologies (virtual assets, foreign money transfer institutions, etc.) for terrorist financing and adopt new measures as appropriate; | NCBT | NBS, SC,SIA,MOI, APML,NSCCIPO | Analysis: IV quarter of 2021; Adoption of new measures: IV quarter of 2022 | Financed as part of regular activities of staff/International donor funds |  |  |  |  |

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| Measure 4.3: Improvement of the framework for preventing the abuse of the NPO sector for terrorist financing, through active cooperation between the public and NPO sectors |
| Institution responsible for monitoring and control of implementation: Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB) |
| Implementation period: 2020-2022 | Type of measure: Institutional/managerial/organisational |
| Indicator(s) at the level of measure (result indicator): | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| Assessment of compliance with international standards, annually | a) non-compliantb) partially compliantc) largely compliantd) compliant | Reports by competent authorities; Reports of relevant international organisations | Framework is *largely compliant* | 2019 | At least largely compliant | At least largely compliant | At least largely compliant |
| Participation of non-profit organisations in relevant activities, annually | Yes/No | Reports on activities conducted and modalities of NPO participation | Yes. | 2019 | Yes. | Yes. | Yes. |

| **Activity title:** | **Authority implementing the activity** | **Partners in the implementation of the activity** | **Deadline for completion of activity** | **Source of financing** | **Link to programme budget** | **Total assessed financial resources by source in RSD 000** |
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| **2020** | **2021** | **2022** |
| 4.3.1. Analyse legislation, in a participatory process, in relation to operation of competent authorities with respect to registration and de-registration, record-keeping, supervision and cooperation with non-profit organisations, and adjust it as appropriate; | AML/CFT CB | MPALSG, MCI, OCCS, MinEcon-SBRA, NGOWG, NPO sector,APML | Analysis of legislation: IV quarter of 2021; Adjustments in accordance with the analysis: IV quarter of 2022 | Financed as part of regular activities of staffInternational donor funds |  |  |  |  |
| 4.3.2 Conduct an update, in a participatory process, of the analysis of the non-profit sector from the point of view of vulnerability to terrorism financing; | AML/CFT CB | MPALSG, MCI, MoF, SBRA, OCCS, NPOWG, NCT, NPO sector, | IV quarter of 2020 | Financed as part of regular activities of staffDomestic and international donor funds |  |  |  |  |
| 4.3.3 Continue conducting supervision of NPOs, analyse results of the supervision conducted and make statistical reports on the examinations conducted;  | CCIO | NPOWG, MCI | IV quarter of 2022 | Financed as part of regular activities of staff |  |  |  |  |
| 4.3.4 Update criteria and procedures for conducting supervision of NPOs (risk matrix)  | CCIO | NPOWG | IV quarter of 2022 |  |  |  |  |  |
| 4.3.5 Improve cooperation with the NPO sector and donors through promoting transparency, accountability, integrity, self-regulation mechanism, training and sharing of good practice examples, for the purpose of mitigating the risk of their abuse for TF purposes; | OCCS | AML/CFT CB, NPO sector, donors, APML, MoI | IV quarter of 2022 | Financed as part of regular activities of staffDomestic and international donor funds |  |  |  |  |
| 4.3.6 Analyse current human, IT, and financial capacities of authorities relevant for registration and de-registration, record-keeping, supervision and cooperation with the NPO sector  | AML/CFT CB | MPALSG-AI, MCI, OCCS, MinEcon-SBRA, MoF, NPOWG | Analysis: IV quarter of 2021  | Financed as part of regular activities of staffDomestic and international donor funds |  |  |  |  |
| 4.3.7 Improve the system and capacities of the authorities in accordance with the analysis under 4.3.6; | GoS | AML/CFT CB | IV quarter of 2022 | In accordance with the findings of the analysis. To be taken into account in the updated Action Plan.  |  |  |  |  |
| 4.3.8 Continue training inspectors at institutions competent for supervising non-profit organisations; | AML/CFT CB | CCIO, NPOWG | IV quarter of 2022 | Financed as part of regular activities of staffDomestic and international donor funds |  |  |  |  |
| 4.3.9 Raising the level of NPO sector’s knowledge and awareness on legitimate financial operations | AML/CFT CB  | NBS, MPALSG,MCI, OCCS, NPO sector, APML | IV quarter of 2022 | Financed as part of regular activities of staffDomestic and international donor funds |  |  |  |  |
| 4.3.10 Keep updated records on NPO activities related to self-regulation | OCCS | NPO sector | IV quarter of 2022 | Financed as part of regular activities of staffDomestic and international donor funds |  |  |  |  |
| 4.3.11 Improve the web-based application for searching designated persons and continue promoting its use; | APML |  | IV quarter of 2022 | Financed as part of regular activities of staffDomestic and international donor funds |  |  |  |  |

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| Measure 4.4: Improvement and efficient implementation of the legislative framework governing the prevention of terrorism financing |
| Authority responsible for implementation (coordination of implementation) of the measure:Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB) |
| Implementation period: 2020-2022 | Type of measure: Institutional/managerial/organisational |
| Indicator(s) at the level of measure (result indicator): | Unit of measurement | Source of verification | Base value  | Base year | Target value in 2020 | Target value in 2021 | Target value in 2022 |
| Assessment of compliance with relevant international standards, annually | a) non-compliantb) partially compliantc) largely compliantd) compliant | Reports by competent authorities; Reports of relevant international organisations | Framework is largely compliant | 2019 | At least largely compliant | At least largely compliant | At least largely compliant |

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| **Activity title:** | **Authority implementing the activity** | **Partners in the implementation of the activity** | **Deadline for completion of activity** | **Source of financing** | **Link to programme budget** | **Total assessed financial resources by source in RSD 000** |
| **2020** | **2021** | **2022** |
| 4.4.1 Conduct an analysis of compliance of and consistency between the Law on Freezing of Assets with the Aim of Preventing Terrorism and Proliferation of WMD and Law on International Restrictive Measures  | AML/CFT CB | MoJ,MFA, APML  | IV quarter of 2020 | Financed as part of regular activities of staffDomestic and international donor funds |  |  |  |  |
| 4.4.2 Adjust the legislation, as required, to the outcomes of the analysis under 4.4.1; | GoS | AML/CFT CB | IV quarter of 2021 | Financed as part of regular activities of staffDomestic and international donor funds |  |  |  |  |

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| **List of abbreviations** |
| ACAS | Anti-Corruption Agency, |
| SBA | Bar Association of Serbia |
| SBRA | Business Registers Agency |
| ACs | Appellate courts |
| SIA | Security Information Agency |
| MSA | Military Security Agency |
| HPPO | Higher Public Prosecutor’s Office |
| SCC | Supreme Court of Cassation |
| MIA | Military Intelligence Agency |
| GoS | Government of the Republic of Serbia |
| HC | Higher court |
| HJC | High Judicial Council |
| SAI | State Audit Institution |
| CLI | Comparative Law Institute |
| CPN | Chamber of Public Notaries |
| OCCS | Office for Cooperation with Civil Society |
| CCIO | Coordination Commission for Inspection Oversight  |
| NSCCIPO | Office of the National Security Council and Classified Information Protection |
| AML/CFT CB | Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism |
| SC | Securities Commission |
| MPALSG | Ministry of Public Administration and Local Self-Government |
| MPALSG-AI | Ministry of Public Administration and Local Self-Government - Administrative Inspectorate |
| MCI | Ministry of Culture and Information |
| MoJ | Ministry of Justice |
| MoJ-DMSCA | Ministry of Justice - Directorate for Management of Seized/Confiscated Assets |
| MinEcon | Ministry of Economy |
| MTTT | Ministry of Trade, Tourism and Telecommunications |
| MoI | Ministry of the Interior |
| MoF | Ministry of Finance |
| Supervisory authorities | Supervisory authorities under the AML/CFT Law (NBS, MTTT, SC, CPN, SBA, GCHA, APML, MoF-TA) |
| NBS | National Bank of Serbia |
| NCBT | National Coordination Body for the Prevention and Fight Against Terrorism |
| NPO sector | Non-profit sector |
| JA | Judicial Academy |
| AMC | Appellate Misdemeanour Court |
| SCCI | Serbian Chamber of Commerce and Industry |
| POLA | Police Academy |
| MoF-TA-TPol | Tax Police |
| CommC | Commercial Court |
| MC | Misdemeanour court |
| MoF-TA | Tax Administration |
| RGA | Republic Geodetic Authority |
| NPOWG | Working Group for Supervision of NPOs |
| RSPD | Republic of Serbia Property Directorate |
| RPPO | Republic Public Prosecutor’s Office |
| NHIF | National Health Insurance Fund |
| NPDIF | National Pension and Disability Insurance Fund |
| POOC | Prosecutor’s Office for Organised Crime |
| BPD | Border Police Directorate |
| GCHA | Games of Chance Administration |
| PPA | Public Procurement Administration |
| APML | Administration for the Prevention of Money Laundering |
| MoF-CA | Customs Administration |
| CSD | Central Securities Depository and Clearing House (CSD) |