

Pursuant to Article 38, paragraph 1, of the Law on Planning System of the Republic of Serbia (Official Gazette of the Republic of Serbia, No 30/18), and Article 17, paragraph 1 of the Law on Government (Official Gazette of the Republic of Serbia, No. 55/05, 71/05 – corr., 101/07, 65/08, 16/11, 68/12 – Const. Court decision, 72/12, 7/14 – Const. Court decision, 44/14 and 30/18 – other law),

Government hereby adopts the

## **ACTION PLAN for implementing the Strategy Against Money Laundering and the Financing of Terrorism for 2022-2024**

### I. INTRODUCTION

The Strategy against Money Laundering and the Financing of Terrorism (2020-2024) ([AML/CFT Strategy](#)) laid down that the [Action Plan](#) for its implementation was to be valid for a three-year period (2020–2022).

One of the reasons was that public policy documents in the AML/CFT area need to take into account, in an appropriate manner, the findings of the national ML/TF risk assessment ([NRA](#)). Given that the AML/CFT Law<sup>1</sup> provides that the national risk assessment should be made once in three years and that the most recent NRA had been completed in 2018, the authorities proceeded to updating the NRA in 2021. The NRA reports, including the ML NRA, TF NRA, ML/TF NRA in the Digital Asset Sector, and NRA in the area of Financing of Proliferation of Weapons of Mass Destruction, were adopted by the Serbian Government on 30 September 2021. Therefore, the authorities proceeded to developing the Action Plan for implementing the AML/CFT Strategy for 2022-2024 (Action Plan 2022–2024) based on the 2021 NRAs.

In addition to taking into account the 2021 NRA findings, the Action Plan 2022-2024 has retained the 2020-2022 Action Plan items aimed at implementing the outstanding the MONEYVAL's 2016 Mutual Evaluation Report (MER) for Serbia. In particular, the focus is on MONEYVAL recommendations on the improvement of effectiveness of the AML/CFT system. This aspect of the 2022–2024 Action Plan is important as the evaluation of *effectiveness* of the AML/CFT system (i.e. implementation of legislation) by MONEYVAL is yet to be conducted.

**Overview of completed activities.** To ensure the planning process is comprehensive, the coordinators<sup>2</sup> responsible for reporting to the AML/CFT Coordination Body on the level of implementation of the Action Plan, collected information<sup>3</sup> from lead institutions about the implementation of specific Action Plan items and established as follows<sup>4</sup>:

---

<sup>1</sup> Article 70 of the Law on the Prevention of Money Laundering and the Financing of Terrorism, Official Gazette of the Republic of Serbia, No. 113/17, 91/19 and 153/20.

<sup>2</sup> The AML/CFT Strategy provides that the Government will designate the coordinators for informing the AML/CFT Coordination Body on the level of implementation of the Action Plan for implementing the AML/CFT Strategy, which was done in Governmental Decision 05 No: 119-1881/2021 of 4 March 2021. The coordinators and their deputies are designated from the ranks of AML/CFT Coordination Body members.

<sup>3</sup> Information was collected in the period March – June 2021 and in November 2021.

Of 108 2020–2022 Action Plan items, 26 activities were to be implemented in 2020. Eleven activities were fully implemented, 13 were ongoing in nature or in progress, whereas two activities were not implemented (1.2.10<sup>5</sup> and 3.3.4).<sup>6</sup>

As for 2021, out of 11 action items to be implemented in 2021, two were fully implemented, eight were ongoing in nature or in progress, whereas one action item was not implemented (4.3.1<sup>7</sup>) as it will be dealt with by a wider team of experts that needs to be established, the timeframe for its implementation being IV quarter of 2021.

The distribution of action items among the various strategic objectives seems to be commensurate to the current situation in and needs of the AML/CFT system and the risks found. In the first two years of implementation of the Action Plan, 12 implemented activities addressed risk analysis, coordination and cooperation (Specific Objective 1), 11 prevention, supervision and financial intelligence (Specific Objective 2), 8 investigations, prosecutions and convictions for ML and seizure/confiscation of proceeds (Specific Objective 3) and 6 prevention and fight against terrorism financing.

## II. CONSULTATIVE PROCESS

The proponent of the Action Plan is the Ministry of Finance. The 2022-2024 Action Plan was drafted by the *Working Group for Drafting the Proposal for the Action Plan 2022–2024 for implementing the AML/CFT Strategy*. The Working Group was established by the minister of finance in his decision 01 No: 119-01-605/2021 of 27 December 2021 and it comprised 43 members representing 20 authorities in addition to the Working Group chair (i.e. acting director of the Administration for the Prevention of Money Laundering). The following authorities were represented in the Working Group:

1. MoF - Administration for the Prevention of Money Laundering
2. MoF - Customs Administration
3. MoF - Administration for Games of Chance
4. MoF - Tax Administration
5. National Bank of Serbia

---

<sup>4</sup> It should be mentioned here that some of the Action Plan (2020-2022) items that were marked as being ‘in the process of implementation’ are actually *ongoing* in nature (e.g. 1.1.1, 1.1.4, 1.2.2, 3.1.6, etc.), and this should be borne in mind when interpreting the statistics on the level of implementation.

<sup>5</sup> 1.2.10 Analyse the legal framework governing transportation of BNIs (AML/CFT Law, Law on FX Operations)

<sup>6</sup> Activity 3.3.4 was not implemented because the idea to recruit appraisers at the Seized/Confiscated Assets Management Directorate was abandoned. This is because the Directorate manages various types of assets (vehicles, items of value, companies), and this raises the question of the type of assets that the appraiser should be an expert for, and whether the level of engagement required would be enough for the recruited person to have full-time employment. It is much more effective to appraise a certain type of assets as needed, especially because the Directorate can use external appraisals in potential court proceedings.

<sup>7</sup> 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;

6. Security Information Agency
7. Republic Public Prosecutor's Office
8. Prosecutor's Office for Organised Crime
9. Ministry of the Interior
10. Ministry of Justice
11. Supreme Court of Cassation
12. Office of the National Security Council and Classified Information Protection
13. Ministry of Foreign Affairs
14. Securities Commission
15. Chamber of Public Notaries
16. Ministry of Trade, Tourism and Telecommunication (MTTT) - Market Inspection Section
17. MTTT - Sector for Electronic Communications and Postal Services
18. Ministry of Economy
19. Business Registers Agency
20. Ministry of Human and Minority Rights and Social Dialogue

The Working Group also included the members of the 2021 NRA Lead Working Group<sup>8</sup>, thereby ensuring consistency between these two processes.

The relevance of the proposed activities were ensured through an ongoing consultative process, especially as they have been formulated as part of an extensive NRA exercise which involved a wide circle of AML/CFT stakeholders.

More specifically, the National Coordinator and Chair of the Lead Working Group for the 2021 NRA was the same person as in the previous two NRA cycles (a senior APML staff), and the NRA Working Groups members comprised the staff of the Republic Public Prosecutor's Office, Prosecutor's Office for Organised Crime, Ministry of the Interior, Security Information Agency, Office of the National Security Council and Classified Information Protection, Ministry of Justice, Administration for the Prevention of Money Laundering, National Bank of Serbia and Securities Commission. The NRA Working Group was divided into the following subgroups, which were coordinated by staff of the relevant AML/CFT institutions (in the brackets), as follows:

1. National AML/CFT system threats (Republic Public Prosecutor's Office, Prosecutor's Office for Organised Crime);
2. National AML/CFT system vulnerability (Prosecutor's Office for Organised Crime);
3. Financial system vulnerability and assessment of risk in the digital assets sector (National Bank of Serbia and Securities Commission);

---

<sup>8</sup> Decision Establishing the Working Group for Updating the ML/TF NRA, Official Gazette of the Republic of Serbia, No. 19 of 5 March 2021.

4. DNFBP sector vulnerability (Administration for the Prevention of Money Laundering);
5. Assessment of TF and WMD Proliferation Financing risks (Prosecutor's Office for Organised Crime and Office of the National Security Council and Classified Information Protection).

These sub-groups mainly included the same staff members of the relevant authorities and institutions. The entire process engaged more than 200 persons from both the public and private sectors (obliged entities, professional associations, chambers, etc.). Private sector partners were involved from the beginning in all the processes and had the opportunity to present their views concerning the legislative and institutional framework, the practical application of legislation, their understanding and management of ML/TF risks. This ensured risk was looked at from all perspectives, thereby ensuring an informed assessment of efficiency and effectiveness of the AML/CFT system that captures all risks present.

NRA Working Groups and sub-groups held 65 meetings, 10 workshops and close to 100 meetings, webinars and info-sessions with various authorities and private sector partners, covering all the relevant issues required for an appropriate risk assessment.

Meetings with international consultants were also held with the aim of clarifying dilemmas some WG members had and to ensure risk assessment methods were properly understood.

After the adoption of the NRA report on 30 September 2021 and before beginning the work on the 2022-2024 Action Plan document, the NRA Lead Group requested any additional information and suggestions from NRA subgroups and the private sector, thereby once again ensuring all relevant NRA participants were involved in the AP development process.

The consultative process, based on the Law on the Planning System of the Republic of Serbia (Official Gazette of RS, No 30/18), formally started on 21 December 2021 with an appropriate notification was published on the website on the Administration for the Prevention of Money Laundering [www.apml.gov.rs](http://www.apml.gov.rs), and then on the E-Konsultacije portal, informing the public that the work on the 2022-2024 Action Plan for implementing the national AML/CFT Strategy started.

The public consultation lasted from 21 January to 10 February 2022. A public call to participate in the public consultation process and the public consultation report were then published on the APML website and the E-Konsultacije portal.

### III. ACTION PLAN IMPLEMENTATION MECHANISMS

Monitoring of implementation of the 2022–2024 Action Plan and coordination of its implementation is the task of the Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT Coordination Body) which was established by the decision of the Government of the Republic of Serbia (Official Gazette of the Republic of Serbia, No 54/18, 84/19 and 6/21).

The AML/CFT Coordination Body prepares reports on the implementation of the Action Plan activities.

In addition, the Government has appointed coordinators and deputy coordinators (Decision 05 No: 119-1881/2021 of 4 March 2021) (Coordinators) and tasked them with monitoring the implementation of the Action Plan, and to report to the AML/CFT Coordination Body

signalling potential issues, bottlenecks and delays, suggesting ways to address them so that all Action Plan items may be implemented in an appropriate manner and within the timeframes set.

In accordance with the Law on the Planning System of the Republic of Serbia a report on the results of implementation of a strategy and action plan is to be submitted by the proponent through the public administration authority in charge of coordinating public policies, within deadlines set in that Law.

Having in mind the existence of multiple mechanisms of coordination and cooperation among the various AML/CFT/PWMD and its financing, the competent authorities are making sure all these coordination mechanisms and related strategies and risk assessments are consistent and coordinated among each other.

It should be noted that the implementation of the 2022-2024 Action Plan items, which were designed taking into account the 2021 NRA for WMD Proliferation Financing, will be coordinated with the National Coordination Body for the Prevention of Proliferation of Weapons of Mass Destruction.

Likewise, the implementation of the items addressing the TF NRA will be coordinated with the National Coordination Body for the Prevention and Fight Against Terrorism.<sup>9</sup>

Note: ‘Supervisory authorities’ are listed in the list of abbreviations provided in Section VI of this Action Plan. The activities which are ongoing or continuous in nature (this is indicated/suggested in the wording of such AP items) have the last quarter of the last year of implementation, i.e. IV quarter of 2024, as the deadline for their implementation. Where the AML/CFT Coordination Body is indicated as the lead agency for implementation of AP items, there is also an indication, within parentheses, of how this body will be involved in the implementation of the activity (e.g. ‘CB Secretariat’, ‘expert team’, etc.).

#### IV. FINANCIAL RESOURCES NEEDED FOR IMPLEMENTING THE ACTION PLAN

The 2022-2024 Action Plan covers a three-year period starting in 2022 and ending in 2024, and the funds for its implementation will be allocated in the Republic of Serbia budget. Support from international organisations and donors (European Union, OSCE, bilateral assistance, etc.) will also be used as appropriate and/or required. Therefore, any donor funds available will be included in the implementation of the 2022-2024 Action Plan at a later stage.

---

<sup>9</sup> National Coordination Body for the Prevention and Fight Against Terrorism <https://www.pravno-informacioni-sistem.rs/SIGlasnikPortal/eli/rep/sgrs/vlada/odluka/2019/29/6/reg>, National Coordination Body for the Fight against WMD Proliferation for 2021 - 2025 <https://www.pravno-informacioni-sistem.rs/SIGlasnikPortal/eli/rep/sgrs/vlada/odluka/2021/117/3/reg>, Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT Coordination Body) <https://www.pravno-informacioni-sistem.rs/SIGlasnikPortal/eli/rep/sgrs/vlada/odluka/2018/54/2/reg>

V. ACTION PLAN FOR IMPLEMENTING THE AML/CFT STRATEGY IN THE PERIOD 2022-2024 - TABLE

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

<b>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.</b>						
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 2024	Last year of AP validity
<b>Assessment of technical compliance</b> of the AML/CFT and non-WMD proliferation system in Serbia with international (FATF) standards	<b>Technical compliance assessment:</b> a) non-compliant b) partially compliant c) largely compliant d) compliant	MoneyVal Fifth Round <b>Mutual Evaluation Report</b> for Serbia	<b>Technical compliance assessment:</b> 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 <i>non-compliant (1)</i> and <i>partially compliant (16)</i> (unsatisfactory assessments). Until December 2021, these ratings were upgraded to either <i>largely compliant</i> or <i>compliant</i> (satisfactory assessments) for all of	2021	Satisfactory ratings for all 40 FATF Recommendations (i.e. <i>compliant</i> or <i>largely compliant</i> )	<b>2024</b>

			these 17 FATF Recommendations. <sup>10</sup>			
<b>Assessment of compliance</b> of the AML/CFT and non-WMD proliferation system in Serbia with international (FATF) standards at the level of <b>effectiveness</b> ;	<b>Effectiveness assessment</b> a) low level of effectiveness b) moderate level of effectiveness c) substantial level of effectiveness d) high level of effectiveness	MoneyVal Fifth Round <b>Mutual Evaluation Report</b> for Serbia	<b>Effectiveness:</b> The base value was determined in 2016, partial assessment for the <b>strategic issues</b> (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.	2016, 2019, 2021	<b>Effectiveness:</b> positive and tangible impact on all 11 Immediate Outcomes under the FATF Methodology	
<b>Updated National Risk Assessment</b>	Yes/No	<b>Government Conclusion</b> on the adoption of the updated NRA report	<b>Updated National Risk Assessment:</b> Yes	2021	Yes	

<b>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</b>							
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 2022	Target value in 2023	Target value in 2024

<sup>10</sup> For the purpose of clarification, it should be noted that, according to the evaluation rules, MONEYVAL also looks at the level of compliance with those standards that have been revised since the time of adoption of the Mutual Evaluation Report (MER), so the Republic of Serbia was re-assessed with respect to FATF Recommendation 15 (New Technologies) on which the 2016 MER assessed it as being *largely compliant*. Apart from noting a significant progress in implementing the revised Recommendation 15 (new technologies, virtual assets, virtual asset service providers), which is reflected in the introduction of a comprehensive legal and regulatory framework for VA and VASPs (i.e. Law on Digital Assets and regulations passed based on this law) and in improvement of AML/CFT legislation that applies on VASPs, as well as in the fact that supervisors have established cooperation in this area and cooperation with foreign supervisors initiated, and a NRA developed specifically for this area, MONEYVAL decided to downgrade the rating on this recommendation from *largely* to *partially* compliant. The reason is of procedural nature, i.e. MONEYVAL has the rule to consider information that the assessed country submits no later than six months before the discussion of progress (which in this case took place in December 2021), whereas the ML/TF NRA in the area of VA was adopted on 30 September 2021.

1. Updated National Risk Assessment	Yes/No	National Risk Assessment report, Moneyval Report	Yes	2021	No	No	Yes
2. Progress on relevant immediate outcomes in line with FATF Methodology is sustained.	Yes/No	Work reports of coordination bodies, supervisors, other institutions Moneyval Report	Yes	2021	Yes	Yes	Yes

<b>Measure 1.1: Maintaining and improvement of comprehensive understanding of money laundering and terrorism financing risks in the Republic of Serbia</b>							
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: 2022-2024				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 2022	Target value in 2023	Target value in 2024
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; Reports by competent authorities; Training reports and reports about presentation of NRA findings	Yes	2021	No	No	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; Reports by competent authorities; Training reports and reports about presentation of NRA findings	Yes	2021	Yes	Yes	Yes

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
1.1.1 Determining the methodology and updating of the ML/TF and WMD Proliferation NRAs (in 2024)	APML (NRA WG)	All AML/CF T/WMD P stakeholders, as required	II quarter of 2024	Methodology determined; risk assessments updated	Adopted ML/TF NRA document	Donor funds				
1.1.2. Prepare a plan of activities to mitigate the risks found as a result of the activity under 1.1.1.	MoF	Working group for the development of the Action Plan	II quarter of 2022	Plan of action to mitigate the risks developed	Report on the developed plan of action to mitigate the risks	Republic of Serbia Budget - Regular costs of staff Donor funds				
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	APML (NRA WG)	Authorities competent for AML/FT /WMDP, private sector (e.g. professional associations), non-profit sector	IV quarter of 2022	Presentations of NRA findings held	Reports on presentations of NRA findings	Donor funds				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
1.1.4. Presentation of NRA findings to the Coordination Commission for Inspection Oversight	AML/CF FT CB, APML (NRA WG)	CCIO	II quarter of 2022	NRA findings presented to the CCIO	Reports on the presentation of NRA findings to the CC					
1.1.5. Presentation of NRA findings to the National AML/CFT Coordination Body and National Coordination Body for the Prevention of WMD Proliferation	AML/CF FT CB, APML (NRA WG)	National AML/CF T CB, National Coordination Body for the Prevention of WMD Proliferation	II quarter of 2022	NRA findings presented to the CCIO	Reports on the presentation of NRA findings to the CC					
1.1.6. Ensure that all institutions prioritise their work based on NRA findings (ongoing)	AML/CF FT CB	AML/CF T supervisors, all institutions of the preventive and repressive segment	IV quarter of 2024	Priorities set based on NRA findings	Competent authorities' work reports	Republic of Serbia Budget - Regular costs of staff				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
		of the AML/CF T/WMD P system								
1.1.7. Training on the implementation and use of the software application for statistical monitoring of ML and TF cases for all involved stakeholders	RPPO	SCC, MOI, SIA, MOF-TA, MOF-CA, MOJ-DMSCA, APML	IV quarter of 2022	Number of training events held	Training reports	Donor funds				
1.1.8. Active and consistent use of the software application for statistical monitoring of ML/TF cases by all relevant stakeholders	AML/CF FT CB	SCC, RPPO, MOI, SIA, MOF-TA, MOF-CA, MOJ-DMSCA	II quarter of 2023	Number of entries (new cases and modifications to those already recorded) and statistical reports generated	Reports by competent authorities using the software application	Donor funds				
1.1.9. Periodic analysis of use of the software application for monitoring ML/TF cases (ongoing)	AML/CF FT CB	SCC, RPPO, MOI, SIA, MOF-TA,	IV quarter of 2024	Number of analyses of use of the software application	Overviews of periodic analyses of use of the software application					

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
										MOF-CA, MOJ-DMSCA
1.1.10. Improvement and upgrade of the software application for monitoring ML/TF cases in line with the needs of the beneficiaries (ongoing)	AML/CF FT CB	SCC, RPPO, MOI, SIA, MOF-TA, MOF-CA, MOJ-DMSCA	IV quarter of 2024	Beneficiaries' suggestions for improvement of the software given; Software application upgraded in line with the suggestions	Report by competent authorities on their suggestions for improvement of the software application; Report on the improvement and upgrade of the software application	RS Budget - Jointly by all signatories to the Agreement				
1.1.11. Informing the heads of institutions involved in the development of the NRA about the significance, systematic character and ongoing nature of the NRA process, as well as on the	AML/CF FT CB, APML (NRA WG)	All AML/CF T/WMD P stakeholders, as required	IV quarter of 2023	Number of info-sessions held	Reports on the info-sessions held					

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
contribution and role of their specific institutions in the NRA process										
1.1.12. Development of an operational manual for analysing the efficiency and effectiveness of the AML/CFT system	CB (Expert Team)	RPPO, POOC, APML, MoI, SCC and other relevant authorities	IV quarter of 2024	Operational manual for analysing the efficiency and effectiveness of the AML/CFT system developed	Operational manual, Report concerning the development of the operational manual	Donor funds				
1.1.13. Establishment of expert teams in line with the Rules of Procedure of the AML/CFT Coordination Body (ongoing)	AML/CFT CB	Relevant bodies and institutions	IV quarter of 2024	Number and classification of the established expert teams	Decisions establishing expert teams	Republic of Serbia Budget - Regular costs of staff				
1.1.14. Periodic submission of information to the AML/CFT CB about the performance of expert teams established for specific Action Plan	CB (Expert Team)		IV quarter of 2024	Number of submitted reports to the AML/CFT CB about expert team performance	Periodic reports by expert teams	Republic of Serbia Budget - Regular costs of staff				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
items (ongoing)										
1.1.15. Establish a mechanism for sharing information to and consulting the AML/CFT CB on the plans and activities of other coordination mechanisms or under other public policy documents that have an effect on the AML/CFT/WMDPF system (ongoing)	CB (Secretariat), NSCCIP O	CCIO, NCB for the Prevention and Fight Against Terrorism, NCB for the Prevention of WMD Proliferation	IV quarter of 2024	The mechanism of information sharing and consultation established	Decision concerning the mechanism for information sharing and consultations with the AML/CFT CB on the plans and activities of other coordination mechanisms or under other public policy documents	Republic of Serbia Budget - Regular costs of staff				
1.1.16. Reporting to the AML/CFT CB in line with Activity 1.1.15. (ongoing)	CB (Secretariat)	CCIO, NCB for the Prevention and Fight Against Terrorism, NCB	IV quarter of 2024	Reports submitted to the AML/CFT CB	Reports by coordination bodies and other relevant institutions	Republic of Serbia Budget - Regular costs of staff				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
		for the Prevention of WMD Proliferation All relevant institutions								
1.1.17. Regular review of adequacy of the regulatory framework related to digital assets concerning the ML/TF/WMDPF risks, especially for the purpose of aligning with the most recent regulatory trends and international standards (ongoing)	CB (Secretariat), NBS, SC	MOF, APML	IV quarter of 2024	Adequacy of the regulatory framework reviewed in relation to digital assets concerning the ML/TF/WMDPF risks	Report on the adequacy of the regulatory framework in relation to digital assets concerning the ML/TF/WMDPF risks	Republic of Serbia Budget - Regular costs of staff				

<b>Measure 1.2: Mitigation of the risks found and continuous identification of new threats and vulnerabilities</b>	
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: 2022-2024	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 2022	Target value in 2023	Target value in 2024
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	2021	Yes	Yes	Yes

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
1.2.1 Creation of a plan of priority analyses aimed at reviewing the threats and vulnerabilities for the high-threat sectors	APML		II quarter of 2022	Analyses prioritised	Plan of priority analyses	Republic of Serbia Budget - Regular costs of staff				
1.2.2. Development of a specific real estate-related ML/TF risk assessment	CB (Expert Team)	Relevant AML/CFT authorities	II quarter of 2023	Specific real estate-related ML/TF risk assessment conducted	Money laundering and terrorist financing risk assessment document for the real-estate sector	Republic of Serbia Budget - Regular costs of staff				
1.2.3. Sharing of information with all AML/CFT stakeholders about the findings of the analyses in Action Plan items 1.2.2. and	CB (Expert Team)	RPPO, MoI, APML, MoF-CA, Supervisory authorities	IV quarter of 2023	Number and type of stakeholders who were informed about the outcome of	NRA Working Group report	Donor funds				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
items 2.3.20, 2.3.21, 2.3.22, 2.3.23 under Specific Objective 2		s, private sector partners (obliged entities and professional associations)		the analyses						
1.2.4. Analysis of case studies and identification of ML/TF trends and typologies	CB (Expert Team), SCC, RPPO, Appellate courts	POOC, MoI, APML, MoF-CA, SIA, Supervisory authorities, etc.	IV quarter of 2022	Case studies analysed, ML/TF trends and typologies identified	Trends and typologies document	Donor funds				
1.2.5. Presentation of the ML/TF trends and typologies to the relevant AML/CFT stakeholders	CB (Expert Team), RPPO, Appellate courts, SCC	POOC, MoI, APML, MoF-CA, SIA, Supervisory authorities, etc.	IV quarter of 2023	Type and number of AML/CFT stakeholders to whom the ML/TF trends and typologies were presented	Trends and typologies presentation reports	Donor funds				
1.2.6. Presentation of	AML/C	APML	IV	Type and	Trends and	Donor funds				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
the relevant international trends and typologies to the relevant WMDPF stakeholders	FT CB		quarter of 2022	number of WMDPF stakeholders to whom the relevant international trends and typologies were presented	typologies presentation reports					
1.2.7. Submission of periodic reports by supervisors concerning new products and new technologies in the financial and DNFBP sectors, including a risk analysis (ongoing)	Supervisory authorities	AML/CFT CB, APML	IV quarter of 2024	Number of supervisors reporting and reports submitted to the AML/CFT CB concerning new products and new technologies in the financial and DNFBP sectors, including a risk analysis	Supervisors' reports	Republic of Serbia Budget - Regular costs of staff				
1.2.8. Analysis of threats in relation to	NBS	APML, MoI,	IV quarter	Threats in relation to	Analysis document	Republic of Serbia				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
the operations of e-money institutions from third countries		relevant authorities	of 2022	the operations of e-money institutions from third countries analysed		Budget - Regular costs of staff				
1.2.9. Continuous monitoring of products and activities that may be abused for ML, TF or WMDPF, in cooperation with the private sector (ongoing)	Supervisory authorities	APML, obliged entities, professional associations	IV quarter of 2024	Number of analysed products and activities that may be abused for ML, TF or WMDPF, in cooperation with the private sector	Regular reports by supervisors concerning the products and activities that may be abused for ML, TF or WMDPF	Republic of Serbia Budget - Regular costs of staff				
1.2.10. Notification of AML/CFT/WMDPF authorities about products and activities that pose an ML/TF/WMDPF risk as found under item 1.2.9. (ongoing)	APML	AML/CFT CB, other relevant authorities	IV quarter of 2024	Number and type of notifications to state authorities about products and activities that pose an ML/TF/WMDPF risk	APML reports about notifications to state authorities about products and activities that pose an ML/TF/WMDPF risk	Republic of Serbia Budget - Regular costs of staff				
1.2.11. Analyse the	APML,	NBS,	IV	Legal	Analysis	Republic of				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
legal framework governing the physical transportation of BNIs (AML/CFT Law, Law on FX Operations)	CB (Expert Team)	MoI-CA, MoI, competent courts	quarter of 2022	framework governing the physical transportation of BNIs analysed	report on the legal framework governing the physical transportation of BNIs	Serbia Budget - Regular costs of staff				
1.2.12. Amend the normative framework in accordance with the findings of the analysis under item 1.2.11.	MoF	NBS	II quarter of 2023	Normative framework amended in accordance with the findings of the analysis	Amendments to relevant legislation	Republic of Serbia Budget - Regular costs of staff				
1.2.13. Improvement of the normative framework for addressing the issue of registration of natural persons - investors for VAT purposes (Rulebook)	MoF	MoF - Tax Administration	IV quarter of 2022	Rulebook (by-law) governing the issue of registration of natural persons - investors for VAT purposes passed	Rulebook (by-law) passed	Republic of Serbia Budget - Regular costs of staff				
1.2.14. Compare NRA findings and supervisors' examination reports	AML/CFT CB	Supervisory authorities	IV quarter of 2024	Number of analyses related to the comparison	Report assessing the level of understanding	Republic of Serbia Budget - Regular				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
at least once a year in order to assess the level of obliged entities' understanding of risk (ongoing)				of NRA findings and supervisors' examination reports	g of ML/TF risk by obliged entities	costs of staff				
1.2.15. Establishment of mechanisms for information exchange among the competent authorities in the area of digital assets	Prosecutor's Office for Cybercrime, MOI, APML	NBS, SC, Supervisory authorities, APML	IV quarter of 2022	Mechanisms for information exchange among the competent authorities in the area of digital assets established	Decision establishing the mechanisms for information exchange	Republic of Serbia Budget - Regular costs of staff				
1.2.16. Improvement of operational cooperation among the competent authorities with respect to criminal or other proceedings related to digital assets by holding regular meetings (ongoing)	MoI, Public Prosecutors' Offices, APML, supervisory authorities	NBS, SC	IV quarter of 2024	Operational cooperation among the competent authorities with respect to criminal or other proceedings related to digital assets by holding regular meetings improved	Meeting reports	Republic of Serbia Budget - Regular costs of staff				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
1.2.17. Comparative analysis of international experiences and assessment of options for improving the reporting in relation to transactions related to digital assets using card payment systems and foreign e-money institutions	NBS	APML, SIA, Prosecutor's Office for Cybercrime, MoI	II quarter of 2023	Comparative analysis conducted, options for improving the reporting system assessed	Analysis of international experiences and options for improving the reporting in relations to transactions with digital assets using card payment systems and foreign e-money institutions (document)	Republic of Serbia Budget - Regular costs of staff				
1.2.18. Collection and analysis of data on transactions related to the use of prepaid mobile cards (ongoing)	NBS	APML, SIA	IV quarter of 2024	Number and type of collected and analysed data	Report on the collected and analysed data	Republic of Serbia Budget - Regular costs of staff				
1.2.19. Sharing of information with the relevant AML/CFT authorities about the outcome of the analysis in item	NBS	AML/CFT CB	IV quarter of 2024	Authorities, number of authorities and number of information	Report on the method of submission of information	Republic of Serbia Budget - Regular costs of staff				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
1.2.17				documents submitted	to relevant institutions					
1.2.20. Review the quality of risk analyses conducted by obliged entities in line with Article 6 of the AML/CFT Law (ongoing)	CB (Expert Team), APML	Supervisory authorities	IV quarter of 2024	Number of risk assessment analyses conducted at the level of institution in line with Article 6 of the AML/CFT Law	Report on the analysis of risk assessments at the level of institution conducted in line with Article 6 of the AML/CFT Law	Republic of Serbia Budget - Regular costs of staff				
1.2.21. Exchange of international experiences through study visits with the aim of improving the criteria for threat and vulnerability analysis and application of the methodology for an appropriate risk assessment	APML (NRA WG)	CB, RPPO, POOC, APML, MoI, SIA, NSCCIP O, NBS, SC	IV quarter of 2022	Number of study visits completed	Report on the used criteria for threat and vulnerability analysis and application of the methodology for an appropriate risk assessment	Donor funds				

**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: 2022-2024				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 2022	Target value in 2023	Target value in 2024
Progress in effectiveness and level of technical compliance with relevant international standards, annually	Yes/No	Moneyval report, Competent authorities'/Coordination body work reports	Yes	2021	Yes	Yes	Yes

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
1.3.1 Sharing of experiences with regional countries with respect to the threats and vulnerabilities found in their respective NRAs, especially those with a cross-border/international dimension	CB (Expert Team)	Regional partners	IV quarter of 2022	Amount of information collected about the threats and vulnerabilities found in NRAs relevant for the regional level	Conclusions concerning the threats and vulnerabilities found in NRAs relevant for the regional level; Regional meeting reports	Donor funds				

Activity title:	Authority	Partner authority	Deadline for	Indicator at the level of	Source of verification	Source of financing	Link to progra	Total assessed financial resources by source in RSD 000		
1.3.2 Analyse the need for developing a regional risk analysis or assessment, networking with public registers in other countries and other initiatives, in line with good international practices.	CB (Expert Team)	Relevant AML/CF T authorities	IV quarter of 2022	Possibilities for regional risk assessment etc. considered	Analysis of the need for conducting a regional risk assessment and potential ways of networking with registries of foreign countries (document)	Donor funds				
1.3.3. Improve record keeping of the requests for mutual legal assistance involving risk-posing forms of company	MoJ		IV quarter of 2022	Record keeping of the MLA requests involving risk-posing forms of company improved	Records of MLA requests involving risk-posing forms of company introduced	Republic of Serbia Budget - Regular costs of staff				
1.3.4. Improvement of cooperation and sharing of information on SARs exchanged between the supervisors and APML (Sector for analysis and counter-terrorist financing) (ongoing)	APML	Supervisory authorities	IV quarter of 2024	Cooperation and information exchange between the APML and supervisors improved	APML and supervisors' meeting reports	Republic of Serbia Budget - Regular costs of staff				
1.3.5. Monitoring of implementation of the MoU between the RPPO and	APML, RPPO	CB, POOC	IV quarter of 2024	Number of meetings held on the implementati	Report on the implementation of the	Republic of Serbia Budget - Regular				

Activity title:	Authority	Partner authority	Deadline for	Indicator at the level of	Source of verification	Source of financing	Link to program	Total assessed financial resources by source in RSD 000		
APML (ongoing)				on of the MoU	MoU	costs of staff				
1.3.6. Continuous exchange of information between the supervisory authorities in accordance with the signed agreements on AML/CFT cooperation (ongoing)	Supervisory authorities		IV quarter of 2024	Amount of information exchanged with foreign counterparts	Reports on information shared	Republic of Serbia Budget - Regular costs of staff				
1.3.7. 1.3.3 Signing of MOUs between national supervisory authorities and AML/CFT supervisors of other countries (ongoing)	Supervisory authorities	AML/CFT CB	IV quarter of 2024	Number of MOUs between national AML/CFT supervisors and foreign AML/CFT supervisors signed	Supervisors' reports on MOUs signed	Republic of Serbia Budget - Regular costs of staff				
1.3.8. Intensification of inspection oversight in relation to the Law on Central Records of Beneficial Owners (LCRBO) in accordance with the recommendation of the Coordination Commission (ongoing)	Competent supervisory authorities	Coordination Commission	IV quarter of 2024	Number of conducted examinations of compliance with LCRBO in accordance with CC and percentage of the increase in examination	Reports on the conducted inspection oversight in relation to the LCRBO	Republic of Serbia Budget - Regular costs of staff				

Activity title:	Authority	Partner authority	Deadline for	Indicator at the level of	Source of verification	Source of financing	Link to progra	Total assessed financial resources by source in RSD 000		
				s						
1.3.9. Enter into asset sharing agreements with other countries (ongoing)	MoJ		IV quarter of 2024	Number of asset sharing agreements with other countries	MoJ report on asset sharing agreements signed with other countries	Republic of Serbia Budget - Regular costs of staff				
1.3.10. Development of a joint operational guidance for mutual legal assistance at the regional level	RPPO	MoJ, MoI, JA	III quarter of 2022	Joint operational guidance developed	Joint operational guidance paper	Donor funds				
1.3.11. Delivery of regional workshops to present the guidance paper	RPPO	MoJ, MoI, JA	IV quarter of 2022	Number of delivered regional workshops to present the guidance paper	Workshop reports	Donor funds				

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: 2022-2024				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 2022	Target value in 2023	Target value in 2024
Overall assessment of technical compliance of the Serbian AML/CFT system with international standards	<i>Largely compliant (LC) or compliant (C) ratings</i>	Progress reports by competent authorities and Moneyval	NC (non-compliant) – 0 PC (partially compliant) – 1 LC (largely compliant)– 34 C (compliant) – 5	2021	NC – 0 PC – 1 LC/C – 40	NC – 0 PC – 0 LC/C - 40	NC – 0 PC – 0 LC/C - 40

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
1.4.1. Monitoring the level of compliance with international standards in the area of AML/CFT/WMDPF (ongoing)	CB (Secretariat)	Relevant bodies and institutions	IV quarter of 2024	Number and type of deficiencies found in the level of compliance with international standards in the area of fight against money laundering, terrorism financing and financing of proliferation of WMD	CB Secretariat reports	Republic of Serbia Budget - Regular costs of staff				
1.4.2. Initiating and supporting activities aimed at implementing international recommendations (ongoing)	AML/CFT CB	CB Secretariat, AML/CFT bodies and institutions	IV quarter of 2024	Number of initiated and implemented activities aimed at implementing international recommendations	Report on initiated and implemented activities aimed at implementing international recommendations	Republic of Serbia Budget - Regular costs of staff				

1.4.3. Raising of awareness with and informing all relevant AML/CFT/FPWMD stakeholders about the FATF standards, guidelines and best practices (ongoing)	CB (Secretariat)	Relevant authorities	IV quarter of 2024	Number notifications/posts, presentations and events aimed at raising awareness with and informing all relevant AML/CFT/FPWMD stakeholders about the FATF standards, guidelines and best practices	Report on the activities to raise awareness and inform all relevant AML/CFT/FPWMD stakeholders about the FATF standards, guidelines and best practices	Republic of Serbia Budget - Regular costs of staff  Donor funds				
1.4.4. Follow and analyse AML/CFT/FPWMD activities at the EU level in a regular manner (ongoing)	CB (Secretariat)	Relevant bodies and institutions	IV quarter of 2024	AML/CFT/FPWMD activities at the EU level are regularly followed	Report on the activities aimed at following and analysing AML/CFT/FPWMD activities at the EU level shared with the relevant authorities	Republic of Serbia Budget - Regular costs of staff				

1.4.5. Introduce measures as necessary in the Republic of Serbia, in accordance with the analyses under the previous action items and Measure 1.4.	AML/CFT CB	Relevant bodies and institutions	IV quarter of 2022	Measures introduced in accordance with the findings of the analysis	Report on the introduced measures in the area of AML/CFT/FPWMD in accordance with the findings of the analysis	Republic of Serbia Budget - Regular costs of staff				
1.4.6. Ensure relevant international instruments and documents are translated in to the Serbian language in order to make them available to all AML/CFT/FPWMD stakeholders (ongoing)	AML/CFT CB	MoF	IV quarter of 2024	Number of translated instruments and documents	International instruments and documents available in Serbian	Budget Donor funds				

<b>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</b>							
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 2022	Target value in 2023	Target value in 2024
Assessment of technical compliance with relevant international standards and recommendations	<i>Largely compliant</i> (LC) or <i>compliant</i> (C) ratings	Progress reports by competent authorities and Moneyval	NC – 0 PC – 4 LC – 31 C – 5	2019	NC – 0 PC – 0 LC/C - 40	NC – 0 PC – 0 LC/C - 40	NC – 0 PC – 0 LC/C - 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

<b>Measure 2.1. Improvement of efficiency of monitoring and quality of suspicious activity reports submitted by the obliged entities to the APML</b>							
Institution responsible for monitoring and control of implementation: Administration for the Prevention of Money Laundering							
Implementation period: 2022-2024				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 2022	Target value in 2023	Target value in 2024
Progress on immediate outcome 6 under the FATF Methodology, annually	Yes/No	Progress reports by competent authorities and Moneyval	Yes	2019	Yes	Yes	Yes

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
2.1.1. Pass new or improve current suspicious activity reporting recommendations	APML	Supervisory authorities, MoI, RPPO	IV quarter of 2022	Recommendations passed	Recommendations published	Donor funds				
2.1.2. Upgrade the system of notifying all obliged entity groups about the outcome of their SARs (feedback to obliged entities) (ongoing)	APML		IV quarter of 2024	Number of meetings, annually	Annual reports	Republic of Serbia Budget - Regular costs of staff				

2.1.3. 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	NBS, SC	APML, other supervisory authorities, MoI, RPPO Cybercrime Department	IV quarter of 2022	Indicators passed	Indicators published	Republic of Serbia Budget - Regular costs of staff				
2.1.4. Targeted training with the aim of improving the quality of SARs in line with NRA findings (ongoing)	APML	Supervisory authorities, law enforcement agencies, obliged entities, other institutions	IV quarter of 2024	Number of trainings delivered	Report on training delivered	Republic of Serbia Budget - Regular costs of staff Donor funds				

<b>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</b>							
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: 2022-2024				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 2022	Target value in 2023	Target value in 2024
Improved system of registration of beneficial owners	Yes/No	SBRA work report	No	2019	Yes	Yes	Yes
Rulebook on the methodology for complying with the AML/CFT Law amended in line with NRA findings	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	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
2.2.1. 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 ground; to upload the documents and ownership structure charts into the Centralised Records) and develop/improve the software application accordingly.	MinEcon	SBRA	IV quarter of 2022	Law on Centralised Records of Beneficial Owners amended	Law amending the Law on Centralised Records of Beneficial Owners published	Republic of Serbia Budget - Regular costs of staff		17.700		
2.2.2. Update the acts (guidelines, decisions etc.) related to risk assessment, i.e. for applying the AML/CFT Law in line with the NRA	Supervisory authorities	Private sector	II quarter of 2022	Risk-assessment guidelines or acts for applying the AML/CFT Law amended in line with the NRA findings	Amended risk-assessment guidelines or acts for applying the AML/CFT Law in line with the NRA findings published	Republic of Serbia Budget - Regular costs of staff				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
findings										
2.2.3. Develop indicators for identifying persons and transactions suspected to be money laundering in line with NRA findings	Supervisory authorities	APML, private sector	II quarter of 2022	Indicators for identifying persons and transactions suspected to be money laundering in line with NRA findings developed,	Indicators for identifying persons and transactions suspected to be money laundering in line with NRA findings published	Republic of Serbia Budget - Regular costs of staff				
2.2.4. Pass or improve, as appropriate, the questionnaires for examining compliance with the AML/CFT Law and LAF in accordance with NRA findings	Supervisory authorities	Supervisory authorities	IV quarter of 2022	Newly developed or improved questionnaires	Administration of questionnaires	Republic of Serbia Budget - Regular costs of staff				
2.2.5. Initiate the modification to the Payment Order Payment Codes for executing RSD transactions	MoF	NBS, APML, RPPO	IV quarter of 2022	Payment code modifications initiated	Initiative submitted to the NBS	Republic of Serbia Budget - Regular costs of staff				
2.2.6. Modify the Payment Order Payment Codes for executing RSD transactions	CB (Expert Team), MFIN	APML, NBS, RPPO	II quarter of 2023	Decision drafted	Decision adopted	Republic of Serbia Budget - Regular costs of staff				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
2.2.7. 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	MoF - Tax Administration, NBS	IV quarter of 2022	Rulebook drafted	Rulebook passed	Republic of Serbia Budget - Regular costs of staff				
2.2.8. Monitoring of compliance with the AML/CFT Law when identifying and verifying client identity using electronic communication devices (ongoing)	Supervisory authorities	CB (Secretariat), CB	IV quarter of 2024	Report on the monitoring of compliance with the AML/CFT Law when identifying and verifying client identity using electronic communication devices drafted	Report presented to the CB	Republic of Serbia Budget - Regular costs of staff				

<b>Measure 2.3. Improve the operation of AML/CFT supervisors in line with the risks found in the NRA</b>	
Institution responsible for monitoring and control of implementation: Coordination Body for the Prevention of Money Laundering and the Financing of Terrorism (AML/CFT CB)	
Period of implementation: 2022-2024	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 2022	Target value in 2023	Target value in 2024
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	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
2.3.1. Improve the supervision methodology and risk assessment matrices in line with the updated National Risk Assessment findings	Supervisory authorities	Supervisory authorities	III quarter of 2022	Methodology improved	Updated methodology adopted as necessary	Republic of Serbia Budget - Regular costs of staff				
2.3.2. Analysis of capacities (staffing, technical, financial) of relevant competent authorities and professional development of staff of various institutions involved in the AML/CFT system (those with roles under the AML/CFT Law, Law on Freezing of Assets with the Aim of Preventing Terrorism)	Supervisory authorities, other than NBS	Supervisory authorities, other than NBS	IV quarter of 2022	Analysis conducted	Analysis report prepared	Republic of Serbia Budget - Regular costs of staff				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
and Proliferation of WMD - LAF)										
2.3.3 Improve capacities of supervisory authorities, as appropriate, in accordance with the findings of the analysis under item 2.3.2.	Supervisory authorities, other than NBS	Supervisory authorities, other than NBS	II quarter of 2023	Measures and activities with the aim of improving HR, technical and financial capacities taken and implemented	Report on the improvement of HR, technical and financial capacities	Republic of Serbia Budget - Regular costs of staff				
2.3.4. Develop a plan of offsite and onsite supervision taking into account the RBA and risks found in the updated NRA (ongoing)	Supervisory authorities	Supervisory authorities	IV quarter of 2024	The plan of offsite and onsite supervision developed	Report on conducted inspections	Republic of Serbia Budget - Regular costs of staff				
2.3.5. Implementation of supervision of compliance with requirements related to record-keeping, accuracy and updating of the recorded data and keeping of data and documents in line with the LCRBO (ongoing)	Supervisory authorities under the LCRBO	Coordination Commission for Inspection Oversight, supervisory authorities under the	IV quarter of 2024	Number of inspections conducted	Report on conducted inspections	Republic of Serbia Budget - Regular costs of staff				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
		LCRBO								
2.3.6. Professional training of supervisors' staff about the provisions of the AML/CFT Law and LAF and about the findings of the NRAs (ongoing)	APML	SCCI, professional associations Supervisory authorities	IV quarter of 2024	Number of training events held	Training reports	Republic of Serbia Budget - Regular costs of staff  Donor funds				
2.3.7. Develop a training needs analysis for supervisory authorities related to the implementation of AML/CFT legislation in the digital assets sector in line with NRA findings	NBS, SC	Supervisory authorities, APML, MoI, High-Tech (cyber-) Crime	II quarter of 2022	Analysis conducted	TNA paper	Donor funds				
2.3.8. Professional training of supervisory authorities for the digital assets sector, in line with the analysis in item 2.3.7. (ongoing)	NBS, SC	Other supervisory authorities	IV quarter of 2024	Number of training events held	Training reports	Republic of Serbia Budget - Regular costs of staff,  Donor funds				
2.3.9. Develop a	APML, CB	APML,	II quarter of	TNA conducted	TNA paper	Republic of Serbia				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
training needs analysis for accountants, authorised currency exchange operators, real estate lease and trade agents, casinos and online casinos in line with NRA findings	(Expert Team)	MTTT, Games of Chance Administration, NBS	2022			Budget - Regular costs of staff  Donor funds				
2.3.10. Delivery of the required training for accountants, authorised currency exchange operators, real estate lease and trade agents, postal operators, casinos and online casinos in line with the outcome of the preceding item (ongoing)	APML, MTTT, Games of Chance Administration, NBS	APML, MTTT, Games of Chance Administration, NBS	IV quarter of 2024	Number of training events held	Report on training delivered	Republic of Serbia Budget - Regular costs of staff,  Donor funds				
2.3.11. Awareness raising with the private sector (FIs, DNFBPs, VASPs) about ML/TF threats in the VA/VASP sector (ongoing)	CB (Expert Team)	NBS, Securities Commission, SCCI, professional associations,	IV quarter of 2024	Number of training events held	Training reports	Republic of Serbia Budget - Regular costs of staff,  Donor funds				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
		private sector, other supervisory authorities								
2.3.12. Improve the capacities of misdemeanour and commercial courts through training of misdemeanour and commercial court judges about the application of the AML/CFT Law (ongoing)	APML	SCC, HJC, AMC, AC, misdemeanour courts, commercial courts, supervisory authorities	IV quarter of 2024	Number of training events held	Training reports	Donor funds				
2.3.13. Improve the capacities of misdemeanour and commercial courts through training of misdemeanour and commercial court judges about the application of the Law on Central	APML, MINECON	SCC, HJC, AMC, AC, appellate courts, misdemeanour courts, commerc	IV quarter of 2024	Number of training events held	Training reports	Donor funds				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
Records of Beneficial Owners (ongoing)		ial courts, supervisory authorities								
2.3.14. Advanced training of competent authorities conducting the control/supervision of compliance with the Law on the Central Records of Beneficial Owners (ongoing)	APML, MINECON	Supervisory authorities under the LCRBO	IV quarter of 2024	Number of training events and study visits completed	Training and study visit reports	Donor funds				
2.3.15. Improve competent authorities' knowledge through training on financial products which may be abused for the purposes of money laundering or terrorist financing or financing of WMD proliferation (capital market, BNIs, FX operations, etc.). (ongoing)	RPPO, POOC, MoI	NBS, Supervisory authorities, MoF-TA, MoF-CA	IV quarter of 2024	Number of training events held	Training reports	Donor funds				
2.3.16. Update the	MoF-CA	MoI-	IV quarter of	Updated list of	List of indicators	Republic of Serbia				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
list of indicators for recognising suspicious transactions related to cross-border transportation of negotiable payment instruments whether reported or unreported to the MoF-CA		Border Police	2022	indicators	published	Budget - Regular costs of staff,				
2.3.17. Prioritisation of onsite inspections of all VASPs licensed by the supervisory authority within the first year of licensing, especially in the AML/CTF area (ongoing)	NBS, SC	MoI, APML, prosecutors' offices, supervisory inspection and other authorities	IV quarter of 2024	Onsite inspections carried out	Onsite inspection reports	Republic of Serbia Budget - Regular costs of staff				
2.3.18. Identify persons engaging in unauthorised provision of virtual asset services in the Republic of Serbia, and take action with respect to such	NBS, SC	MoI, APML, prosecutors' offices, supervisory inspection	IV quarter of 2024	Offsite inspections carried out	Offsite inspection reports	Republic of Serbia Budget - Regular costs of staff				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
persons (ongoing)		n and other authorities								
2.3.19. Improvement of the software for registering real estate lease and trade agents	MTTT	MTTT	IV quarter of 2023	Software improved	Report on software improvements	Republic of Serbia Budget - Regular costs of staff Donor funds				
2.3.20. Develop specific analyses of legal framework and situation in the accounting sector taking into account the findings of the national risk assessment	APML	APML, professional associations, supervisory authorities	IV quarter of 2022	Specific analyses carried out	Analysis reports	Republic of Serbia Budget - Regular costs of staff Donor funds				
2.3.21. Develop specific analysis of legal framework and situation in the sector of provision of games of chance in casinos and games of chance providers using electronic communications taking into account the findings of the national risk	Games of Chance Administration	GCA, SCCI, professional associations, supervisory authorities	IV quarter of 2022	Specific analyses carried out	Analysis documents	Republic of Serbia Budget - Regular costs of staff Donor funds				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
assessment										
2.3.22. Develop specific analyses of legal framework and situation in the real estate trade and lease agency sector taking into account the findings of the national risk assessment	MTTT	MTTT, SCCI, professional associations, supervisory authorities	IV quarter of 2022	Specific analyses carried out	Analysis documents	Republic of Serbia Budget - Regular costs of staff  Donor funds				
2.3.23. Develop specific analyses of legal framework and situation in the postal operators sector taking into account the findings of the national risk assessment	MTTT	MTTT, SCCI, professional associations, supervisory authorities	IV quarter of 2022	Specific analyses carried out	Analysis documents	Republic of Serbia Budget - Regular costs of staff  Donor funds				
2.3.24. Develop specific analyses of legal framework and situation in the authorised foreign currency operators sector taking into account the findings of the national risk assessment	NBS	NBS, APML, supervisory authorities	IV quarter of 2022	Specific analyses carried out	Analysis documents	Republic of Serbia Budget - Regular costs of staff  Donor funds				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
2.3.25. Intensification of advisory visits (ongoing)	MTTT - Team for supervision of postal operators	MTTT - Team for supervision of postal operators	IV quarter of 2024	Increased number of advisory visits	Report on the increased number of advisory visits	Republic of Serbia Budget - Regular costs of staff				
2.3.26. Enhanced oversight of compliance with the Law on Planning and Construction in relation to natural persons - investors in real estate (ongoing)	MCTI	MCTI	IV quarter of 2024	Number of inspections conducted	Report on conducted inspections	Republic of Serbia Budget - Regular costs of staff				
2.3.27. Improve the capacities of the Agency for the Prevention of Corruption in relation to the operation of the AML/CFT Law (identifying risk and suspicion on ML when verifying public officials' declarations on property and income)	APML	APML, ACAS	IV quarter of 2022	Number of training events held	Training reports	Donor funds				

**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 2022	Target value in 2023	Target value in 2024
Sustained progress 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

<b>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</b>							
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: 2022-2024				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 2022	Target value in 2023	Target value in 2024
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

Activity title:	Authority	Partner authorities	Deadline for	Indicator at the level of	Source of verification	Source of financing	Link to progra	Total assessed financial resources by source in RSD 000
-----------------	-----------	---------------------	--------------	---------------------------	------------------------	---------------------	----------------	---

	implem enting the activity	s in the implem entation of the activity	comple tion of activity	activity			mme budget	2022	2023	2024
3.1.1. Enter into new cooperation agreements between RPPO and other authorities concerning the exchange of data and information in relation to ML cases 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, ACAS, NPDIF, PPO, National Directorate for Property of the Republic of Serbia	II quarter of 2022	Number of agreements entered into	Reports on the agreements entered into	Republic of Serbia Budget - Regular costs of staff				
3.1.2. Prioritisation of money laundering cases in annual work plans and programmes of the Prosecutor's Office for Organised Crime and Higher Public Prosecutors' Offices of Belgrade, Kraljevo, Nis and Novi Sad, especially in cases where predicate crimes involve high-risk and high-value criminal offences (ongoing)	POOC, HPPOs in Belgrade, Kraljevo, Nis and Novi Sad	RPPO	IV quarter of 2024	Prioritisation completed	Annual work plans and programmes	Republic of Serbia Budget - Regular costs of staff				
3.1.3. Identification	HJC,		IV	Number of	Decision	Republic of				

Activity title:	Authority	Partner authority	Deadline for	Indicator at the level of	Source of verification	Source of financing	Link to progra	Total assessed financial resources by source in RSD 000		
and allocation of the required number of judges to special anti-corruption departments of the Higher Courts in Belgrade, Nis, Kraljevo and Novi Sad for efficient handling of ML cases (ongoing)	Higher Court in Belgrade, Kraljevo, Nis, Novi Sad		quarter of 2024	judges allocated to Special Departments	concerning the number of judges and Annual distribution of jobs and Work reports of the special anti-corruption departments	Serbia Budget - Regular costs of staff				
3.1.4. Updating of the MoI - General police directorate mandatory instruction concerning the consistent conduct of criminal prosecution against legal entities involved in ML/TF crimes (circular 03 No. 617/17 of 24.11.2017)	MoI General police directorate		II quarter of 2022	Updating completed	MoI mandatory instruction	Republic of Serbia Budget - Regular costs of staff				
3.1.5. Updating of the MoI - General police directorate instruction concerning the action to be taken upon learning that a crime has been committed and instruction concerning the financial investigative operational activities (instruction concerning the sharing of the assets of the suspect	MoI - General police directorate		II quarter of 2022	Updating completed	MoI mandatory instruction	Republic of Serbia Budget - Regular costs of staff				

Activity title:	Authority	Partner authority	Deadline for	Indicator at the level of	Source of verification	Source of financing	Link to progra	Total assessed financial resources by source in RSD 000		
and their related persons (03 No 231/17 of 19.04.2017)										
3.1.6. Establishment of permanent task forces for prosecuting stand-alone money laundering and third-party money laundering in special anti-corruption departments of the higher public prosecutors' offices of Belgrade, Kraljevo, Nis and Novi Sad, and in the Prosecutor's Office for Organised Crime for prosecuting professional money laundering.	POOC, Special AC departments of HPPO in Belgrade, Kraljevo, Nis and Novi Sad	MOF-TA-TPOL, MoF-CA, NBS, APML, SBRA, CSD, SAI, RGA, ACAS, NPDIF, NHIF, RSPD, PPA	IV quarter of 2022	Number of established permanent task forces	Decision establishing a permanent task force	Republic of Serbia Budget - Regular costs of staff				
3.1.7. Hold meetings to coordinate and prioritise the activities of supervisory, inspection and other relevant authorities and competent police units and competent public prosecutors' offices responsible for prosecuting the ML crimes (ongoing)	RPPO	POOC; HPPOs of Kraljevo, Belgrade, Nis, Novi Sad; MoI and supervisors	IV quarter of 2024	Number of meetings held	Meeting reports	Republic of Serbia Budget - Regular costs of staff				
3.1.8. Organise workshops to improve	JA	RPPO, SCC,	IV quarter	Number of workshops	Report on the	Donor funds				

Activity title:	Author ity	Partner authoritie	Deadli ne for	Indicator at the level of	Source of verification	Source of financing	Link to progra	Total assessed financial resources by source in RSD 000		
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). (ongoing)		POOC, Higher Prosecutor's Office Special Department, Higher Court Special Department MoI	of 2024	held	workshops held					
3.1.9 Advanced training and workshops on financial investigations, use of financial intelligence, analysis of the flows of money and goods in Serbia and internationally, and criminal organisation financial flow modelling, analysis of net value of assets, proving of the money laundering intent, stand-alone ML investigations (ongoing)	JA University of Criminal Investigation and Police Studies	General Public Prosecutor's Office, Prosecutor's Office for Organised Crime, Appellate Public Prosecutor's Office, Higher Court special AC departments, Supreme Court of Cassation, APPELLATE COURTA,	IV quarter of 2024	Number of training events and workshops held	Reports on the training events and workshops	Donor funds				

Activity title:	Authority	Partner authorities	Deadline for	Indicator at the level of	Source of verification	Source of financing	Link to program	Total assessed financial resources by source in RSD 000		
		Higher court special AC departments, MoI								
3.1.10. 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 (ongoing)	JA	General Public Prosecutor's Office, Prosecutor's Office for Organised Crime, Appellate Public Prosecutor's Office, Higher Court special AC departments, Supreme Court of Cassation, AC, Higher Court Special Department, MoI	IV quarter of 2024	Number of trainings delivered	Report on training delivered	Donor funds				

Activity title:	Authority	Partner authorities	Deadline for	Indicator at the level of	Source of verification	Source of financing	Link to progra	Total assessed financial resources by source in RSD 000		
3.1.11. Training for prosecuting legal entities as perpetrators of the ML criminal offence (ongoing)	JA, UCIPS	RPPO, POOC, APPO, Higher Prosecutor's Office Special Department, SCC, AC, Higher Court Special Department, MoI	IV quarter of 2024	Number of trainings delivered	Report on training delivered	Donor funds				
3.1.12. Development of the training plan and programme for all competent authorities in line with the findings of the analysis under the ML/TF NRA in the VA/VASP sector	MoI, Cybercrime PO,	JA, UCIPS, SCC AC, RPPO, AC, POOC, APML,	II quarter of 2022	Training programme developed	Training programme approved	Republic of Serbia Budget - Regular costs of staff				
3.1.13. Implementation of the training in the previous action item (ongoing)	UCIPS, JA	MOI, Cybercrime PO, SCC, AC, RPPO, AC, POOC, APML	IV quarter of 2024	Number of trainings delivered	Report on training delivered	Donor funds				
3.1.14. Training for police officers on new typologies, trends, methods of cooperation	MoI University of Crimina	APML and supervisors	IV quarter of 2024	Number of trainings delivered	Report on training delivered	Republic of Serbia Budget - Regular				

Activity title:	Authority	Partner authority	Deadline for	Indicator at the level of	Source of verification	Source of financing	Link to progra	Total assessed financial resources by source in RSD 000		
with AML/CFT supervisory authorities (ongoing)	Investigation and Police Studies					costs of staff				
3.1.15. Training of customs officers on typologies and trends of cross-border transportation of BNIs (ongoing)	University of Criminal Investigation and Police Studies	MoF-CA	IV quarter of 2024	Number of trainings delivered	Report on training delivered	Donor funds				
3.1.16. Passage of a new or amendments to the current Rulebook on Classification of Jobs in line with the assessment of HR capacities at special anti-corruption departments of Higher Pos in Belgrade, Novi Sad, Kraljevo and Nis	HPPOs in Belgrade, Nis, Novi Sad and Kraljevo	MoJ	II quarter of 2022	Rulebooks adopted	Rulebook on Classification of Jobs	Republic of Serbia Budget - Regular costs of staff				
3.1.17. Filling of vacancies in line with the Rulebook on Classification of Jobs of the POOC and special anti-corruption departments, HPPOs and HCs	HPPOs in Belgrade, Nis, Kraljevo and Novi Sad, RPPO,		IV quarter of 2022	Number of filled vacancies	Decisions on staff secondment and assignment, employment contracts	RS Budget				

Activity title:	Authority	Partner authority	Deadline for	Indicator at the level of	Source of verification	Source of financing	Link to progra	Total assessed financial resources by source in RSD 000		
	POOC									
3.1.18. Analysis of HR capacities of the Service for Combating Organised Crime, ML Suppression Section	MoI		II quarter of 2022	Analysis developed	Analysis of HR at Service for Combating Organised Crime, AML Department	Republic of Serbia Budget - Regular costs of staff				
3.1.19. Modification of the jobs classification document in line with the analysis	MoI		IV quarter of 2022	Jobs classification modified	Rulebook on Classification of Jobs passed	Republic of Serbia Budget - Regular costs of staff				
3.1.20. Filling of vacancies in line with the modified jobs classification under the item 3.1.17.	MoI		I quarter of 2023	Competition conducted, vacancies filled	Decisions on allocation of staff / Employment contracts	Republic of Serbia Budget - Regular costs of staff				
3.1.21. Purchasing of specialised software for monitoring cryptocurrency transactions	MoI	RPPO, APML, Cybercrime PO	III quarter of 2022	Software purchased	Contract and licence signed	Republic of Serbia Budget - Regular costs of staff Donor funds				
3.1.22. Delivery of training for using the specialised cryptocurrency transaction monitoring software	MoI		I quarter of 2023	Number of trainings delivered	Training reports	Donor funds				

**Measure 3.2: Imposing effective and deterring criminal sanctions**

Institution responsible for monitoring and control of implementation: Supreme Court of Cassation

Implementation period: 2022-2024			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 2022	Target value in 2023	Target value in 2024
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	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
3.2.1. Informing judges on international AML standards (FATF, MONEYVAL reports) (ongoing)	JA, APML	SCC, AC, Higher Court Special Departments in Belgrade, Kraljevo, Nis, Novi Sad	IV quarter of 2024	Number and type of activities aimed at informing judges with FATF recommendations and MONEYVAL reports	Activity reports	Donor funds				

3.2.2. Advanced training of judges for effective handling of main hearings and imposition of effective criminal sanctions in money laundering proceedings (ongoing)	JA	HJC, SCC, AC, Higher Court Special Departments in Belgrade, Kraljevo, Nis, Novi Sad	IV quarter of 2024	Number and type of training events	Court work reports and final court decisions	Donor funds				
3.2.3. Comparative analysis of ECHR case law and case law of EU countries and USA in terms of prosecuting and sanctioning the criminal offence of money laundering with a special focus on stand-alone and professional money laundering	SCC, AC, Higher Court Special Departments, RPPO, APPO, Higher Prosecutor's Office Special Department, POOC	Comparative Law Institute	IV quarter of 2022	Comparative case law analysis made	Analysis report	Donor funds				

3.2.4. Exchange of experiences through international study visits to countries with good track record in prosecuting the criminal offences of money laundering and asset recovery (good level of effectiveness on IO 7 and IO 8)	Supreme Court of Cassation , RPPO	AC, Higher Court Special Departments, POOC; APPO, Higher Prosecutor's Office Special Department	IV quarter of 2023	Decision on the countries with which to exchange experiences based on the findings of the comparative case law analysis; Meetings with the judicial authorities of the selected countries held	Study visit reports	Donor funds				
3.2.5. Annual analysis of Serbian case law on the criminal offence of money laundering and its publication in the SCC Bulletin. (ongoing)	SCC	Higher Court Special Departments, AC	IV quarter of 2024	Number of analyses and publication of case law	Bulletins and reports published	Republic of Serbia Budget - Regular costs of staff				

<b>Measure 3.3: Effective seizure/confiscation of proceeds from crime</b>							
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: 2022-2024				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 2022	Target value in 2023	Target value in 2024
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	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
3.3.1. Training of police officers and public prosecutors for more efficient identification of proceeds from predicate crime and assets with uncertain origin. (ongoing)	UCIPS, JA;	RPPO, MoI APPO Higher Prosecutor's Office Special Department, Service for Combating Organised Crime, Anti-Corruption Department	IV quarter of 2024	Number of training events held	Reports on the training held	Republic of Serbia Budget - Regular costs of staff  Donor funds				
3.3.2. Development of a practicum for tracing and efficient confiscation and recovery of illicit proceeds located in foreign countries by using international cooperation	RPPO MoI	SCC, AC, APPO, POOC, MoJ, Higher Prosecutor's Office Special	II quarter of 2023	Practicum developed and published	Practicum	Donor funds				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
mechanisms		Department, Service for Combating Organised Crime, Anti-Corruption Department								
3.3.3. Training of APML staff, police and public prosecutors for tracing and confiscating illicit proceeds located abroad by using the international cooperation tools, by using the Practicum referred to under item 3.3.2. (ongoing)	JA, UCIPS	RPPO, MOI, APML, POOC, Higher Prosecutor's Office Special Department, Service for Combating Organised Crime Anti-Corruption	IV quarter of 2024	Number of training events held	Report on the training held	Donor funds				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
		n Department								
3.3.4. Introduce procedures for managing the seized/confiscated digital assets by the Directorate for Management of Seized/Confiscated Assets	MOJ - DMSCA	NBS, SC	IV quarter 2024	Adopted procedures	Report on adopted procedures	Republic of Serbia Budget - Regular costs of staff				
3.3.5. Introduce procedures for managing seized motor vehicles by the Directorate for Management of Seized/Confiscated Assets	MOJ - DMSCA		II quarter of 2023	Adopted procedures	Report on adopted procedures	Republic of Serbia Budget - Regular costs of staff				
3.3.6. Delivery of training for assessment, security and store of value of proceeds from crime until the final court decision (ongoing)	JA	RPPO; POOC; MoJ-DMSCA; MoJ	IV quarter of 2024	Number of training events held	Report on the training held	Republic of Serbia Budget - Regular costs of staff Donor funds				
3.3.7. Analysis of the legal framework for seizure and	MoJ	RPPO, SCC, POOC	IV quarter of 2023	Analysis conducted	Analysis of legislative framework	Donor funds				

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
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		Court of Appeals (COA), APPO								
3.3.8 Regular reporting on criminal proceedings for money laundering and terrorism financing using digital assets (ongoing)	RPPO		IV quarter of 2024	Number of reports	Report, presentation	Republic of Serbia Budget - Regular costs of staff				

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 2022	Target value in 2023	Target value in 2024
Progress in achieving Immediate Outcomes 9-11 under FATF Methodology	Yes/No	Reports by competent authorities; Moneyval Report	Yes	2019	Yes	Yes	Yes

Measure 4.1: Ensure sustainability of the system of investigation 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: 2022-2024				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 2022	Target value in 2023	Target value in 2024
Suspicious entities checked	Percentage	Annual reports of competent state authorities	100%	2019	100%	100%	100%

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
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; (ongoing)	NCBT	RPPO, POOC, SIA, MoI, APML NSCCIP O	IV quarter of 2024	Exchanged data	Report about exchanged data	Republic of Serbia Budget - Regular costs 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;	POOC, SIA, MOI, APML	AML/CF T CB	II quarter of 2023	Analysis conducted	Analysis report made.	Republic of Serbia Budget - Regular costs of staff				
4.1.3. Adjust human, IT and financial capacities in line with the outcomes of the analysis under 4.1.2;	POOC, SIA, MOI, MOF	AML/CF T CB	IV quarter of 2023		Acts on job classification amended in accordance with the findings of the analysis	Republic of Serbia Budget - Regular costs of staff Donor funds				
4.1.4 Improve CFT cooperation with relevant international counterparts by concluding cooperation agreements; (ongoing)	MFA, APML, MoI, SIA, MIA, MSA, RPPO MoF-CA	CB (Secretariat)	IV quarter of 2024	Number of Cooperation agreements concluded	Cooperation agreements concluded	Republic of Serbia Budget - Regular costs of staff				
4.1.5 Analyse compliance of CFT provisions in the current Criminal Code with international standards	MoJ		II quarter of 2023	Analysis conducted	Analysis report made.	Republic of Serbia Budget - Regular costs of staff Donor funds				
4.1.6. Adjust the legal framework to the results of the analysis under 4.1.5;	MoJ		IV quarter of 2023	Normative framework amended in accordance with the findings of	Official Gazette of the Republic of Serbia	Republic of Serbia Budget - Regular costs of staff				

				the analysis						
4.1.7. Hold training events for the MoI Financial Investigations Unit on identifying TF activities; (ongoing)	MoI	University of Criminal Investigation and Police Studies (UCIPS);	IV quarter of 2024	Number of training events held	Report on the training held	Donor funds				
4.1.8. Hold training events of competent authorities based on best practices in terrorist financing cases; (ongoing)	JA, UCIPS	MOI, SIA, APML, POOC SCC Appellate courts	IV quarter of 2024	TRAINING	Report on training events held	Republic of Serbia Budget - Regular costs of staff  Donor funds				
4.1.9. Analysis of comparative case law in relevant EU countries, UK and USA concerning prosecution and sanctioning of TF criminal offence, through all <i>modi operandi</i> of the offence.	POOC Special Department of the Higher Court in Belgrade for Organised Crime; Appellate Court in Belgrade	JA, UCIPS	II quarter of 2023	Analysis conducted	Analysis report made	Donor funds				
4.1.10. Exchange of international experiences through study visits with countries which apply good practices in detecting and	POOC	MoI, SIA, APML	IV quarter of 2024	Number of study visits completed	Reports on study visits	Donor funds				

prosecuting TF criminal offence. (ongoing)										
--	--	--	--	--	--	--	--	--	--	--

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: 2022-2024				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 2022	Target value in 2023	Target value in 2024
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 remittance systems and off use of modern technologies conducted	Yes/No	Analysis	No	2019	No	Yes	

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
4.2.1 Hold continuous training of border police on identifying TF risks; (ongoing)	UCIPS	MoI MoF-CA	IV quarter of 2024	Number of training events held	Report on training events held	Republic of Serbia Budget - Regular costs of staff  Donor funds				
4.2.2 Hold continuous training of customs officers on identifying TF risks; (ongoing)	UCIPS	MoI MoF-CA	IV quarter of 2024	Number of training events held	Report on training events held	Republic of Serbia Budget - Regular costs of staff  Donor funds				

4.2.3. Introduce a list of indicators for recognising suspicious activities related to proliferation financing.	MoF-CA		I quarter of 2023	List of indicators introduced	List of Indicators	Republic of Serbia Budget - Regular costs of staff				
---	--------	--	-------------------	-------------------------------	--------------------	--	--	--	--	--

**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: 2022-2024 | 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 2022	Target value in 2023	Target value in 2024
Assessment of compliance with international standards, annually	a) non-compliant b) partially compliant c) largely compliant d) compliant	Report by competent authorities; Report of relevant international organisations	Framework is <i>largely compliant</i>	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	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024

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 and cooperation with non-profit organisations;	CB (Expert Team), Ministry of Human and Minority Rights and Social Dialogue (MHMRSD), MCI <sup>11</sup>	SBRA, NPOWG, APML, NPO sector (CSO)	IV quarter of 2024	Analysis conducted	Report on analysis conducted	Republic of Serbia Budget - Regular costs of staff  Donor funds				
4.3.2. Adjust the regulations according to the results of analysis under 4.3.1.	MHMRSD, MCI	NPO sector (CSO)	IV quarter of 2024	Regulations adjusted	Official Gazette of the Republic of Serbia	Republic of Serbia Budget - Regular costs of staff				
4.3.3. Develop a special analysis of NPO sector activities, in a participatory process, with the aim of mitigating the vulnerabilities from terrorism financing;	CB (Expert Team), MHMRSD, MCI	APML, SBRA, NPOWG, NPO Sector	IV quarter of 2023	Analysis conducted	Report on analysis conducted	Republic of Serbia Budget - Regular costs of staff  Donor funds				
4.3.4. Conduct supervision of NPOs, analyse results of the supervision conducted and make statistical reports on the examinations conducted; (ongoing)	CCIO	NPOWG	IV quarter of 2024	Number of inspections conducted	Report on inspections conducted	Republic of Serbia Budget - Regular costs of staff				

<sup>11</sup> It is important to note that there have been certain institutional changes since the adoption of the Strategy in 2020, so a change in stakeholders and partners should be analysed accordingly. For example, the activities in which MPALSG and OCCS participated, except for the activities related to supervisory inspection, shall be the purvey of the Ministry of Human and Minority Rights and Social Dialogue.

4.3.5 Where necessary, Update criteria and procedures for conducting supervision of NPOs , as well as methodology for inspectors; (ongoing)	CCIO	NPOWG	IV quarter of 2024	Criteria and procedures fro conducting supervision, as well as methodology for inspectors updated	NPOWG Work report	Republic of Serbia Budget - Regular costs of staff  Donor funds				
4.3.6 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; (ongoing)	MHMRSD, MCI	AML/CFT CB, NPO sector, donors, APML, MoI	IV quarter of 2024	Number of activities implemented (training events, round tables and conferences held; brochures issued, etc)	Report on activities implemented	Republic of Serbia Budget - Regular costs of staff  Donor funds				
4.3.7 Analyse current human, IT, and financial capacities of authorities relevant for registration and de-registration, record-keeping, supervision and cooperation with the NPO sector;	MPALSG-AI, MCI, MHMRSD, MinEcon-SBRA, MoF -TA	AML/CFT CB	I quarter of 2023	Analysis conducted	Report on analysis conducted	Republic of Serbia Budget - Regular costs of staff  Donor funds				
4.3.8. Improve the system and capacities of the authorities in accordance with the analysis under 4.3.7;	MPALSG-AI, MCI, MHMRSD, MinEcon-SBRA, MoF -TA		IV quarter of 2023	Capacities have improved.	Acts on job classification amended in accordance with the findings of the analysis	Republic of Serbia Budget - Regular costs of staff				

4.3.9. Deliver training for inspectors at institutions competent for supervising non-profit organisations; (ongoing)	CCIO	NPOWG AML/CFT CB, APML, MoI	IV quarter of 2024	Number of trainings delivered	Report on training events delivered	Republic of Serbia Budget - Regular costs of staff Donor funds				
4.3.10. Awareness raising on the importance of self-regulation in NPO sector; (ongoing)	MHMRS D MCI	NPO sector	IV quarter of 2024	Number of activities implemented with the aim of awareness raising on the importance of self-regulation in NPO sector	Report on activities implemented	Republic of Serbia Budget - Regular costs of staff Donor funds				
4.3.11. Awareness raising in NPO sector on legal ways of financial activities. (ongoing)	MCI	NBS, APML Bank Association MHMRS D	IV quarter of 2024	Number of activities implemented (training events, round tables and conferences held; brochures issued, etc) with the aim of awareness raising	Report on activities implemented	Republic of Serbia Budget - Regular costs of staff Donor funds				

<b>Measure 4.4: Improvement and efficient implementation of the legislative framework governing the prevention of terrorism financing</b>										
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: 2022-2024						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 2022	Target value in 2023	Target value in 2024			

Assessment of compliance with relevant international standards, annually	a) non-compliant b) partially compliant c) largely compliant d) compliant	Report by competent authorities; Report of relevant international organisations	Framework is largely compliant	2019	Largely compliant	Largely compliant	Largely compliant
--	--	--	--------------------------------	------	-------------------	-------------------	-------------------

Activity title:	Authority implementing the activity	Partner authorities in the implementation of the activity	Deadline for completion of activity	Indicator at the level of activity	Source of verification	Source of financing	Link to programme budget	Total assessed financial resources by source in RSD 000		
								2022	2023	2024
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	MFA	MoF, APML, MoJ	IV quarter of 2022	Analysis conducted	Analysis report made.	Republic of Serbia Budget - Regular costs of staff  Donor funds				
4.4.2 Modify the legislation, as required, in line with the outcomes of the analysis under 4.4.1;	MFA	MoF, APML, MoJ	I quarter of 2023	Legislation modified	Official Gazette of the Republic of Serbia	Republic of Serbia Budget - Regular costs of staff  Donor funds				
4.4.3. Analysis of legislative framework, its application and	CB (Expert Team)	NBS, APML, MTTT	II quarter of 2023	Analysis conducted	Analysis report made.	Republic of Serbia Budget - Regular				

current situation in the sectors identified as posing higher TF risk levels (e-money issuers, postal operators, payment institutions, etc.) in line with the outcomes of the NRA.						costs of staff Donor funds				
4.4.4. Pass indicators for recognising suspicious transactions related to terrorism (general and specific) and WMDPF while recognising specificities of each particular obliged entity;	Supervisory authorities		I quarter of 2023	Number and type of indicators	List of Indicators	Republic of Serbia Budget - Regular costs of staff Donor funds				
4.4.5. Development of training needs analysis for the private sector in line with WMDPF risk assessment findings;	APML	MoF-CA, MTTT, MFA, Supervisory authorities	II quarter of 2022	Analysis developed	Analysis report made.	Donor funds				
4.4.6. Develop a training programme and plan in accordance with the analysis under 4.4.5.;	APML	MoF-CA, MTTT, MFA, Supervisory authorities	III quarter of 2022	Training plan and programme developed	Report	Donor funds				
4.4.7. Deliver the training in accordance with the	APML	MoF-CA, MTTT, MFA,	IV quarter of 2024	Number of trainings delivered	Report on training events	Donor funds				

training programme under 4.4.6. (ongoing)		Supervisory authorities			delivered					
4.4.8. Development of training material, brochures, etc. based on WMDPF risk assessment findings (ongoing)	APML	MoF-CA, MTTT, MFA, Supervisory authorities	IV quarter of 2024	Number and type of training material items, brochures, etc.	Report on the implementation of the activity	Republic of Serbia Budget - Regular costs of staff Donor funds				
4.4.9. Delivery of training to authorities involved in regulating and cooperation with FIs in accordance with WMDPF risk assessment findings (ongoing)	APML	MFA, MTTT, APML, POOC, MoF-CA, MoI, supervisors	IV quarter of 2024	Number of trainings delivered	Report on training events delivered	Donor funds				
4.4.10. Exchange of experiences through study visits with countries which apply good practices in analysing suspicious transactions and other activities related to WMDPF (ongoing)	RPPO SCC	MoI, SIA, APML	IV quarter of 2024	Number of study visits completed	Report about experiences shared	Donor funds				
4.4.11. Hold training for the MoI Financial Investigations Unit on identifying WMDPF activities (ongoing)	MOI, UCIPS	MoF-CA	IV quarter of 2024	Number of trainings delivered	Report on training events held	Republic of Serbia Budget - Regular costs of staff Donor funds				

4.4.12. Development and distribution of a publication (glossary) of WMDPF terms	APML		II quarter of 2022	The number and manner of distribution of the publication	Publications published and/or distributed	Donor funds				
4.4.13. Raising awareness and improvement of knowledge of the relevant WMDPF stakeholders by translating the relevant international documents;	APML		IV quarter of 2022	Number of translated documents	Translated documents published/distributed	Donor funds				
4.4.14. Introduce IT solutions for implementing the lists of designated persons in relevant institutions;	MoF, MoF-CA, SBRA, RGA, MoI	AML/CF T CB	IV quarter of 2023	Number of IT solutions introduced	Work report	Republic of Serbia Budget - Regular costs of staff  Donor funds				
4.4.15. Improve the web-based application for searching designated persons and continue promoting its use (ongoing)	APML		IV quarter of 2024	Type and number (intensity) of modifications to the application	Improved application made operational	Republic of Serbia Budget - Regular costs of staff  Donor funds				

## VI LIST OF ABBREVIATIONS

<b>List of abbreviations</b>	
ACA	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
MCTI	Ministry of Construction, Transport and Infrastructure
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
MFA	Ministry of Foreign Affairs
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
CSO	Civil society organisations
JA	Judicial Academy
AMC	Appellate Misdemeanour Court
SCCI	Serbian Chamber of Commerce and Industry
ML/TF	Money laundering and terrorism financing
UCIPS	University of Criminal Investigation and Police Studies
MoF-TA-TPol	Tax Police
CommC	Commercial Court
MC	Misdemeanour court
MoF-TA	MoF - Tax Administration
RGA	Republic Geodetic Authority
NPOWG	Working Group for Supervision of NPOs
NRA WG	Working group for updating the National Risk Assessment
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

WMDPF	Financing of proliferation of weapons of mass destruction
CSD	Central Securities Depository and Clearing House (CSD)

## VII FINAL PROVISION

This Action Plan shall be published on the website of the Government of the Republic of Serbia, APML and e-Uprava portal no later than seven business days from the date of adoption.

This Action Plan shall be published in the Official Gazette of the Republic of Serbia.

05 Number: 011-2299/2022

In Belgrade, 17 March 2022.

GOVERNMENT

PRIME MINISTER

Ana Brnabić