

ANNUAL REPORT FOR 2024



**Council of Europe's Committee
on the Evaluation of Anti-money
Laundering Measures and
the Financing of Terrorism
(MONEYVAL)**

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

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(MONEYVAL)

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FREQUENTLY USED ABBREVIATIONS AND ACRONYMS

AML	Anti-money laundering
CEPs	Compliance Enhancing Procedures
CETS 198	2005 Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism – the Warsaw Convention
CFT	Countering the financing of terrorism
C198-COP	Conference of the Parties to the 2005 Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism – the Warsaw Convention (CETS 198)
CPF	Counter proliferation financing
DNFBP	Designated Non-Financial Businesses and Professions
EU	European Union
FATF	Financial Action Task Force
FIU	Financial intelligence unit
FSRB	FATF-Style Regional Body
FT	Financing of terrorism
FUR	Follow-up report
ICRG	International Co-operation Review Group of the FATF
IO	Immediate Outcome
IMF	International Monetary Fund
MER	Mutual evaluation report
ML	Money laundering
MLA	Mutual legal assistance
MONEYVAL	Council of Europe's Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism

NPO	Non-profit organisation
PACE	Parliamentary Assembly of the Council of Europe
PC-RAC	Committee of Experts on Criminal Asset Recovery
PDG	Policy and Development Group
PF	Proliferation Financing
R.	Recommendation
RTMG	Risk, Trends and Methods Group
SAR	Suspicious activity report
STR	Suspicious transaction report
TF	Terrorist financing
TFS	Targeted financial sanctions
VA	Virtual Asset
VASP	Virtual Asset Service Provider
WMD	Weapons of mass destruction

INTRODUCTION FROM THE CHAIR



I am pleased to present the 2024 annual report of the Council of Europe's MONEYVAL Committee, highlighting our key achievements over the past year. This marks my second opportunity to do as Chair of MONEYVAL, and I remain deeply committed to advancing our mission.

The global landscape continues to evolve, presenting both challenges and opportunities in our collective fight against money laundering, the financing of terrorism, and proliferation financing. In an era marked by geopolitical shifts, diminishing multilateralism and rapid technological change, our work – anchored in the rule of law and financial system integrity – has never been more vital. Our 2023–2027 Strategy continues to guide our efforts as we begin a new evaluation round, a round that will support our members in advancing tangible improvements in the effectiveness of anti-money laundering and counter-terrorist financing frameworks.

In close co-operation with international organisations and with national authorities, we continue to support Ukraine in strengthening its anti-money laundering and counter-terrorist financing frameworks, especially in response to the complex challenges stemming from full-scale invasion of Ukraine by the Russian Federation. At the 68th MONEYVAL Plenary, Ukraine presented updates on an ongoing project focused on identifying money laundering and terrorism financing trends and typologies linked to military conflicts, while also sharing best practices and potential risk-mitigation measures.

Across the wider MONEYVAL membership, jurisdictions have continued to make progress in implementing the Financial Action Task Force Standards. Notable improvements have been observed in areas such as risk understanding, international co-operation, and the use of financial intelligence. However, persistent shortcomings remain in several key areas, including supervision of the financial sector, private sector compliance, transparency of legal persons, effective investigation and prosecution of money laundering, asset recovery, and the implementation of targeted financial sanctions for terrorism and proliferation. MONEYVAL's peer review mechanism remains an indispensable instrument in encouraging and assisting jurisdictions to strengthen these critical components of their anti-money laundering and counter-terrorist financing systems.

Through active engagement in Financial Action Task Force initiatives, MONEYVAL has contributed to the evolution of international standards in several key areas. These efforts have led to important revisions and new guidance that will help support the development of more robust anti-money laundering and counter-terrorist financing measures worldwide.

Throughout 2024, MONEYVAL also deepened its collaboration with other Council of Europe bodies and relevant stakeholders, particularly where mandates and expertise intersect. One area of focus has been asset recovery – an area in which most countries continue still to face significant difficulties in adapting to the complexity and speed of modern criminal methods.

In line with the strategic vision to strengthen both vertical and horizontal co-operation with the Financial Action Task Force and fellow Financial Action Task Force-Style Regional Bodies, MONEYVAL was actively engaged in 2024 in preparing for the new round of global evaluations. That same year, MONEYVAL launched its 6th round of evaluations – becoming the first member of the Financial Action Task Force Global Network to begin the new cycle. This early leadership role comes with a pivotal responsibility: to set a high standard in the quality and rigour of our assessments, thereby guiding and shaping the evaluation work to follow across the Global Network. To kickstart this process, we relaunched our training programme to expand and upskill our pool of qualified assessors.

Co-ordination with the Financial Action Task Force continued to strengthen through joint initiatives efforts. Notably, MONEYVAL is contributing to a joint Financial Action Task Force-European Union-International Monetary Fund-MONEYVAL project focused on Ensuring a Consistent and Coherent Approach to European Union Supranational Measures. This initiative is designed to provide assessors with much needed guidance on technical compliance elements that are impacted by directly applicable European Union legislation. This project builds on MONEYVAL's EU Supranational Measures horizontal study, adopted in December 2024 which provides valuable insights to inform this work.

Looking ahead, our focus will be on advancing the new round of evaluations and delivering on the objectives under the Strategic Pillars set out in the

MONEYVAL 2023-2027 Strategy. Our core mission remains to strengthen anti-money laundering and counter-terrorist financing systems and their effectiveness in all MONEYVAL jurisdictions. At the same time, we will continue expanding MONEYVAL's regional reach, reinforce partnerships with European Union institutions, and broadening our engagement with the private sector and civil society.

The High-Level meeting held in Warsaw in 2023 marked a historic milestone in strengthening the political and ministerial commitment to anti-money laundering and countering the financing of terrorism at a critical time. As our member jurisdictions face new and evolving challenges, this heightened resolve will be essential to achieving lasting progress. To sustain our collective efforts and successfully deliver the Strategy's objectives, I call on all MONEYVAL member states and territories to demonstrate their commitment through continued financial voluntary contributions.

I would like to convey my sincere appreciation to our European and international partners for their ongoing support and collaboration. Our shared efforts to counter money laundering, terrorist financing and proliferation financing remain crucial in protecting the integrity of our financial systems and upholding an environment where the rule of law, human rights, and democratic values are a reality.

Nicola MUCCIOLI
MONEYVAL Chair

EXECUTIVE SUMMARY

The year 2024 marked a pivotal transition for the Council of Europe Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL), as it concluded the final assessments of the 5th round of mutual evaluations and became the first anti-money laundering (AML), countering the financing of terrorism (CFT), counter proliferation financing (CPF) assessment body worldwide to begin an evaluation under the new round, with the first on-site visit for Latvia taking place in November 2024. This shift offered an opportunity to take stock of the 5th round, the key findings of which are presented in section 1 below.

MONEYVAL completed its assessments of Jersey and Guernsey (United Kingdom Crown Dependencies) and Bosnia and Herzegovina, with the December 2024 MONEYVAL Plenary marking the conclusion of the 5th round of evaluations. These final evaluations reflected the diversity of progress achieved.

Jersey demonstrated a high level of effectiveness in understanding its money laundering (ML) and terrorist financing risks (TF) and in implementing comprehensive AML/CFT policies and strategies to mitigate them, and substantial effectiveness in the delivery of appropriate information, financial intelligence and evidence, and the facilitation of actions against criminals and their property, through: international co-operation; in the prevention of misuse of legal persons and arrangements for ML/TF, and in making available information on their beneficial ownership to competent authorities without impediments; in having asset recovery processes that lead to confiscation and permanent deprivation of criminal property and property of corresponding value; in the investigation of TF offences and activities and in the prosecution and sanctioning of persons who finance terrorism; in the prevention from raising, moving and using funds by terrorists, terrorist organisations and terrorist financiers; and in the prevention from raising, moving and using funds, consistent with the relevant United Nations Security Council Resolutions (UNSCR) by persons and entities involved in the proliferation of weapons of mass destruction (WMD).

Guernsey achieved high effectiveness in the prevention from raising, moving and using funds by terrorists, terrorist organisations and terrorist financiers and by persons and entities involved in the proliferation of WMD, although it demonstrated low effectiveness regarding the investigation of ML offences and activities and the prosecution and sanctioning of offenders.

Bosnia and Herzegovina showed moderate effectiveness in understanding its ML/TF risks; in international co-operation; in the supervision, monitoring and regulation of financial institutions and virtual asset service providers (VASPs), and of designated non-financial businesses and professions (DNFBPs); in the prevention of misuse of legal persons and arrangements for ML/TF; in the use of financial intelligence; in ML investigations and prosecutions; in the asset recovery processes; and in TF investigations and prosecutions. There was low effectiveness in the prevention from raising, moving and using funds by terrorist, terrorism organisations and terrorist financiers and by persons and entities involved in the proliferation of WMD, in addition to non-compliance in relation to non-profit organisations (NPOs), new technologies, and DNFBPs supervision. These shortcomings ultimately led to Bosnia and Herzegovina being placed in the list of jurisdictions under observation by the FATF International Cooperation Review Group (ICRG).

Overall, MONEYVAL's 5th round evaluated 33 jurisdictions across Europe and beyond. Key highlights include:

- ▶ Many jurisdictions improved their technical compliance ratings through the 5th round follow-up processes, with MONEYVAL follow-up reporting being among the highest among all assessor bodies in the FATF Global Network. According to FATF's consolidated list of ratings, 193 technical compliance upgrades were recorded in MONEYVAL jurisdictions compared with just 9 downgrades most of which were related to the identification and assessment of ML/TF risks that may arise in relation to the development of new products and new business practices, including new mechanisms and the use of new or developing technologies for new and pre-existing products.

- ▶ The 5th round featured deeper scrutiny of effectiveness outcomes. Members performed well in areas such as international co-operation, transparency of beneficial ownership and supervision of financial institutions. However, weaknesses remained in the investigation and prosecution of ML offences, the implementation of targeted financial sanctions (TFS), and the application of preventive measures and supervision of DNFBPs.
- ▶ Over the course of the 5th evaluation round, due to their performance level, 7 MONEYVAL jurisdictions were placed under FATF's list of jurisdictions under increased monitoring ("FATF *grey list*") and 20 jurisdictions were placed under MONEYVAL's enhanced follow-up. As of 2024, 3 MONEYVAL jurisdictions remain under increased monitoring by the FATF.

The conclusion of the 5th round therefore provided a valuable benchmark as MONEYVAL launched the 6th round of mutual evaluations in 2024, beginning with Latvia, Serbia, Slovenia, and Armenia. In parallel, the December 2024 EU Supranational Measures horizontal study - based on findings from MONEYVAL's 5th Round Mutual Evaluation Reports (MERs) provided a timely and insightful analysis of supranational elements that will enhance understanding of how such measures are implemented across jurisdictions and will inform future evaluations under the new round.

Throughout 2024, MONEYVAL member states and territories were subject to follow-up reports and compliance procedures. In 2024, MONEYVAL adopted the follow-up reports of Croatia, Estonia, Slovakia, Poland, Georgia, Monaco, San Marino, Gibraltar, the Republic of Moldova, Bulgaria, and Hungary. MONEYVAL member states and territories saw improvements in follow-up reports, with several jurisdictions being re-rated as Compliant or Largely Compliant on key FATF Recommendations. Monaco's first follow-up report in December demonstrated notable progress, with 15 FATF Recommendations ratings being upgraded. Gibraltar implemented all 40 Recommendations at a level of largely compliant or compliant and follow-up reporting was terminated. Separately, Gibraltar also exited the FATF *grey list* in 2024.

Five MONEYVAL member states were subject to Compliance Enhancing Procedures (CEPs) in 2024.

Slovenia and Lithuania exited CEPs as a result of targeted reforms, while MONEYVAL placed the Slovak Republic and Georgia under Step 1 of the CEPs,¹ underscoring the need for further efforts to strengthen their AML/CFT frameworks. Czechia's first report under Step 1 of CEPs was presented at the 68th MONEYVAL Plenary meeting. However, the Plenary decided to keep the country under Step 1, given the need for additional measures to be taken in relation to Recommendation (R.) 6 on TFS related to TF. Czechia is expected to report again in 2025 on further steps taken to address the identified shortcomings.

MONEYVAL's dual role – as both a Council of Europe Committee and a FATF-style regional body (FSRB) - was clearly demonstrated in 2024. At the Committee of Ministers' meeting in November, the FATF President acknowledged the strong and collaborative relationship between MONEYVAL, the Council of Europe and the FATF. MONEYVAL contributed actively to the FATF Global Network's priorities, particularly in the area of asset recovery, and began its collaboration on the FATF-led project on *Ensuring a Consistent and Coherent Approach to EU Supranational Measures*. MONEYVAL also worked closely with other divisions within the Council of Europe on shared priorities, including with respect to initiatives to combat manipulation of sports competitions and related ML activities as well as for the development of standards on asset recovery.

The path ahead demands continued engagement by all members – politically, financially and operationally. To successfully implement the objectives set out in the MONEYVAL 2023–2027 Strategy, including expanding typologies work and sustaining the pace and quality of evaluations, voluntary contributions from member states and secondment of experienced officials remain essential. Additional funding will enable the Secretariat to advance on the Strategy's key objectives and ensure the successful delivery of high-level initiatives and joint projects. MONEYVAL therefore invites and encourages further voluntary contributions to sustain the effectiveness and strategic impact of its work in the years ahead.

1. CEPs reports provide a general overview on whether a member has made progress addressing technical compliance deficiencies identified in the mutual evaluation reports or subsequent follow-up reports and to what extent.

1. STRATEGIC OUTLOOK

In 2024, MONEYVAL strategically positioned itself as a driving force in Europe’s fight against financial crime by deepening regional leadership, contributing to global alignment in the FATF Global Network, and reflecting on the closing of one round while aiming to set a strong benchmark with the quality of MONEYVAL assessments and training in the new round. MONEYVAL published a landmark study on EU supranational AML/CFT measures in 5th round MERs and advanced cutting-edge research into ML risks linked to armed conflict and emerging technologies.

As the first member of the Global Network to begin the new evaluation cycle, MONEYVAL took on a pivotal responsibility in addition to preparing for a joint FATF-MONEYVAL Plenary in 2025. Within the Council of Europe, MONEYVAL contributed to new legal tools for asset confiscation in the form of the preparation of an additional protocol to the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS No. 198) and expanded synergies through cross-departmental co-operation. Even as it called for greater member commitment and resources – including a push for voluntary contributions – MONEYVAL’s work showcased that with the

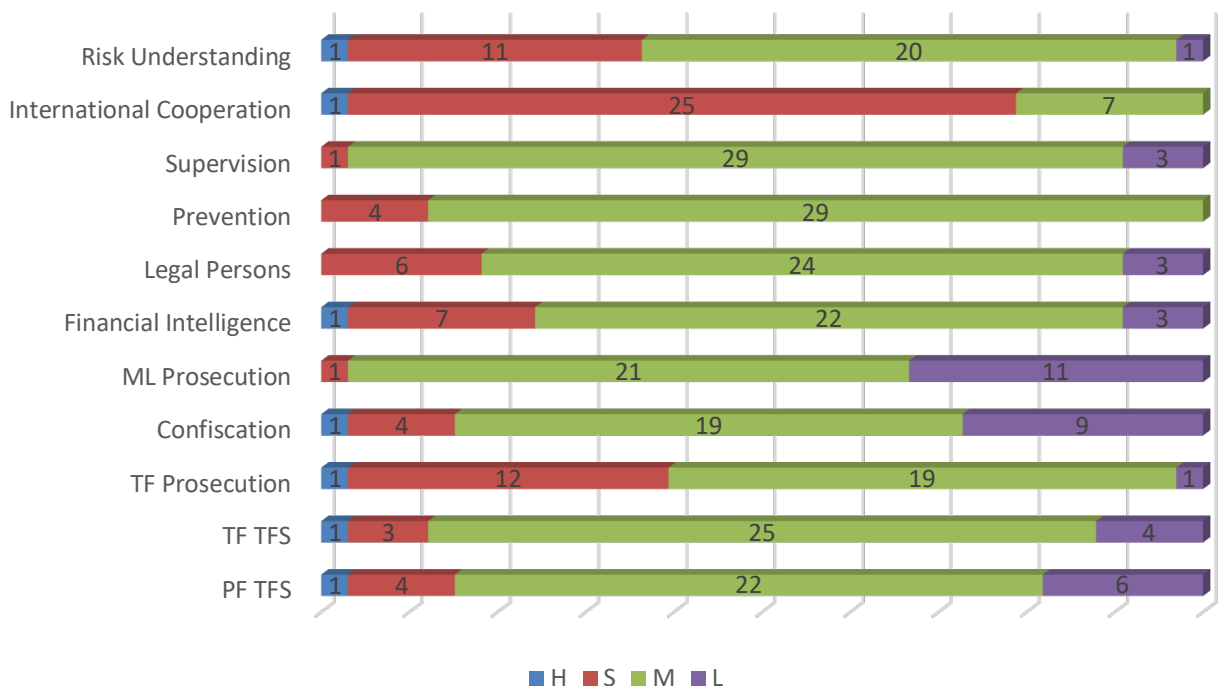
right support, it can lead the charge in safeguarding financial systems and protecting the broader economy from the ML/TF and proliferation financing (PF) threats, thereby strengthening financial sector integrity and safety and security across the membership.

1.1. COMPLIANCE TRENDS

2024 marked the conclusion of the 5th round of mutual evaluations, offering a valuable opportunity to take stock of the progress achieved under this round and reflect on both key achievements and persistent challenges.

In this section, we examine how MONEYVAL’s member jurisdictions have measured up against the FATF Standards, drawing on the findings of MONEYVAL’s MERs. These reports assess how effectively countries are tackling ML and TF and whether they are achieving the intended outcomes. The observations presented here reflect the results of the 5th round, including the ratings assigned to jurisdictions based on their performance within the FATF’s rigorous AML/CFT evaluation framework.

Fig 1: Overview of Effectiveness Compliance Ratings (33 MERs)



Overall, MONEYVAL member states and jurisdictions performed well in several critical areas, as reflected in the effectiveness ratings across the 33 MERs adopted under the 5th round. Notably, there was a strong performance in international co-operation (IO2), with the vast majority of jurisdictions – 25 in total – rated as having a substantial level of effectiveness, and one jurisdiction rated highly effective. Similarly, understanding of risks (IO1) yielded encouraging results, with 11 jurisdictions reaching a substantial level and one rated high as well as TF investigation and prosecution (IO9), with 12 jurisdictions reaching a substantial level and one rated high. However, the evaluations revealed a more moderate picture in several other areas. In supervision (IO3), use of financial intelligence (IO6), and preventive measures applied by financial institutions (FIs) and DNFBPs (IO4), most jurisdictions achieved only moderate ratings, with a few rated low. Serious challenges remain in the areas of ML investigation and prosecution (IO7), asset confiscation (IO8), and the implementation of TFS for TF (IO10) and PF (IO11), where a significant number of jurisdictions received moderate or low ratings. While these results point to a general awareness of risk and efforts to improve co-operation, they also underscore the need for continued investment in operational capacity and strategic enforcement to achieve more consistent and effective outcomes. The following sections provide a more detailed analysis of compliance trends observed during the 5th evaluation round across MONEYVAL membership.

Risk Understanding (IO1)

As MONEYVAL concluded the final assessments of its 5th round of mutual evaluations, the results under IO1 offered a critical snapshot of jurisdictions' ability to identify, understand, and respond to ML/TF risks. Risk understanding is the cornerstone of an effective AML/CFT system, enabling government authorities to identify high-risk areas, allocate resources strategically, and apply proportionate controls.

All member jurisdictions carried out one or more national risk assessments during the 5th round. Nevertheless, only 11 jurisdictions (approximately 33%) were rated as having a substantial level of effectiveness, with just one achieving a high rating. These ratings reflect the existence of comprehensive risk assessments, a sound understanding of ML/TF threats, and the adoption of risk-based action plans supported by co-ordination mechanisms. However, persistent shortcomings were observed across most jurisdictions, particularly in relation to the depth of analysis concerning legal persons, terrorist financing exposure (including NPOs), and cash-based economies. Moreover, MERs frequently highlighted the need for more detailed ML/TF statistics and broader

engagement of the private sector in national risk assessment processes.

International Co-operation (IO2)

MONEYVAL's findings under IO2 in the 5th round showcase the importance of international co-operation, a critical component of any AML/CFT system due to the transnational nature of ML/TF threats. The timely sharing of intelligence and evidence, both informally and formally through mutual legal assistance (MLA) or extradition helps build a more complete picture of illicit operations.

MONEYVAL's findings under IO2 reflect a generally strong performance by jurisdictions in the area of international co-operation. Throughout the round, 80% of assessed countries received a positive rating, with 25 jurisdictions rated substantial and one achieving a high level of effectiveness. These countries were found to actively engage in both the provision and request of international co-operation, consistent with their respective risk profiles. They had also established the legal, procedural, and operational frameworks necessary to facilitate timely and constructive exchanges. While all competent authorities were involved in international co-operation efforts, the engagement of supervisory authorities was comparatively limited. Minor deficiencies identified – such as weaknesses in case management systems or prioritisation protocols, were not assessed as materially impacting effectiveness.

Supervision (IO3)

AML/CFT supervision has a central role in ensuring the effective assessment and management of ML/TF risk and compliance with AML/CFT preventive measures. Through regular monitoring, inspections, and enforcement, supervisors help to verify that institutions have strong internal controls, conduct proper customer due diligence (CDD), report suspicious transactions, and comply with legal obligations.

Findings under IO3 highlighted persistent structural weaknesses in AML/CFT supervision across most jurisdictions. Only one country achieved a positive rating under IO3. Most jurisdictions were found to have implemented basic licensing controls to limit criminal access to the financial system. However, significant vulnerabilities remained, particularly in relation to DNFBPs, where entry controls were often lacking or inadequate. Nearly two-thirds of assessed jurisdictions were advised to strengthen their licensing and registration regimes for these sectors.

The application of a risk-based approach to supervision also proved insufficient. While financial institution supervisors have a generally adequate understanding of ML/TF risks, this was notably weaker among DNFBP supervisors, particularly in relation to terrorist

financing. In most cases, the limited development of sector-specific and institutional risk assessments hindered effective oversight. Although efforts to introduce or enhance such assessments were underway in some jurisdictions, the overall level of institutional risk understanding remained low, especially among DNFBP supervisors.

Supervisory activity was also found to be limited in scope and intensity. On-site inspections were insufficient, and enforcement mechanisms, particularly the application of sanctions, were rarely used or lacked dissuasive effect. MERs consistently pointed to the need for more robust and risk-based supervision, along with significant improvements in the enforcement of AML/CFT measures.

Preventive Measures (Private Sector) (IO4)

The conclusion of the 5th round of mutual evaluations provided a clear picture of the challenges faced by MONEYVAL jurisdictions in implementing preventive measures within the private sector – a frontline defence in the fight against ML/TF. Private sector compliance with AML/CFT obligations not only protects their own operations from abuse but also supports national and international efforts.

Under IO4, effectiveness remained limited overall, with only five countries receiving positive ratings. In those jurisdictions, FIs and the more material DNFbps demonstrated a reasonable grasp of their ML/TF risks and obligations, alongside an adequate application of CDD requirements. Nonetheless, even among these better-performing countries, issues such as underreporting, particularly among non-banking FIs and DNFbps, and limited risk understanding among DNFbps continued to surface, though to a lesser extent than in jurisdictions with moderate ratings.

In most other countries, weak performance by DNFbps significantly affected overall outcomes, with FIs generally showing only partial effectiveness. The three MERs adopted in 2024, all of which resulted in moderate ratings, revealed persistent gaps: insufficient verification of beneficial ownership information, especially among non-bank institutions, limited application of enhanced due diligence (EDD) for politically exposed persons (PEPs), poor implementation of risk-based measures, and low levels of suspicious transaction reporting, particularly across the non-banking sector.

Transparency of Legal Persons and Arrangements (IO5)

The 5th round of mutual evaluations provided key insights into how MONEYVAL jurisdictions ensure transparency in the ownership and control of legal persons and arrangements. Although the ML/TF risks vary significantly among different MONEYVAL

jurisdictions, the transparency of legal persons and arrangements remains crucial in combating ML/TF because these structures are often misused to hide the identity of the true beneficiaries of illicit funds.

Effectiveness under IO5 was generally moderately effective. Among the countries assessed in 2024, three adopted the approach to implement beneficial ownership registers as a mechanism to ensure access to beneficial ownership information. All three countries assessed in 2024 had publicly available information on the creation and types of legal persons and arrangements. Two countries had a good understanding of the ML risks of corporate structures as a result of having comprehensively assessed the ML risk associated with the misuse of legal persons. Nonetheless, there were shortcomings in relation to assessing TF risks and more complex structures. This is reflective of wider findings across MONEYVAL jurisdictions. Most countries have several measures in place to prevent the misuse of legal persons and arrangements, which includes basic and beneficial ownership information on legal persons held via registries, obliged entities that interact with legal persons, and the legal persons themselves. 18 of the 33 jurisdictions evaluated during the round had established beneficial ownership registers by the time of their on-site visits. However, these efforts have yet to reach full effectiveness. In most cases, the registers were not fully populated, and the mechanisms to verify the accuracy and reliability of the information were found to be underdeveloped. These shortcomings continue to limit the utility of beneficial ownership data for law enforcement and intelligence authorities in pursuing ML/TF cases involving complex corporate structures.

Use of Financial Intelligence (IO6)

The end of the 5th round of mutual evaluations allowed for a consolidated view of how MONEYVAL jurisdictions utilise financial intelligence as part of their AML/CFT efforts. The use of financial intelligence is vital in the fight against ML/TF because it helps identify suspicious patterns, trace illicit financial flows, and uncover networks behind criminal activities. This intelligence supports effective investigations, informs policy decisions, facilitates international co-operation, and enables both preventive and enforcement actions.

Results from the 5th round revealed mixed performance under IO6. Eight jurisdictions received positive ratings, one high and seven substantial, demonstrating strong co-operation between Financial Intelligence Units (FIUs) and law enforcement authorities. In these cases, access to a broad range of information enabled systematic use of financial intelligence, with FIU outputs contributing meaningfully to investigations. Suspicious transaction and activity reporting was generally aligned with national risk profiles, and a substantial portion of reports were deemed useful.

Nonetheless, even among jurisdictions rated substantial, shortcomings were observed. These included low levels of reporting in certain sectors, limitations in the quality or relevance of strategic analysis, and capacity constraints. Jurisdictions with weaker ratings tended to use financial intelligence in a more restricted manner, often focusing on predicate offences rather than ML itself. These limitations were frequently linked to insufficient analytical expertise, limited resources, and weak FIU output. A recurring issue was the low volume and poor quality of suspicious transaction and activity report (STRs/SARs). All three countries assessed in 2024 received moderate ratings, reflecting the presence of most of these challenges.

Money Laundering Investigations, Prosecutions, and Convictions (IO7)

The completion of the 5th round of mutual evaluations highlighted how ML offences are investigated, prosecuted, and adjudicated, a critical component of effective AML/CFT efforts and a key deterrent to future crimes. Demonstrating tangible enforcement is also vital to reassuring both domestic and international stakeholders that a country's AML/CFT regime is not only established in law but being actively and effectively enforced.

The 5th round revealed a persistent gap across MONEYVAL jurisdictions between the capacity to investigate ML and the ability to secure convictions, particularly in complex cases or when ML is prosecuted as a stand-alone offence. While most jurisdictions have the necessary legal tools and frameworks necessary to prosecute ML offences, the common practice of anchoring prosecutions to an underlying predicate offence remains widespread. This investigative focus, coupled with the limited use of financial investigations and resource constraints, has contributed to a significant disparity: a comparatively high number of ML investigations contrasted with much lower rates of prosecutions and convictions. Of the jurisdictions assessed in 2024, 21 received moderate ratings, and 1 received a high rating for IO7, underscoring the structural and operational challenges that continue to hinder the effective prosecution of ML cases.

Confiscation of Proceeds of Crime (IO8)

The 5th round showcased the extent to which MONEYVAL jurisdictions are able to deprive criminals of the proceeds of their illicit activities. Confiscating these assets not only serves as a form of punishment; but also disrupts the financial incentives behind criminal behaviour and prevents those funds from being reinvested into further criminal activities.

Findings under IO8 revealed limited effectiveness across jurisdictions. Confiscation outcomes remained modest overall when compared to the estimated scale of criminal proceeds, particularly in relation

to the number of prosecutions and convictions for proceeds-generating offences. Only five jurisdictions (15%) achieved positive results, with one assessed as highly effective. These countries shared key features: significant amounts of assets ultimately confiscated, the routine conduct of parallel financial investigations, proactive use of confiscation tools, seizure of assets consistent with identified risks, the ability to confiscate assets both domestically and abroad, and the existence of asset management systems to support the process.

Nevertheless, even among these jurisdictions, challenges persisted. Weaknesses included the absence of measures to confiscate falsely declared or undeclared cash movements and significant gaps between amounts seized and ultimately confiscated. 19 countries evaluated in 2024 received moderate ratings, 4 substantial ratings, and 1 high rating, reflecting the need for broader and more consistent implementation of confiscation measures.

Terrorist Financing Investigations, Prosecutions, and Convictions (IO9)

Findings under MONEYVAL's 5th round of mutual evaluations illustrated how jurisdictions investigate, prosecute, and secure convictions for TF offences. Effective enforcement is critical for AML/CFT efforts as it plays a key role in detecting, disrupting, and dismantling the financial networks that enable and support terrorist activities.

IO9 findings reflected a relatively strong performance, though important shortcomings remain. Approximately 40% of assessed jurisdictions received positive ratings, including two of the countries evaluated in 2024. These jurisdictions generally displayed a solid understanding of their TF risks and undertook awareness-raising measures directed at CFT authorities. FIUs played a supporting role in identifying and investigating TF cases, and in certain instances, prosecutions led to convictions for various types of TF offences. Where such outcomes were not present, the absence of action was assessed as consistent with the country's risk profile.

The 5th round also revealed ongoing challenges. In some jurisdictions, authorities did not proactively explore the financial dimension of terrorism-related cases. Common weaknesses included a low number and limited quality of STRs, insufficient monitoring of wire transfers to and from high-risk jurisdictions, and limited analysis of TF risks linked to foreign terrorist fighters, money or value transfer services, the non-profit sector, and cross-border cash flows.

Among the countries assessed in 2024, two were rated substantial and one moderate. While these jurisdictions demonstrated a fair understanding of TF risks, all three were advised to further strengthen investigative

capacity, provide clearer guidance to operational authorities, and allocate additional resources. In each case, the limited number of TF-related STRs/SARs, even within high-risk sectors, highlighted persistent difficulties for reporting entities in detecting and reporting TF suspicions effectively.

Targeted Financial Sanctions (Terrorist Financing & Proliferation Financing) (IO10 & IO11)

The conclusion of the 5th round of mutual evaluations provided a final opportunity to assess the capacity of MONEYVAL jurisdictions to implement TFS related to TF and PF. Effective implementation in this area is crucial in preventing persons and entities involved in terrorism, terrorist financing, or the proliferation of WMD from raising, moving or using funds.

Findings across the round pointed to widespread deficiencies. A large majority of countries received moderate or low ratings: 88% for IO10 and 85% for IO11. Nearly half of the jurisdictions assessed lacked effective mechanisms to ensure the timely and uninterrupted implementation of TF- and PF-related sanctions.

The three countries assessed in 2024 reflected the overall variability in performance under these outcomes. One jurisdiction was rated highly effective, another substantial, while the third received a low rating, underscoring persistent disparities in the operationalisation and effectiveness of TFS frameworks across the region.

1.2. MONEYVAL STRATEGY ON ANTI-MONEY LAUNDERING, COMBATING THE FINANCING OF TERRORISM AND PROLIFERATION FINANCING (2023-2027)

Significant and well-designed collective efforts across many years are needed to ensure visible progress in enhancing the effectiveness of national, regional and global AML/CFT efforts. This is why MONEYVAL adopted its first Strategy in 2020 for the period 2020-2022, with the overall goals of strengthening the capacities of MONEYVAL members, enhancing MONEYVAL's involvement in the global AML/CFT network, strengthening MONEYVAL's political standing, and increasing resources.

MONEYVAL's 2023–2027 Strategy, endorsed at its April 2023 Warsaw ministerial meeting, is centred around six key strategic pillars (see section 7) which are more ambitious and expansive than the 2020-2022 period – which is a testament to MONEYVAL's growing scope of work. The objectives that make up the respective pillars either relate to MONEYVAL's core work (basic objectives) or are more aspirational (development objectives) and together provide a roadmap for the

vision of MONEYVAL's work. This Strategy aims to ensure that MONEYVAL can increase its contribution to global AML/CFT efforts through concrete results.

These should also be read in light of the strategic priorities endorsed by FATF Ministers in April 2024².

In 2024, MONEYVAL made substantial progress on pillar one while steadily advancing on the other pillars. Highlights of the work done under pillar one (Continuing and Enhancing MONEYVAL's Monitoring Programme) include the successful conclusion of the 5th round of mutual evaluations in 2024, the initiation of the 6th round of evaluations, initiation of work for the joint FATF-MONEYVAL Plenary in 2025 and three assessor training events in 2024. The publication of a EU Supranational Measures horizontal study in December 2024 emphasised MONEYVAL's regional leadership and its role as a reference point on AML/CFT implementation. Whilst the detailed overview of the Strategy's implementation is provided under Chapter 7, several highlights from 2024 activities are summarised below.

1.2.1. Launch of the 6th round

In 2024, MONEYVAL commenced its 6th round of mutual evaluations, being the first in the Global Network to carry out an assessment in the new evaluation round.

The round officially began with an on-site visit to Latvia (4–15 November 2024), where MONEYVAL evaluators along with experts from FATF jurisdictions, conducted in-depth discussions with representatives from competent authorities, including government, supervisory bodies, FIUs, law enforcement, and private sector stakeholders in Riga. The MER for Latvia was subsequently adopted at the joint Plenary meeting of MONEYVAL and FATF in June 2025.

The 6th round was also initiated for Serbia, Slovenia, and Armenia.

1.2.2. EU Supranational Measures

MONEYVAL has been a strong leader in developing a consistent understanding for the assessment of supranational measures. In December 2024 MONEYVAL published the EU Supranational Measures horizontal study that analysed how EU supranational measures were considered and weighted in the MONEYVAL 5th round mutual evaluations. More than a third of MONEYVAL member jurisdictions are EU member states, while several other MONEYVAL members have committed to harmonise their legislation with the EU's AML/CFT acquis.

² FATF Ministers commit to stepping up efforts to fight money laundering, terrorist and proliferation financing

The FATF project on ensuring a coherent approach to EU supranational measures began in 2024, with MONEYVAL playing a central role. While MONEYVAL's EU Supranational Measures horizontal study focused on how these measures were assessed under the 5th round, the FATF-led project is forward looking and designed for the application of the new round. Its primary goal is to provide assessors with clear and practical guidance on technical compliance elements that are impacted by EU Supranational Measures. Insights from Latvia's mutual evaluation in 2024 have already contributed to this project. As the project continues, MONEYVAL will aim to maintain this feedback loop, ensuring that future evaluations of EU member states which are MONEYVAL members continue to inform and refine the guidance and trainings on supranational measures.

1.2.3. Typologies

In 2024, work proceeded on one of the typologies relating to developing a research-based understanding of major ML/TF trends and underlying rule of law and economic factors – the “Proceeds and Conflicts”

typology project. Led by Ukraine, this project aims to identify ML trends and typologies that arise from military conflicts, including the misuse of crowdfunding, virtual assets (VA), online payment systems, and the trans-shipment of dual-use goods to generate funds or assets for sustaining conflicts. In 2024 a decision was made to extend the research period and scope to ensure comprehensive findings, and incorporate additional case studies, with the final draft report to be delivered in 2025.

In December 2024, MONEYVAL approved the Isle of Man initiative to update the previous typology on VAs, with a specific focus on their use to evade financial sanctions, in order to evaluate sanctions circumvention methods, assess the effectiveness of R. 15 and the travel rule, and identify best practices for competent authorities.



2. MUTUAL EVALUATIONS AND FOLLOW-UP

2.1. 5TH ROUND MUTUAL EVALUATION REPORTS

The conduct of mutual evaluations is MONEYVAL's core mandate. The 5th Round mutual evaluation programme proceeded as scheduled in 2024, with MERS adopted at the 67th MONEYVAL Plenary in May 2024 for the United Kingdom Crown Dependency of Jersey, and at the 68th MONEYVAL Plenary in December 2024 for Bosnia and Herzegovina and the United Kingdom Crown Dependency of Guernsey. These adoptions

marked the successful conclusion of MONEYVAL's 5th round of evaluations, which started in 2015 and ended in 2024.

The table below lists the member jurisdictions and other Global Network partners that contributed assessors and reviewers to MONEYVAL's evaluation processes in 2024. Their dedication and valuable contributions are greatly appreciated and have been instrumental in supporting the success of MONEYVAL's work.

Fig 2: States and Territories' Contributions to Evaluation Processes

Evaluated Country	Assessment Team Members	Reviewers
Bosnia and Herzegovina	Andorra, Isle of Man, Malta, Montenegro, Poland, Romania, Serbia	Slovenia, FATF Secretariat, Guernsey, Hungary
Jersey (United Kingdom Crown Dependency)	Armenia, Luxembourg, Georgia, Malta, Poland, South Africa	FATF Secretariat, Latvia, Liechtenstein
Guernsey (United Kingdom Crown Dependency)	Czechia, Hungary, Malta, Republic of Moldova, Morocco	FATF Secretariat, Monaco, Romania

2.1.1. 5th round mutual evaluation report of Jersey (United Kingdom Crown Dependency)



The United Kingdom Crown Dependency of Jersey’s MER was adopted at MONEYVAL’s 67th Plenary in May 2024, with the on-site mission to the jurisdiction having taken place between 27 September to 10 October 2023.

Jersey demonstrated a high level of effectiveness in understanding its ML/TF risks and has implemented comprehensive AML/CFT policies and strategies to mitigate them. MONEYVAL commended the jurisdiction for its detailed risk assessments and strong co-ordination between agencies and the private sector. However, the report recommended further improvements in the implementation of risk-based AML/CFT measures, particularly regarding complex legal structures and PEPs.

ML investigations and prosecutions were found to be functional but required greater proactivity, especially in pursuing third-party ML and autonomous ML cases. MONEYVAL acknowledged the effective use of alternative measures, such as civil forfeiture mechanisms and deferred prosecution agreements, but recommended a more assertive approach to ML convictions. The confiscation of proceeds of crime was considered a policy priority, but authorities were encouraged to increase their efforts in high-risk cases.

Jersey’s understanding of TF-related risks was assessed as strong, with well-established mechanisms for identifying and investigating TF threats. While the jurisdiction has a low risk profile for TF, MONEYVAL advised authorities to further strengthen supervision of TFS and risk-based oversight of the non-profit sector to prevent potential vulnerabilities.

The AML/CFT supervisory framework was considered robust for financial institutions, with supervisors demonstrating a strong risk understanding. However, MONEYVAL noted that the enforcement of sanctions for non-compliance remains moderate, calling for a more proactive approach to ensure effective deterrence. Additionally, the report recommended enhancing criminality checks for market entry requirements.

Jersey was praised for its transparency measures, particularly in ensuring adequate and up-to-date beneficial ownership information. However, further improvements in the private sector’s implementation of EDD measures and suspicious transaction reporting were encouraged.

MONEYVAL found that Jersey’s international co-operation mechanisms were effective, with authorities actively engaging in MLA and information sharing. The report suggested that Jersey should further increase informal co-operation and outreach to foreign counterparts.

Jersey shall report back to MONEYVAL under its regular follow-up reporting process in December 2026.

Fig 3: Mutual Evaluation Effectiveness Ratings – Jersey (United Kingdom Crown Dependency)

IO1	IO2	IO3	IO4	IO5	IO6	IO7	IO8	IO9	IO10	IO11
HE	SE	ME	ME	SE	ME	ME	SE	SE	SE	SE



2.1.2. 5th round mutual evaluation report of Bosnia and Herzegovina



The MER for Bosnia and Herzegovina was adopted at MONEYVAL's 68th Plenary in December 2024, with the on-site mission to the country having taken place between 12 and 28 February 2024.

Overall, Bosnia and Herzegovina displayed moderate effectiveness in nine of the eleven areas assessed. Bosnia and Herzegovina generally demonstrated a good understanding of its ML risks. However, there are limitations in the understanding of TF risk and the report recommends that the authorities should deepen their understanding of threats and vulnerabilities in a number of areas.

Although there is a good level of co-operation and communication between the competent authorities, there are concerns with the effective use of the FIU in the overall AML/CFT system in Bosnia and Herzegovina. Amongst other matters, the report encourages greater alignment between spontaneous FIU dissemination and the country's risk profile.

A number of ML investigations and prosecutions have been initiated and convictions achieved which are partially in line with the country's risk profile. However, there are limitations in the effectiveness of the system.

MONEYVAL recommended establishing a clear policy to prioritise the identification, investigation and prosecution of ML offences in order to increase the number of cases in line with the risk profile of the country and overcome undue delays in criminal proceedings. The report also called for the authorities to pursue existing strategic goals for asset recovery, including creating

an effective asset management mechanism at the state level and establishing a special prosecutor's department to tackle organised crime and corruption at the federation level.

Given the TF risk profile of the country, the number of prosecutions is not in line with risk profile. Moreover, limited understanding of the TF offence is an impediment to achieving effectiveness. There were also fundamental deficiencies related to implementation of TFS. The report recommends that the authorities should develop an understanding and interpretation of the TF offence in line with the national law and international standards, and that TF cases should be proactively pursued on a timely basis.

Bosnia and Herzegovina made progress in strengthening its AML/CFT supervisory system, particularly for the banking and financial sectors. However, major gaps persist in the supervision of higher-risk non-financial sectors, including notaries and lawyers. MONEYVAL recommended that DNFBP supervisors should continue to develop their overall understanding of risks, where work has already started in this respect. The report also calls for policy and operational co-ordination linked to the transparency of legal persons.

Bosnia and Herzegovina has a sound legal framework enabling provision of MLA and extradition in relation to ML, associated predicate offences and TF and assistance is provided in a constructive manner. However, the nature of MLA sought only partially corresponds with areas identified as presenting a higher threat in national risk assessments.

Bosnia and Herzegovina shall report back to MONEYVAL under its enhanced follow-up reporting process in December 2026.

Fig 4: Mutual Evaluation Effectiveness Ratings – Bosnia and Herzegovina

IO1	IO2	IO3	IO4	IO5	IO6	IO7	IO8	IO9	IO10	IO11
ME	ME	ME	ME	ME	ME	ME	ME	ME	LE	LE



2.1.3. 5th round mutual evaluation report of Guernsey (United Kingdom Crown Dependency)



The MER for Guernsey was adopted at MONEYVAL's 68th Plenary in December 2024, with the on-site mission to the jurisdiction having taken place between 15 to 26 April 2024.

Guernsey demonstrated a sound understanding of its ML/TF risks and has strengthened its AML/CFT framework since its last evaluation. The jurisdiction was commended for its solid risk assessments and national co-ordination mechanisms, particularly in the banking and fiduciary sectors. However, MONEYVAL recommended further refinements in risk-based AML/CFT policies, particularly in the supervision of trust and company service providers (TCSPs) and other high-risk DNFBPs.

ML investigations and prosecutions were found to be effective, with Guernsey actively pursuing ML cases. However, MONEYVAL noted that prosecutions remain limited given the jurisdiction's exposure to complex financial transactions, recommending a greater focus on high-risk predicate offences such as fraud, corruption, and tax evasion. The report also emphasised the importance of increasing confiscation efforts, ensuring that criminal proceeds are systematically traced and seized.

Guernsey's approach to TF risk was assessed as appropriate, with adequate legal frameworks and intelligence mechanisms in place. MONEYVAL highlighted the importance of maintaining a proactive stance on TF-related financial investigations and recommended enhanced risk-based supervision of the non-profit sector to prevent potential abuse.

Guernsey's AML/CFT supervisory regime was considered well-developed, particularly for financial institutions. However, the report noted that supervision of non-financial sectors, including TCSPs, legal professionals, and real estate agents, requires further strengthening. MONEYVAL advised enhancing enforcement measures to ensure compliance and increasing the use of sanctions where necessary.

The jurisdiction was commended for its transparency efforts, with well-established frameworks for beneficial ownership information. MONEYVAL recommended further enhancements in verifying the accuracy of ownership data and ensuring comprehensive access for competent authorities.

Guernsey was found to be highly co-operative in international AML/CFT efforts, effectively engaging in MLA and information sharing. The report suggested further development of case prioritisation mechanisms to enhance efficiency in international co-operation.

Guernsey shall report back to MONEYVAL under its regular follow-up reporting process in December 2026.

Fig 5: Mutual Evaluation Effectiveness Ratings – Guernsey (United Kingdom Crown Dependency)

IO1	IO2	IO3	IO4	IO5	IO6	IO7	IO8	IO9	IO10	IO11
SE	SE	ME	ME	SE	ME	LE	ME	SE	HE	HE



2.2. 5TH ROUND FOLLOW-UP REPORTS

By the end of 2024, several jurisdictions – Bulgaria, Croatia, Estonia, Georgia, Gibraltar, Hungary, Republic of Moldova, Monaco, Poland, San Marino, and Slovak Republic – underwent enhanced follow-up reporting, while the Holy See (including the Vatican City State) was under regular follow-up. The revision of follow-up procedures, adopted in December 2023, provided a basis for placing the Slovak Republic and Georgia under Step 1 of CEPs due to outstanding technical deficiencies. The decisions to terminate CEPs for Lithuania and Slovenia, and to maintain them for Czechia, were not linked to this revision.

While jurisdictions have achieved significant improvements in their technical compliance ratings through follow-up processes, there is more diversity in effectiveness ratings.

MONEYVAL continued its work in monitoring the remediation of technical gaps within national AML/CFT regimes as part of the follow-up processes. MONEYVAL monitors each jurisdiction's remedial efforts via follow-up procedures, ensuring that weaknesses identified during evaluations are addressed promptly and sustainably. While the expectation under Rule 21(8) of the Rules of Procedure is that jurisdictions address most technical compliance deficiencies within three years from the adoption of their MER, results across the 5th round have varied. A significant number of jurisdictions made steady progress through follow-up reporting and re-ratings, although not all met this benchmark within the expected timeframe. The overall trend reflects a strong commitment to technical compliance remediation.

By the end of 2024, several jurisdictions had achieved significant improvements in their compliance ratings, with many having met the expected threshold for technical compliance. MONEYVAL will continue to monitor progress under its enhanced follow-up process, with further reporting expected in 2025.

2.2.1. Hungary – 6th Enhanced Follow-up Report



Hungary's MER was adopted in September 2016, placing the country under enhanced follow-up. In line with the follow-up process, Hungary submitted its 1st enhanced follow-up report in December 2017, followed by the 2nd follow-up report in December 2018, the 3rd follow-up report in December 2019, the 4th follow-up report in April 2021, and the 5th follow-up report in May 2022.

The assessment of Hungary's request for technical compliance re-ratings and the preparation of the 6th follow-up report were undertaken by the United Kingdom, in co-operation with the MONEYVAL Secretariat. Hungary made progress to improve its technical compliance by addressing the deficiencies identified in the MER and the applicable follow-up reports. Hungary requested re-ratings for Recommendations 8 and 15, but only R. 15 was re-rated from partially compliant (PC) to largely compliant (LC). The authorities did not request a re-rating for R.32, which is rated as PC. To date, Hungary has achieved a rating of LC or compliant (C) for 38 Recommendations, with only two Recommendations (R.8 and R.32) remaining at PC.

In accordance with MONEYVAL's Rules of Procedure, Hungary has reached the required threshold and has addressed most, if not all, technical deficiencies. Consequently, taking into account that the onsite visit for the 6th round mutual evaluation is scheduled for October 2026, and in line with Rule 23 of the Rules of Procedure, Hungary is no longer subject to the 5th round follow-up process.

2.2.2. Republic of Moldova – 2nd Enhanced Follow-up Report



The MER of the Republic of Moldova was adopted in July 2019, placing the country under enhanced follow-up. In line with the follow-up process, the 1st enhanced follow-up report was adopted in May 2022. The Republic of Moldova did not request any re-ratings for consideration during the May 2023 Plenary, at which point the country should have submitted its second follow-up report.

The assessment of the Republic of Moldova's request for technical compliance re-ratings and the preparation of this report were undertaken by the Rapporteur teams of Ukraine and Andorra, in co-operation with the MONEYVAL Secretariat. The authorities requested re-ratings for Recommendations 6, 7, 8, 24, and 25, and also addressed new requirements arising from changes to the FATF Recommendations since the MER was adopted, specifically for R. 15.

The Republic of Moldova has made progress to address most of the technical compliance deficiencies identified in the MER and applicable subsequent follow-up reports with regard to Recommendations 6 and 7 and has made some limited progress on R. 15. As a result of this progress, three Recommendations have been re-rated. Recommendations 8, 24, and 25 were also analysed as part of the re-rating request, however, insufficient progress was made to justify an upgrade.

To date, 34 Recommendations are rated as C or LC, while six Recommendations (R.8, R.15, R.22, R.24, R.25,

and R.38) remain rated as PC. In line with Rule 21(8), the Republic of Moldova was expected to address most, if not all, of its technical compliance deficiencies by July 2023. Pursuant to Rule 25(1), the Compliance Enhancing Procedures may be launched at the end of the third year of follow-up if a jurisdiction has not met this threshold. As the threshold has not been reached, the Plenary decided to issue a CEPs warning to the Republic of Moldova. Accordingly, if the threshold is not met by June 2025, Step 1 of the CEPs will be automatically applied.

The Republic of Moldova will remain in enhanced follow-up and continue to report back to MONEYVAL on progress made in strengthening the implementation of AML/CFT measures. The next report is expected in 2025.

2.2.3. San Marino – 1st Enhanced Follow-up Report



The MER of San Marino was adopted in April 2021, placing the country under regular follow-up.

The assessment of San Marino's request for a technical compliance re-rating and the preparation of this report were undertaken by the Rapporteur team of Bulgaria, in co-operation with the MONEYVAL Secretariat. The request concerned R. 35, for which San Marino sought a re-rating. For the remaining Recommendations rated as PC, namely R.15, R.24, R.26, and R.28, the authorities did not request re-ratings.

San Marino has made progress in addressing the technical compliance deficiencies identified in the MER. As a result, R. 35 has been re-rated. To date, San Marino has achieved a rating of LC or C for 37 Recommendations, while four Recommendations (R. 15, R.24, R.26, and R.28) remain rated as PC.

Accordingly, San Marino will remain in regular follow-up and, in line with Rule 22 of the Rules of Procedure for the 5th Round of Mutual Evaluations, is expected to report back in 2028.

2.2.4. Holy See (including the Vatican City State) – 1st Follow-Up Report



The MER of the Holy See (including the Vatican City State) was adopted in April 2021, placing the jurisdiction under regular follow-up.

The assessment of the Holy See's (including the Vatican City State) request for technical compliance re-ratings and the preparation of this report were undertaken by the Rapporteur team of Albania, in co-operation with the MONEYVAL Secretariat. The request

concerned Recommendations 13, 16, and 24, for which the authorities' sought re-ratings. For the remaining Recommendations rated as PC, namely R.6, R.7, R.8, and R.27, the authorities did not request re-ratings.

The Holy See (including the Vatican City State) has made progress in addressing the technical compliance deficiencies identified in the MER. As a result, it has been re-rated on Recommendations 13, 16, and 24.

Accordingly, the Holy See (including the Vatican City State) will remain in regular follow-up and continue to report back to MONEYVAL on progress in strengthening the implementation of AML/CFT measures. Subject to the application of Rule 22 of the Rules of Procedure for the 5th Round of Mutual Evaluations, the Holy See (including the Vatican City State) is expected to report back in 2028.

2.2.5. Bulgaria – 1st Enhanced Follow-up Report



The MER of Bulgaria was adopted in May 2022, placing the country under enhanced follow-up.

The assessment of Bulgaria's request for technical compliance re-ratings and the preparation of this report were undertaken by the Rapporteur teams of Armenia, Azerbaijan, Croatia, and Cyprus, in co-operation with the MONEYVAL Secretariat. The request concerned Recommendations 2, 12, 13, 14, 15, 18, 22, 25, 26, 27, 32, and 33. For the remaining Recommendations rated as PC, namely R.4, R.5, R.6, R.7, R.8, R.10, R.24, R.28, R.34, R.35, and R.38, the authorities did not request re-ratings.

Bulgaria has made progress in addressing the technical compliance deficiencies identified in the MER. As a result, the country has been re-rated on Recommendations 2, 12, 14, 18, 22, 25, 26, 27, 32, and 33. Recommendations 13 and 15 were also analysed as part of the re-rating request; however, no re-ratings were granted.

Accordingly, Bulgaria will remain in enhanced follow-up and continue to report back to MONEYVAL on progress in strengthening the implementation of AML/CFT measures. Bulgaria is expected to report back in 2025.

2.2.6. British Overseas Territory of Gibraltar – 2nd Enhanced Follow-up Report



The MER of Gibraltar was adopted in December 2019, placing the jurisdiction under enhanced follow-up.

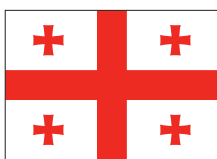
The assessment of Gibraltar's request for a technical compliance re-rating and the preparation of this report were undertaken by the

Rapporteur team of Bulgaria, in co-operation with the MONEYVAL Secretariat. The request concerned R. 36, for which the authorities sought a re-rating.

Gibraltar has made progress in addressing the technical compliance deficiencies identified in the MER. As a result, it has been re-rated on R. 36. Gibraltar has now implemented all 40 Recommendations at a level of LC or C.

In application of Rule 23(5) of the 5th round Rules of Procedure, no further reporting is required under MONEYVAL's 5th round of evaluations.

2.2.7. Georgia – 3rd Enhanced Follow-up Report



The MER of Georgia was adopted in September 2020, placing the country under enhanced follow-up. Georgia's 1st enhanced follow-up report was adopted in November

2022, followed by the 2nd follow-up report in December 2023.

The assessment of Georgia's request for technical compliance re-ratings and the preparation of this report were undertaken by the Rapporteur teams of Czechia, Estonia, and Malta, in co-operation with the MONEYVAL Secretariat. The request concerned Recommendations 1, 6, 7, 15, 22, 23, 28, and 35. The authorities did not request re-ratings for the remaining Recommendations rated as PC (R.24 and R.25) and non-compliant (NC) (R.8).

Georgia has made progress in addressing the technical compliance deficiencies identified in the MER and applicable subsequent follow-up reports. As a result, Recommendations 1 and 15 have been re-rated. The remaining Recommendations (R.6, R.7, R.22, R.23, R.28, and R.35) were also analysed, but no re-ratings were granted. R. 6, one of the "big six" Recommendations, remains rated PC.

In accordance with Rule 23 of the Rules of Procedure for the 5th Round of Mutual Evaluations, Georgia will be placed under Compliance Enhancing Procedures, and the Plenary is invited to confirm that Step 1 of CEPs should apply. As Georgia has not reached the threshold of addressing most, if not all, deficiencies, the Plenary may also decide, in line with Rule 25 of the Rules of Procedure, to apply CEPs to the following non-"big six" Recommendations that remain: (i) PC – R.7, R.22, R.23, R.24, R.25, R.28, and R.35; and (ii) NC – R.8.

In line with the Rules of Procedure, the Chair will send a letter to the Head of Delegation for Georgia, drawing attention to the non-compliance with the reference documents and requiring the country to provide a

report on the Recommendations placed under CEPs before the next MONEYVAL Plenary meeting.

Georgia will remain under the enhanced follow-up process and is expected to report back to the Plenary in 2025 on the progress made regarding Recommendations remaining rated as PC and NC.

2.2.8. Slovak Republic – 3rd Enhanced Follow-up Report



The MER of the Slovak Republic was adopted in September 2020, placing the country under enhanced follow-up. The 1st enhanced follow-up report was adopted in November 2022, followed by the 2nd follow-up report in December 2023.

The assessment of the Slovak Republic's request for technical compliance re-ratings and the preparation of this report were undertaken by the Rapporteur team of Georgia, in co-operation with the MONEYVAL Secretariat. The request concerned Recommendations 8, 15, and 19. For the remaining Recommendations rated as PC, namely R.10, R.12, R.13, R.18, R.23, R.28, R.29, R.32, and R.35, the authorities did not request re-ratings.

The Slovak Republic has made some progress in addressing the technical compliance deficiencies identified in the MER and applicable subsequent follow-up reports. However, following the analysis of Recommendations 8, 15, and 19, the progress was deemed insufficient to justify an upgrade, and all three Recommendations remain rated PC.

Several changes have been made since the adoption of the MER or subsequent follow-up reports. The Slovak Republic conducted targeted risk assessments of the non-profit organisations sector in relation to R. 8 and the VASPs sector in relation to R. 15. With regard to R. 19, amendments to the AML/CFT Act now require the FIU to regularly update and publish the list of high-risk jurisdictions identified by the FATF.

R. 10, one of the "big six" Recommendations, remains rated PC. Accordingly, in line with Rule 23 of the Rules of Procedure for the 5th Round of Mutual Evaluations, the Plenary agreed to place the Slovak Republic under Compliance Enhancing Procedures and apply Step 1.

As the Slovak Republic has not reached the threshold of addressing most, if not all, deficiencies, the Plenary may also decide, in line with Rule 25 of the Rules of Procedure, to apply Compliance Enhancing Procedures to the following non-"big six" Recommendations that remain rated PC: R.8, R.12, R.13, R.15, R.18, R.19, R.23, R.28, R.29, R.32, and R.35.

In line with the Rules of Procedure, the Chair will send a letter to the Head of Delegation for the Slovak Republic, drawing attention to the non-compliance with the reference documents and requiring the country to provide a report on the Recommendations placed under Compliance Enhancing Procedures before the next MONEYVAL Plenary meeting.

The Slovak Republic will remain under the enhanced follow-up process and is expected to report back to the Plenary in 2025 on the progress made in relation to Recommendations remaining rated as PC.

2.2.9. Croatia – 2nd Enhanced Follow-up Report



The MER of Croatia was adopted in December 2021, placing the country under enhanced follow-up. Croatia's 1st enhanced follow-up report was adopted in December 2023.

The assessment of Croatia's request for technical compliance re-ratings and the preparation of this report were undertaken by the Rapporteur teams of the British Overseas Territory of Gibraltar, Lithuania, and Hungary, in co-operation with the MONEYVAL Secretariat. The request concerned Recommendations 1, 2, 6, 7, 15, 18, 33, 35, and 36. For the remaining Recommendations rated as PC, namely R.8, R.24, and R.38, the authorities did not request re-ratings.

Croatia has made progress in addressing the technical compliance deficiencies identified in the MER and applicable subsequent follow-up reports. As a result, the country has been re-rated on Recommendations 1, 2, 6, 7, 15, 33, 35, and 36. R. 18 was also analysed as part of the re-rating request; however, no re-rating was granted.

Accordingly, Croatia will remain under the enhanced follow-up process and continue to report back to MONEYVAL on progress in strengthening the implementation of AML/CFT measures. Croatia is expected to report back in 2025.

2.2.10. Poland – 2nd Enhanced Follow-up Report



The MER of Poland was adopted in December 2021, placing the country under enhanced follow-up. Poland's 1st enhanced follow-up report was adopted in December 2023.

The assessment of Poland's request for technical compliance re-ratings and the preparation of this report were undertaken by the Rapporteur teams of the Isle of Man and Israel, in co-operation with the MONEYVAL

Secretariat. The request concerned Recommendations 1, 15, 26, and 33. For the remaining Recommendations rated as PC, namely R.5, R.7, R.8, R.13, R.17, R.18, R.19, R.20, R.22, R.28, R.32, and R.35, the authorities did not request re-ratings.

Poland has made progress in addressing the technical compliance deficiencies identified in the MER and applicable subsequent follow-up reports. As a result, the country has been re-rated on Recommendations 1 and 33. Recommendations 15 and 26 were also analysed as part of the re-rating request; however, no re-ratings were granted.

Accordingly, Poland will remain under the enhanced follow-up process and continue to report back to MONEYVAL on progress in strengthening the implementation of AML/CFT measures. Poland is expected to report back in 2025.

2.2.11. Estonia – 1st Enhanced Follow-up Report



The MER of Estonia was adopted in December 2022, placing the country under enhanced follow-up.

The assessment of Estonia's request for technical compliance re-ratings and the preparation of this report were undertaken by the Rapporteur teams of Jersey and Israel, in co-operation with the MONEYVAL Secretariat. The request concerned Recommendations 6, 7, and 15. For the remaining Recommendations rated as PC, namely R.1, R.8, R.13, R.19, R.20, R.21, R.23, R.24, R.25, R.28, R.33, and R.35, the authorities did not request re-ratings.

Estonia has made progress in addressing the technical compliance deficiencies identified in the MER. As a result, R. 6 has been re-rated from PC to LC.

Accordingly, Estonia will remain under the enhanced follow-up process and continue to report back to MONEYVAL on progress in strengthening the implementation of AML/CFT measures. Estonia is expected to report back in 2025.

2.2.12. Monaco – 1st Enhanced Follow-up Report



The MER of the Monaco was adopted in December 2022, placing the country under enhanced follow-up.

The assessment of Monaco's request for technical compliance re-ratings and the preparation of this report were undertaken by the Rapporteur teams of Andorra, Armenia, Republic of Moldova, Romania, and San Marino, in co-operation with the MONEYVAL Secretariat. The request

concerned Recommendations 4, 6, 7, 8, 12, 23, 24, 25, 26, 27, 28, 31, 34, 35, and 37. For the remaining Recommendations rated as PC, namely R.15, the authorities did not request a re-rating.

Monaco has made progress in addressing the technical compliance deficiencies identified in the MER. As a result, the country has been re-rated on Recommendations 4, 6, 7, 8, 12, 23, 24, 25, 26, 27, 28, 31, 34, 35, and 37.

Accordingly, Monaco will remain under the enhanced follow-up process and continue to report back to MONEYVAL on progress in strengthening the implementation of AML/CFT measures. Monaco is expected to report back in 2025.

2.3. COMPLIANCE ENHANCING PROCEDURES (CEPS)

MONEYVAL's Compliance Enhancing Procedures (CEPs) ensure that countries take steps to meet the international standards and follow MONEYVAL recommendations within an appropriate timeframe. For both the 4th and the 5th round of mutual evaluations, the process is as follows:

Steps in CEPs process

- ▶ **Step 1:** MONEYVAL inviting the Secretary General of the Council of Europe to send a letter to the relevant Minister(s) of the State or territory concerned, drawing his/her/their attention to non-compliance with the reference documents and the necessary corrective measures to be taken.
- ▶ **Step 2:** Arranging a high-level mission to the non-complying State or territory to meet relevant Ministers and senior officials to reinforce this message.
- ▶ **Step 3:** In the context of the application of the 2012 FATF R. 19 by MONEYVAL Member States and territories, issuing a formal public statement to the effect that a State or territory insufficiently complies with the reference documents and inviting the members of the global AML/CFT network to take into account the risks posed by the non-complying State or territory.
- ▶ **Step 4:** Referring the matter for possible consideration under the FATF's International Cooperation Review Group (ICRG) process, if this meets the nomination criteria set out under the ICRG procedures.

In line with MONEYVAL's internal procedures, jurisdictions may be automatically placed under CEPs when they fail to address technical compliance deficiencies in key Recommendations, such as R.6 on TFS or R.10 on CDD. These areas are considered critical due to their direct impact on the effectiveness of AML/CFT systems and alignment with international standards.

At the end of 2023, Czechia and Lithuania were placed under CEPs. As a result of action taken to address shortcomings under R.6, the application of Step 1 of MONEYVAL's CEPs to Lithuania was terminated at the 68th Plenary meeting of MONEYVAL in December 2024. Czechia remains under step 1 of CEPs and was expected to report again in 2025 on additional action that has been taken to address shortcomings under R.6.

The 68th Plenary meeting of MONEYVAL further decided to place the Slovak Republic and Georgia under Step 1 of CEPs. The Slovak Republic had made insufficient progress in addressing several technical compliance deficiencies under R.10, as identified in its latest follow-up report in December 2024. Georgia was placed under Step 1 of CEPs in light of outstanding deficiencies in technical compliance under R.6. Both countries are expected to report back in 2025 on progress achieved.

2.4. VOLUNTARY TAX COMPLIANCE PROGRAMME

Whenever necessary, MONEYVAL conducts assessments of compliance of voluntary tax compliance programmes established in its Member States and territories with the AML/CFT framework, in application of its dedicated procedures. In December 2024, MONEYVAL examined the programme introduced by Georgia in June 2024 and concluded that it aligned with the FATF's principles.

Fig. 7 : Ratings following the mutual evaluation and follow-up reports adopted in 2024

📄 mutual evaluation report ☑️ follow-up report		Bosnia and Herzegovina	Guernsey	Jersey	Bulgaria	Croatia	Estonia	Georgia	Gibraltar	Holy See	Hungary	Republic of Moldova	Monaco	Poland	San Marino	Slovak Republic	
		📄	📄	📄	☑️	☑️	☑️	☑️	☑️	☑️	☑️	☑️	☑️	☑️	☑️	☑️	☑️
Effectiveness	● High ● Substantial ● Moderate ● Low																
	Risk, policy and coordination (IO1)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	International co-operation (IO2)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Supervision (IO3)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Preventive measures (IO4)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Legal persons & arrangements (IO5)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Financial intelligence (IO6)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	ML investigation & prosecution (IO7)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Confiscation (IO8)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	TF investigation & prosecution (IO9)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	TF preventive measures & financial sanctions (IO10)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
PF financial sanctions (IO11)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	
Technical Compliance	● Compliant ● Largely compliant ● Partially compliant ● Non compliant																
	Assessing risk & applying risk-based approach (R.1)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	National cooperation & coordination (R.2)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Money laundering offence (R.3)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Confiscation & provisional measures (R.4)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Terrorist financing offence (R.5)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Targeted financial sanctions-terrorism & TF (R.6)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Targeted financial sanctions-proliferation (R.7)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Non-profit organisations (R.8)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Financial institutions secrecy laws (R.9)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Customer due diligence (R.10)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Record keeping (R.11)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Politically exposed persons (R.12)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
Correspondent banking (R.13)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	

Conformité technique	Money or value transfer services (R.14)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	New technologies (R.15)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Wire transfers (R.16)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Reliance on third parties (R.17)	●	●	●	●	●	●	●	●	N/A	●	●	●	●	●	●	●
	Internal controls & foreign branches /subsidiaries (R.18)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Higher risk countries (R.19)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Reporting of suspicious transactions (R.20)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Tippling-of and confidentiality (R.21)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	DNFBPs- customer due diligence (R.22)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	DNFBPs- other measures (R.23)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Transparency & BO of legal persons (R.24)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Transparency & BO of legal arrangements (R.25)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Regulation & supervision of financial institutions (R.26)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Powers of supervision (R. 27)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Regulation & supervision of DNFBPs (R.28)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Financial intelligence units (R.29)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Responsibilities law enforcement / investigative authorities (R.30)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Powers law enforcement / investigative authorities (R.31)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Cash couriers (R.32)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Statistics (R.33)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Guidance and feedback (R.34)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Sanctions (R.35)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	International instruments (R. 36)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Mutual legal assistance (R.37)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Mutual legal assistance: freezing and confiscation (R.38)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Extradition (R.39)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
	Other forms of international co operation (R.40)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●



3. PREPARATIONS FOR THE 6TH ROUND OF MUTUAL EVALUATIONS

As noted previously, in 2024 MONEYVAL launched its 6th round of mutual evaluations, with Latvia being the first in the Global Network to undergo an assessment. Mutual evaluation processes were also initiated for Serbia, Slovenia, and Armenia. This new round places an even greater focus on effectiveness, as well as on the assessment of major risks and contextual factors. Recommendations in the MERs will now be more result-oriented, highlighting concrete actions and defined timelines.

In preparation for the 6th round of mutual evaluations, MONEYVAL enhanced its training programme to ensure that assessors possess the necessary skills and expertise for the new cycle. While a paper on the sequencing was presented to the Plenary in December 2024 for information, no formal approval has been granted. The 6th round is expected to last approximately 7.5 years, starting from the adoption of the first MER in June 2025.

3.1. TRAINING FOR THE 6TH ROUND

Training is a high priority area for MONEYVAL in order to appropriately conduct the 6th round of mutual evaluations and support follow-up processes. Successful completion of the training is essential for experts to qualify as MONEYVAL and FATF assessors.

► **First new round joint FATF-MONEYVAL assessors training in Helsinki:** From 15-19 January 2024, MONEYVAL and the FATF jointly organised a week-long assessors training for the upcoming

evaluation cycle. 45 experts from 6 MONEYVAL³ and 20 FATF Global Network members, and from MONEYVAL secretariat, attended. The training addressed both technical compliance and effectiveness, equipping participants with theoretical and practical tools for identifying AML/CFT/CPF gaps and providing constructive recommendations to assessed countries. This training was open to new and experienced assessors.

► **MONEYVAL assessors training in Riga:** From 8 to 12 April 2024, MONEYVAL, in co-operation with Latvian authorities, organised an assessors training session for 39 experts from 14 MONEYVAL⁴ jurisdictions and from the MONEYVAL Secretariat. This training, primarily aimed at new assessors, focused on both technical compliance and effectiveness, mirroring the Helsinki training in terms of methodology and objectives. MONEYVAL wishes to thank the Latvian authorities for their support and co-operation in hosting the event.

► **MONEYVAL experts' training on AML/CFT/CPF Standards:** From 23 to 27 September 2024, 42 participants from 23 jurisdictions across the FATF and MONEYVAL networks took part in the Standards Training Course delivered by the FATF Training Institute in Luxembourg. This training aimed to support the application of the FATF standards. The MONEYVAL Secretariat contributed as a trainer to this event.

3. Armenia, Andorra, Isle of Man, Estonia, Monaco, and Poland.

4. Andorra, Azerbaijan, Croatia, Estonia, Isle of Man, Jersey, Lithuania, Malta, North Macedonia, Poland, Romania, Serbia, Slovak Republic, and Slovenia.



4. HIGH-LEVEL AND VISIBILITY ENGAGEMENTS

In 2024, the MONEYVAL President and Secretariat carried out several high-level and visibility activities and engagements with external counterparts, including the following actions:

► **19 to 23 February – FATF Plenary and Working Groups Meetings, Paris:**

A MONEYVAL delegation, led by its Chair, Nicola Muccioli, actively participated in all working groups and discussions. Key areas of engagement included the development of a new risk-based guidance for the implementation of R.25 on beneficial ownership, the identification of jurisdictions with materially important VA activity, the revision of the methodology in the areas of confiscation of proceeds of crime, and procedures for the protection of NPOs from potential abuse for TF. Mr Muccioli also held a meeting with FATF President T. Raja Kumar and FATF Vice-President Jeremy Weil to exchange views on shared priorities, strategic matters and ongoing co-operation within the global AML/CFT framework.

► **26 to 27 February – Joint training of FATF-style regional bodies, Paris:**

MONEYVAL staff attended this training, which focused on key topics such as the procedures for the new round of mutual evaluations, recent changes to the FATF Recommendations, and updates to the Methodology for assessing compliance with FATF requirements. Such joint training sessions are essential for preparing the new round of mutual evaluations and for ensuring a high standard of quality and consistency across the FATF Global Network.

► **22 to 28 June – FATF Plenary & Working Groups Meetings, Singapore:**

A MONEYVAL delegation, led by its Chair, officially welcomed the new FATF President, Ms Elisa de Anda Madrazo, and contributed to several FATF workstreams, including enhancing co-ordination and co-operation between the FATF and FATF-Style Regional Bodies (FSRBs), changes to the FATF methodology, the EU supranational

measures project, and FATF MERs. The delegation also closely followed the ICRG processes concerning MONEYVAL members under ICRG review. The E-book titled “Breaking Barriers: Inspiring the Next Generation of Women Leaders”, launched within the framework of the Women in FATF and FSRB Initiative, features MONEYVAL’s former Chair among its profiled women leaders.

► **23 June – FATF-FSRB Annual High-Level Meeting, Singapore:**

As a part of the FATF plenary meeting hosted by Singapore, on 23 June 2024 the FATF President met with the Chairs of the FSRBs at the FATF-FSRB Annual High-Level Meeting. MONEYVAL Chair took an active part in this meeting, which discussed progress in the implementation of the 2022 Strategic vision for the Global Network including the main achievements in strengthening the partnership between the FATF and FSRBs. As a result, three Global Network priorities for the coming year were agreed. These include: (i) increasing FSRBs’ voice and participation in FATF work; (ii) preparation for the new round of mutual evaluations; and (iii) strengthening AML/CFT expertise at regional level.

► **14 October – Aspects of Constitutionalism in European Small-Sized States, Strasbourg:**

The conference was organised under the auspices of the Secretary General of the Council of Europe, Alain Berset. During his address, MONEYVAL chair Mr Muccioli drew upon MONEYVAL’s experience in co-operating with small states, highlighting best practices, challenges, and key lessons learnt. He commended the contribution of these members to the global fight against ML and TF, underlining their dedication to the Organisation’s core objectives.

► **21 to 25 October – FATF Plenary and Working Groups Meetings, Paris:**

Mr. Muccioli led the MONEYVAL delegation and participated in discussions on preparing for the new evaluation round and co-ordination between the FATF and FSRBs. The Plenary discussed de-risking, financial exclusion, the ongoing EU

supranational measures project, potential changes to the FATF Standards, and the latest FATF MERs. The delegation followed the ICRG processes concerning MONEYVAL members. MONEYVAL called for effective implementation of international standards to counter ML and TF in Europe.

► **6 November – Council of Europe’s Committee of Ministers meeting, Strasbourg:**

MONEYVAL Chair Nicola Muccioli and FATF President de Anda Madrazo held an exchange of views with the Committee of Ministers. Mr Muccioli highlighted MONEYVAL’s work and accomplishments in 2023 and MONEYVAL’s close co-operation with the FATF in revising AML/CFT/CPF global standards. The FATF underlined the strong relationship between the FATF, the Council of Europe, and MONEYVAL, and shared the FATF’s priorities in steering global action against illicit finance.

► **8 November – 2023 Annual Report publication, Strasbourg:**

In the context of the publication of its 2023 report, MONEYVAL called on its 33 member states and territories to strengthen the effective implementation of AML/CFT/CPF international standards. Mr Muccioli stressed the need for stronger enforcement in asset tracing and recovery. This echoes findings from the report, which acknowledges progress in areas such as risk understanding and international co-operation, but notes serious gaps in supervision, private sector compliance, transparency of legal persons, and asset recovery.

► **11 to 15 December – Egmont Group Europe II Working Group, Strasbourg:**

In the margins of the MONEYVAL Plenary in December 2024, and with the assistance of the MONEYVAL Secretariat, the Egmont Group held a meeting of the Europe II Working Group. A representative of the Secretariat delivered a presentation on the latest typologies report on money laundering risks related to VAs. The presentation was followed by a Q&A session.



5. PARTNERING AND ENGAGING FOR IMPACT

MONEYVAL is a key partner within the FATF's Global Network of AML/CFT assessment bodies. Developing horizontal partnerships across this network is critical to MONEYVAL's coherent functioning and enhances overall global effectiveness in combating ML, TF, and PF.

5.1. ENGAGEMENT WITH THE FINANCIAL ACTION TASK FORCE

The FATF is MONEYVAL's principal international partner and collaborator. Established in 1989, the FATF develops and promotes policies to protect the global financial system against ML, TF, and PF. It works closely together with its nine FSRBs, among which MONEYVAL. FSRBs contribute to the development of FATF's global standards and drive effective implementation in their region and play a critical role in identifying and monitoring risks in the region.

As an Associate Member, MONEYVAL is required and has regularly contributed to the FATF's global policy-making through its Chair, Vice-Chairs, and Secretariat, who actively participate in the FATF's Plenary and

Working Group meetings. MONEYVAL's members and Secretariat devote substantial resources to follow the work of all FATF working groups, including the ICRG, the Policy and Development Group (PDG), and the Evaluations and Compliance Group (ECG). These engagements ensure MONEYVAL's voice is heard when the FATF interprets or revises standards and influences decisions that have direct implications for its membership and future MONEYVAL evaluations.

In 2024, MONEYVAL's delegation attended at three FATF Plenaries (February, June, and October), alongside multiple other project and working group meetings. During these meetings, the delegation followed the progress of the FATF ECG project on "Ensuring a consistent and coherent approach to EU supranational measures," to which the MONEYVAL Secretariat has contributed since July 2024. This ongoing project is being developed in two phases: the first focuses on existing EU regulations, while the second will address the forthcoming EU AML/CFT legislative package taking effect from 2027.

Throughout 2024, MONEYVAL maintained its regular engagement with the FATF Risk, Trends and Methods

Group (RTMG), contributing to discussions, sharing regional insights, providing updates on relevant developments, and following global trends in typologies and emerging threats. MONEYVAL was part of the PDG project team that drafted the Guidance on Beneficial Ownership and Transparency of Legal Arrangements, published in March 2024. The Guidance aims to assist countries and the private sector in better understanding how transparency requirements apply to legal arrangements. MONEYVAL also contributed to discussions on proposed revisions to the FATF Methodology (notably R. 4, R. 30, R.31, R.38, and R.40) and changes to Immediate Outcomes 2 and 8 that reinforce asset recovery mechanisms. Such involvement helps MONEYVAL, and its members stay informed of ongoing international developments in order to incorporate them effectively into mutual evaluation and follow-up processes.

MONEYVAL also continued its close dialogue with the ICRG, which reviews jurisdictions under increased monitoring. Throughout 2024, several MONEYVAL member states were subject to ICRG procedures, reflecting a need to address remaining gaps in their AML/CFT frameworks. MONEYVAL remains active in supporting these jurisdictions to ensure that enhanced monitoring leads to practical reforms. In total, during the 5th mutual evaluation round (2015 – 2024), ten MONEYVAL jurisdictions were subject to ICRG's review as a result of their ratings in the previous round. Of these, three countries – Isle of Man, Hungary, and Latvia – undertook the measures required and completed the one-year observation period without being listed. MONEYVAL actively participated in the meetings of the Eurasia-Middle East & North Africa (E-MENA) Joint Group, which is co-chaired by FATF and MONEYVAL (Richard Walker, Guernsey), following closely its members subject to the ICRG process. In 2024 Gibraltar was removed from the *grey list*¹, while Bulgaria, Croatia and Monaco remained on the *grey list*. As a result of its evaluation, completed in 2024, Bosnia and Herzegovina was subject to ICRG's one year observation period in February 2025.

5.2. ENGAGEMENT WITH FATF-STYLE REGIONAL BODIES

MONEYVAL holds observer status with other FSRBs and participated in joint initiatives aimed at reinforcing co-operation across the Global Network. In 2024, MONEYVAL representatives met with peers from FSRBs such as GAFILAT, ESAAMLG, MENAFATF, GIABA, and GABAC, exchanging best practices on mutual evaluations, digital tools for monitoring, and methods to maintain consistency across assessments.

MONEYVAL contributed its perspective as it finalised its 5th evaluation round and prepared to launch its 6th, encouraging greater alignment of procedural

frameworks. Other FSRBs likewise shared insights on capacity-building strategies, technological solutions for streamlining follow-up procedures, and thematic research on topics such as beneficial ownership transparency.

5.3. PARLIAMENTARY ASSEMBLY OF THE COUNCIL OF EUROPE (PACE)

PACE is an important partner for MONEYVAL, due its active interest in promoting stronger responses to ML, corruption, and other financial crimes. Exchanges with PACE facilitate high-level political dialogue, highlight the need for robust AML/CFT measures, and increase the visibility of MONEYVAL's recommendations among parliamentarians. These interactions ultimately contribute to shaping effective national responses and garnering broader support for anti-financial crime policies also at regional and international levels.

5.4. ENGAGEMENT WITHIN THE COUNCIL OF EUROPE

Engagement with the bodies of the Council of Europe remains a key priority in MONEYVAL's work. Close collaboration with various committees and institutions within the Organisation ensures that MONEYVAL's expertise is fully leveraged in promoting effective AML/CFT policies, while also contributing to the shared objectives of protection of human rights and respect for the rule of law.

The Conference of the Parties to CETS No. 198 (C198-COP)

The co-operation between MONEYVAL and the Conference of the Parties to the CETS No. 198 continued to represent a strategic alignment of efforts to combat financial crimes. Through information exchange, and use of findings from assessment processes, MONEYVAL and the C198-COP helped in ensuring consistency between their reports, thus reinforcing the capacity of member states to investigate and prosecute ML and confiscate proceeds of crime. The C198-COP work in the area of confiscation of proceeds of crime will be an important source of information for forthcoming MONEYVAL assessments on the revised FATF Recommendations 4 and 38.

The C198-COP and MONEYVAL share the same secretariat, which ensures effective co-ordination and consistency between the two bodies.

The Council of Europe's Committee of Experts on Criminal Asset Recovery (PC-RAC)

The Council of Europe's Committee of Experts on Criminal Asset Recovery (PC-RAC) was established under the authority of the Committee of Ministers and

the European Committee on Crime Problems (CDPC) to prepare an additional protocol supplementing the CETS 198, as well as to draft the corresponding explanatory report. The Committee began its work in 2024 and held its first three meetings in 2024, during which it discussed key elements to be included in the future legal instrument. MONEYVAL is invited to take in this process and accordingly, it appointed Ms Elisabeth Rattigan, from Isle of Man, to represent MONEYVAL in the PC-RAC. Ms Rattigan provides regular updates to MONEYVAL on PC-RAC developments.

In 2024 PC-RAC produced a zero draft of the additional protocol, outlining proposed tools and mechanisms for identifying, seizing, and confiscating the proceeds of crime, along with measures to enhance cross-border co-operation among states. The PC-RAC Secretariat is located within the MONEYVAL Division which ensures coherence and close collaboration also with the C198-COP, the CDPC, the Council of Europe's Committee of Experts on the Operation of European Conventions on Co-operation in Criminal Matters (PC-OC), other Council of Europe bodies, and relevant international organisations.

Economic Crime and Cooperation Division (ECCD)

The ECCD is essential in supporting technical assistance, capacity-building, and legislative reform in the AML/CFT systems of member states. The ECCD's work helps ensure that MONEYVAL's MER recommendations are translated into practical improvements on the ground and that member states continue to align their legislative and institutional AML/CFT frameworks with international standards.

Council of Europe International Co-operation Group on Drugs and Addictions (Pompidou Group)

MONEYVAL contributed to the Pompidou Group Annual Conference on Drug Control Networks (Strasbourg 19-21 November 2024) with a presentation on Money Laundering and asset recovery, in the context of the Focus Group discussions related to drugs online. The presentation was followed by a lively Q&A session.

The Convention on the Manipulation of Sports Competitions (the Macolin Convention)

MONEYVAL contributed to key Council of Europe dialogues relating to financial crime and sports integrity. On 18–19 June, MONEYVAL delivered a presentation

entitled "MONEYVAL in Brief" at the annual meeting of the MARS Network, which brings together magistrates and prosecutors focused on sports-related offences. On 14 November MONEYVAL shared insights at the 7th meeting of the Advisory Group to the Follow-up Committee on the Manipulation of Sports Competitions, highlighting findings from assessments results and achievements of C198-COP, particularly relating to AML and the integrity of sporting institutions.

Council of Europe's Steering Committee on Democracy (CDDEM)

In 2024, MONEYVAL continued to strengthen its co-operation with the Council of Europe's Steering Committee on Democracy (CDDEM), recognising the fundamental link between robust AML frameworks and the protection of democratic institutions. The collaboration focused on inclusion of integrity of competent authorities in the AML/CFT area in a larger scope of principles which underpin the Reykjavik principles for democracy. Furthermore, MONEYVAL inputs on matters that concern civil society and in particular those which include proper implementation of the FATF R. 8 (NPOs) were taken on board by CDDEM.

Sectoral bodies

MONEYVAL continues to engage with a range of institutions and committees within the Council of Europe, ensuring that its AML/CFT expertise is harmonised with broader organisational priorities:

MONEYVAL maintains working-level engagement with sectoral bodies within the Council of Europe, including PC-OC and the Council of Europe's Group of States against Corruption (GRECO), where its AML/CFT expertise contributes to shared monitoring and policy objectives. These links ensure that MONEYVAL's work aligns with broader institutional priorities.

5.5. EUROJUST MEETING ON MONEY LAUNDERING AND ASSET RECOVERY

MONEYVAL participated in the 2nd Eurojust Meeting on Money Laundering and Asset Recovery, held in The Hague and organised by Eurojust. The meeting included two thematic discussion sessions. The first focused on experiences with money laundering as a service, the use of Hawala, evidentiary thresholds to establish predicate offences, and the links between ML and organised crime. The second session addressed national challenges in asset recovery, including victim restitution, asset sharing, non-conviction-based confiscation, and measures related to unexplained wealth.



6. MONEVAL PLENARIES AND INTERSESSIONAL MEETING

During 2024, MONEVAL held its 67th and 68th Plenary meetings. Both were chaired by Mr Nicola Muccioli (San Marino) and attended by around 200 AML/CFT experts from approximately 50 jurisdictions and international organisations. These gatherings marked the successful completion of MONEVAL's 5th round of evaluations and provided opportunities for in-depth discussions on key AML/CFT developments.

Outcomes of the 67th Plenary Meeting (21 to 24 May 2024)

MONEVAL adopted the United Kingdom Crown Dependency of Jersey's MER, in addition to the follow-up reports of Gibraltar, Republic of Moldova, and Hungary. The plenary also took note of the adoption by written procedures of the follow up reports on Bulgaria, the Holy See (including Vatican City State), and San Marino. In preparation for the 6th evaluation round, the reporting under the 5th round was terminated for Albania, Czechia, Hungary, the Isle of Man, Andorra, and Lithuania.

Outcomes of the 6th Intersessional Meeting (2 July 2024)

MONEVAL revised its internal procedures for the 6th round and discussed the impact of the new round's methodology on MONEVAL's resources and its additional resource needs in order to ensure that it can adequately implement the 6th round of mutual evaluations in line with the parameters set by the FATF.

Outcomes of the 68th Plenary Meeting (2 to 6 December 2024)

MONEVAL adopted the MERs on Bosnia and Herzegovina and the United Kingdom Crown Dependency of Guernsey. It also approved follow-up reports for Estonia, Croatia, Georgia, Monaco, Poland, and the Slovak Republic. Lithuania successfully exited the CEPS, while Georgia and the Slovak Republic were placed under Step 1 of CEPs in addition to Czechia remaining under Step 1. The Plenary endorsed the analysis of the VTC programme introduced by Georgia and adopted an EU Supranational Measures horizontal study.

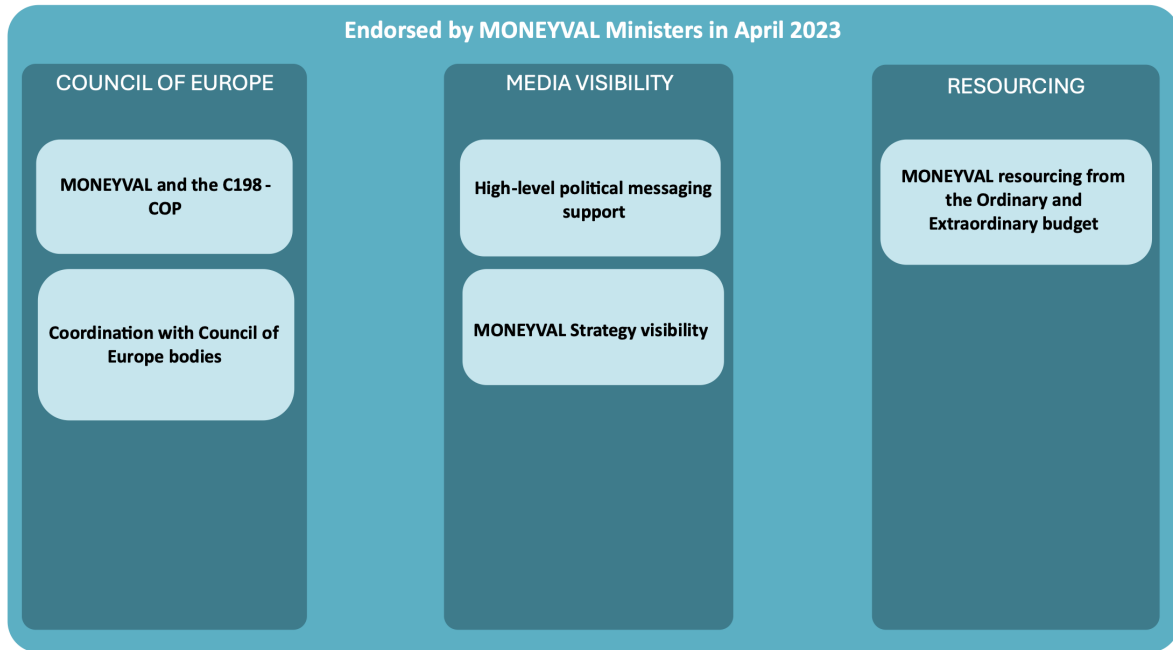
7. MONEYVAL'S 2023-2027 STRATEGY: PROGRESS UPDATE

On 25 April 2023, Ministers and high-level officials from MONEYVAL's member states declared their commitment to international and regional efforts to combat ML/FT/PF and adopted MONEYVAL's 2023-2027 Strategy. The Strategy presents current and forward-looking components of MONEYVAL's activities. It contains six Strategic Pillars that are further divided into basic objectives – the core statutory

objectives of MONEYVAL related to its mutual evaluation programme – and development objectives, which define perspectives for the development of MONEYVAL in various areas of its work.

In 2024, MONEYVAL continued to deliver on its six Strategic Pillars, to varying degrees. Below, we track progress under the Strategy on a scale from “underway”, “substantial progress”, and “completed”.





Pillar 1: CONTINUING AND ENHANCING MONEYVAL'S MONITORING PROGRAMME

► **Status: Substantial progress**

- 1.1: This basic objective was fully achieved as MONEYVAL successfully concluded the 5th round of mutual evaluations in 2024 by adopting the MERs on Jersey, Guernsey, and Bosnia and Herzegovina.
- 1.2: MONEYVAL adopted new Mutual Evaluation Questionnaires for technical compliance and effectiveness and related guidance. MONEYVAL amended its Rules of Procedures and related guidance to streamline follow-up reporting and clarify the application of CEPs. Follow-up reporting under the 5th round was terminated for Albania, Czechia, Hungary, the Isle of Man, Andorra, and Lithuania.
- 1.3: MONEYVAL initiated the 6th round of evaluations for Latvia, Armenia, Slovenia, and Serbia, and the on-site evaluation visit of Latvia took place in November 2024. It also began the preparatory work for the organisation of a joint FATF-MONEYVAL Plenary in 2025.
- 1.4: Three assessor training events were successfully organised in 2024 to ensure a sufficient pool of qualified assessors for the first years of the new evaluation round. These events were made through the valuable support and contributions of Finland, Latvia and Luxembourg. Draft guidance on training for the 6th round was adopted at the December 2024 Plenary. However, concerns remain regarding

the uneven level of participation in mutual evaluations, underscoring the need for continued efforts to promote more balanced engagement across all member states and jurisdictions.

Pillar 2: DEVELOPING THE ROLE OF MONEYVAL AS A REFERENCE POINT ON AML/CFT IMPLEMENTATION IN ITS REGION

► **Status: underway**

- 2.1: The EU Supranational Measures horizontal study in MONEYVAL 5th Round MERs includes elements on IO1, as a starting basis for developing a regional understanding of materiality and risks for MONEYVAL EU members. The study analyses how EU supranational legislation, mechanisms and other initiatives have been considered and weighted in the 5th round of mutual evaluations. As more than a third of MONEYVAL jurisdictions are EU member states, and others are committed to aligning with the EU AML/CFT acquis, the study contributes to a more consistent understanding of how supranational measures are to be interpreted and assessed in the evaluation process.
- 2.2: MONEYVAL has played a leading role in promoting a consistent understanding and assessment of EU supranational measures. MONEYVAL's EU Supranational Measures horizontal study analysed how these measures were considered and weighted in the MONEYVAL 5th round mutual evaluations. With over a third of its members being EU

members – and others having committed to harmonise their legislation with the EU’s AML/CFT acquis – the study laid a good foundation for the ongoing FATF project on ensuring a coherent approach to EU supranational measures, in which MONEYVAL plays a key role.

- 2.3: Progress continues on the “Proceeds and Conflicts” typology project, which seeks to develop a research-based understanding of major ML/TF trends and underlying rule of law and economic factors. Led by Ukraine, the project focuses on typologies that arise from military conflicts, including involving the misuse of crowdfunding, VAs, online payment systems, and the trans-shipment of dual-use goods to generate funds or assets to sustain conflicts.
- 2.4: There are no deliverables yet on developing benchmarks for measuring MONEYVAL’s AML/CFT impact.

Pillar 3: STRENGTHENING MONEYVAL’S ENGAGEMENT WITHIN THE FATF GLOBAL NETWORK AND WITH EXTERNAL COUNTERPARTS

► Status: underway

- 3.1: MONEYVAL made measurable progress through three joint assessor trainings (section 3.1), being the first in the Global Network to implement the new FATF methodology (section 3), and the participation of MONEYVAL’s chair in FATF Plenaries (section 4). The presence of the FATF President at the 2024 Council of Europe’s Committee of Ministers meeting symbolised the deepening relationship with FATF, as preparations proceeded for the joint FATF-MONEYVAL Plenary in June 2025. MONEYVAL also maintained robust co-ordination with the FATF Global Network and contributed to the Global Network’s priorities, particularly with respect to increasing the recovery of criminal proceeds and in preparing an Additional Protocol to the Warsaw Convention.
- 3.2: MONEYVAL has been active in developing horizontal ties with FSRBs in various streams, including the revision of FATF standards and training initiatives. In particular, MONEYVAL contributed to the ICRG’s Europe/Eurasia Joint Group meeting (Türkiye, May 2024) which reviewed AML/CFT progress made by three MONEYVAL members currently subject to the ICRG’s processes. The MONEYVAL Secretariat also participated in a *virtual FSRB exchange* organised by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH on 2 February 2024.

- 3.3: With respect to developing a framework of engagement for observers, MONEYVAL’s dedicated policy on observers was adopted in December 2023 and published in May 2024.

Pillar 4: DEVELOPING SYNERGIES WITHIN THE COUNCIL OF EUROPE

► Status: Substantial progress

- 4.1: In 2024, MONEYVAL followed the work of the C198-COP and the PC-RAC (see section 5.3), which continued their monitoring and thematic activities throughout the reporting period. The C198-COP held a thematic session on best practices for implementing Article 3(4) of the Convention, addressing the reversal of the burden of proof in confiscation proceedings. The PC-RAC, which began its work in 2024, held three meetings to discuss key elements for a future legal instrument and produced a zero draft of the additional protocol, outlining tools and mechanisms for identifying, seizing and confiscating the proceeds of crime, as well as measures to enhance cross-border co-operation.
- 4.2: MONEYVAL deepened its engagement with other Council of Europe bodies, including the Group of Experts on Action against Trafficking in Human Beings (GRETA), GRECO, and the Venice Commission. MONEYVAL contributed to Council of Europe events, including initiatives to combat manipulation of sports competitions and related money laundering activities, the 7th meeting of the Advisory Group to the Follow-Up Committee of Sports Competitions Manipulation, and the POMPIDOU Group Law Enforcement Conference on Drug Control Networks in Strasbourg in November 2024.

Pillar 5: DEVELOPMENT OF MEDIA VISIBILITY

► Status: underway

- 5.1: In 2024, MONEYVAL enhanced its visibility through high-level engagement and public communication. The 67th and 68th MONEYVAL Plenary Meetings each brought together over 200 delegates from 50 jurisdictions. In the context of the release of its 2023 annual report, the MONEYVAL Committee called on its 33 member states and territories to improve the effective implementation of international standards on AML/CFT/CPF – highlighting the need for significant additional efforts especially with respect to effectively tracing and recovering criminal assets. While this messaging helps sustain pressure against money laundering,

further efforts are needed to clearly link this work to the protection of democratic values.

- 5.2: MONEYVAL does not have a specific visibility strategy as such, but all reports are automatically published online on the Council of Europe and the FATF websites, along with information about major events.

Pillar 6: RESOURCING OF MONEYVAL

► Status: underway

- MONEYVAL has made progress to varying extents under the basic objectives (1.1, 1.2, 1.3, 3.1, 3.2, 3.3, 4.1, 4.2, 5.1) and the development

objectives (1.4, 2.1, 2.2, 2.3, 2.4 with the exception of 5.2), all of which rely on extrabudgetary funding. A significant increase in voluntary contributions is essential to ensure full implementation of these development objectives. Continued financial support through voluntary contributions from member states remains critical. MONEYVAL gratefully acknowledged Romania for its voluntary contribution in 2024, the only one received during the year.



8. HUMAN RESOURCES

The Secretariat was headed by Livia STOICA BECHT, Executive Secretary, until 1 June 2024. On 1 June 2024, Lado LALICIC became the new Executive Secretary. At the end of 2024, the MONEYVAL Secretariat was comprised of the Executive Secretary, the Deputy Executive Secretary, six Council of Europe administrators, six administrators on secondment from national administrations (from Andorra, Armenia, Azerbaijan, Malta, Monaco and the United Kingdom), one legal assistant and three administrative

assistants. Seconded staff bring valuable expertise and perspectives from their respective jurisdictions to the MONEYVAL Secretariat. At the end of their term, each seconded staff will also have gained valuable experience, knowledge and skills that will benefit their respective government's efforts to tackle illicit financial flows. MONEYVAL would like to warmly thank the governments of the above countries for their support during 2024.



9. GOVERNANCE AND PROCEDURAL FRAMEWORK

The Council of Europe was the first international organisation to emphasise the importance of taking measures to combat the threats posed by ML for democracy and the rule of law. The Council's efforts led to the creation in 1997 of the Select Committee of Experts on the Evaluation of Anti Money Laundering Measures (PC-R-EV), later renamed to Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL). After the terrorist attacks of 11 September 2001, the Committee also began applying international standards designed to combat terrorist financing.

MONEYVAL is a permanent monitoring body of the Council of Europe reporting directly to the Committee of Ministers. MONEYVAL is entrusted with the task of assessing compliance with the principal international standards to counter money laundering and the financing of terrorism and the effectiveness of their implementation. It also makes recommendations to national authorities on necessary improvements to AML/CFT their frameworks.

9.1. MEMBERS AND OBSERVERS

Under Article 2 of the MONEYVAL Statute, MONEYVAL's evaluations extend to the following:

- ▶ Council of Europe member States that are not FATF members, or that joined the FATF but requested to remain under MONEYVAL's evaluation process. These include: Albania, Andorra, Armenia, Azerbaijan, Bosnia and Herzegovina, Bulgaria, Croatia, Cyprus, Czechia, Estonia, Georgia, Hungary, Latvia, Liechtenstein, Lithuania, Malta, Republic of Moldova, Monaco, Montenegro, North Macedonia, Poland, Romania, Serbia, San Marino, Slovenia, Slovak Republic, and Ukraine.
- ▶ Non-member States of the Council of Europe, as specified under Article 2.2e of the Statute: Israel (FATF member as of 2018); The Holy See (including the Vatican City State) (CM/Res(2011)5); The United Kingdom Crown Dependencies of Guernsey, Jersey, and the Isle of Man (CM/Res(2012)6); Gibraltar (United Kingdom Overseas Territory, CM/Res(2015)26). According to Article 3, paragraph 3 of MONEYVAL's Statute, the presidency of the FATF shall appoint to the meetings of MONEYVAL two members of the FATF, for a renewable term of office of two years. By letter of the FATF President, the current nominated FATF members are Germany and the United Kingdom.

In addition, the following countries, bodies, organisations and institutions have observer status with MONEYVAL and are entitled to send a representative to MONEYVAL meetings:

- ▶ the Parliamentary Assembly of the Council of Europe (PACE);
- ▶ the Council of Europe Development Bank (CEB);
- ▶ the European Committee on Crime Problems (CDPC);
- ▶ the Conference of the Parties of the Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (C198-COP);
- ▶ the European Commission and the Secretariat General of the Council of the European Union;
- ▶ States with observer status of the Council of Europe (Canada, Japan, Mexico and the United States of America);
- ▶ the Secretariat of the Financial Action Task Force (FATF);
- ▶ Interpol;
- ▶ the Islamic Development Bank;
- ▶ the International Monetary Fund (IMF);
- ▶ the United Nations Office on Drugs and Crimes (UNODC);
- ▶ the United Nations Counter-Terrorism Committee (CTC);
- ▶ the World Bank;
- ▶ the Commonwealth Secretariat;
- ▶ the European Bank of Reconstruction and Development (EBRD);
- ▶ Group of International Finance Centre Supervisors (GIFICS);
- ▶ the Organisation for Security and Co-operation in Europe (OSCE);
- ▶ the Egmont Group of Financial Intelligence Units;
- ▶ the Eurasian Group on Combating Money Laundering and Financing of Terrorism (EAG);
- ▶ any other FSRB which is or becomes an associate member of the FATF, on the basis of reciprocity;
- ▶ any member of the FATF.

9.2. BUREAU

The MONEYVAL Bureau is the key governance body of MONEYVAL. Its tasks include assisting the Chair, supervising the preparation of Plenary meetings and ensuring continuity between meetings. The MONEYVAL Bureau is composed of a Chair, two Vice-Chairs and two other Bureau members. The Bureau members as at the end of 2024 were:

MONEYVAL Bureau⁵

Chair:	Mr Nicola MUCCIOLI (San Marino)
Vice-Chairs:	Ms Astghik Karamanukyan (Armenia)
	Mr Matis Mäeeker (Estonia)
Members:	Ms Jennifer Palpacuer (Monaco)
	Daniel-Marius Staicu (Republic of Moldova)

9.3. SCIENTIFIC EXPERTS

MONEYVAL work is supported by a panel of independent scientific experts. The role of a scientific expert is to provide neutral, experienced opinions and to assist the Chair and Secretariat in ensuring the consistency of MONEYVAL's outputs. This includes, among others, fulfilling a quality control function for draft evaluation reports, attending all MONEYVAL Plenaries as well as enriching the debates with their experience and knowledge. In 2024, the scientific experts were:

MONEYVAL scientific experts

- ▶ Mr Lajos Korona, Public Prosecutor in Hungary – Legal scientific expert
- ▶ Mr John Ringguth, former Executive Secretary to MONEYVAL – Legal scientific expert
- ▶ Mr Andrew Strijker, former Head of the Dutch delegatin to FATF – Financial scientific expert
- ▶ Ms Lia Umans, former member of the FATF Secretariat – Law enforcement scientific expert
- ▶ Mr Ian Matthews, former supervisor in the United Kingdom, and former Co-chair of the FATF Evaluations and Compliance Group - Financial scientific expert

9.4. OBJECTIVES

The objective of MONEYVAL is to ensure that its evaluated jurisdictions have in place effective systems to counter money laundering and terrorist financing and comply with the relevant international standards in these fields. MONEYVAL endeavours to achieve this through the following methodological tools:

5. In December 2023 the Plenary elected Nicola Muccioli (San Marino) as Chair, Matis Mäeeker (Estonia) and Astghik Karamanukyan (Armenia) as Vice-Chairs, and Daniel-Marius Staicu (Republic of Moldova) and Jennifer Palpacuer (Monaco) as Bureau members.

Methodology

- ▶ Assessing compliance with all relevant international standards in the legal, financial and law enforcement sectors through a peer review process of mutual evaluations;
- ▶ Issuing reports which provide tailored and concise recommendations on ways to improve the effectiveness of domestic regimes to combat money laundering and terrorist financing and States' capacities to co-operate internationally in these areas;
- ▶ Ensuring an effective follow-up of evaluation reports, including Compliance Enhancing Procedures (CEPs), to improve levels of compliance with international AML/CFT standards by the States and territories which participate in MONEYVAL's evaluation processes;
- ▶ Conducting typologies studies of money laundering and terrorist financing methods, trends and techniques and issue reports thereabout.

9.5. MUTUAL EVALUATIONS ROUNDS AND FOLLOW-UP PROCEDURES

MONEYVAL has completed four rounds of mutual evaluations. In 2015, it commenced its 5th round of mutual evaluations, which is based on the FATF 2012 Recommendations and the 2013 Methodology for assessing technical compliance with the FATF Recommendations and the effectiveness of AML/CFT systems. For each round, evaluations of MONEYVAL Member States and territories give rise to mutual evaluation reports.

Mutual evaluation rounds

▶ 1st evaluation round (1998-2000)

The first round of mutual evaluations, based on the 1996 FATF Recommendations, was initiated in 1998 and onsite visits were concluded in 2000. 22 Council of Europe member States were evaluated in the first evaluation round.

▶ 2nd evaluation round (2001-2004)

This second round was also based largely on the 1996 FATF Recommendations and included evaluation against the FATF's Criteria for non-co-operative States and territories. MONEYVAL concluded its second round of onsite visits until 2003. 27 Council of Europe member States were evaluated.

▶ 3rd evaluation round (2005-2009)⁶

The third round of mutual evaluations was based on the 2003 revised FATF Recommendations. In addition, the evaluations reviewed aspects of compliance with the European Union's Third Anti-Money Laundering Directive, which came into force in 2007. 28 Council of Europe member States together with the Holy See/Vatican City State and Israel were evaluated in the third evaluation round.

▶ Follow-up evaluation round or "MONEYVAL's 4th Round" (2009-2014)

MONEYVAL commenced a follow-up round of onsite visits in 2009. For each country, these evaluations focused on the effectiveness of how a number of priority FATF recommendations were implemented, together with any recommendations for which the country received either a non-compliant or partially compliant rating in the third round. In addition, the evaluation also reviewed aspects of compliance with the EU's 3rd Anti-Money Laundering and Counter-Terrorist Financing Directive (Directive 2005/60/EC).

▶ 5th evaluation round (2015 - 2024)

The FATF 2012 Recommendations and the 2013 "Methodology for Assessing Compliance with the FATF Recommendations and the Effectiveness of AML/CFT Systems" constituted the basis of the 5th MONEYVAL round of evaluations. The round commenced in 2015, with the main emphasis on the effective implementation of the FATF Recommendations by States and territories, with each onsite visit lasting roughly between 10 and 14 days. The first MER report under this round was adopted in December 2015. By the end, thirty-three mutual evaluation reports were adopted.

▶ 6th Evaluation Round (2024- 2032)

The 6th round will assess members under the revised FATF Methodology and Universal Procedures adopted in 2023 and updated in 2024. The round will place greater emphasis on effectiveness, major risks and context, and include separate assessments of the financial and non-financial sectors. Recommendations will be more results-oriented, with shorter cycles, seven years for MONEYVAL, requiring increased resources to support high-quality evaluations and follow-up.

6. Although the third round of evaluations concluded in 2009, the Holy See (including Vatican City State) was subsequently evaluated in 2011, with the report being adopted in 2012 following the adoption by the Committee of Ministers on 6 April 2011 of Resolution CM/Res(2011)5.

APPENDICES










APPENDIX I

List of the 2012 FATF Recommendations and the 11 Immediate Outcomes in the FATF Methodology of 2013	
A. 2012 FATF Recommendations	
R.1	Assessing Risks and applying a Risk-Based Approach
R.2	National Co-operation and Co-ordination
R.3	Money laundering offence
R.4	Confiscation and provisional measures
R.5	Terrorist financing offence
R.6	Targeted financial sanctions related to terrorism and terrorist financing
R.7	Targeted financial sanctions related to proliferation
R.8	Non-profit organisations
R.9	Financial institution secrecy laws
R.10	Customer due diligence
R.11	Record-keeping
R.12	Politically exposed persons
R.13	Correspondent banking
R.14	Money or value transfer services
R.15	New technologies
R.16	Wire transfers
R.17	Reliance on third parties
R.18	Internal controls and foreign branches and subsidiaries
R.19	Higher-risk countries
R.20	Reporting of suspicious transactions
R.21	Tipping-off and confidentiality
R.22	DNFBPs: Customer due diligence
R.23	DNFBPs: Other measures
R.24	Transparency and beneficial ownership of legal persons
R.25	Transparency and beneficial ownership of legal arrangements
R.26	Regulation and supervision of financial institutions
R.27	Powers of supervisors
R.28	Regulation and supervision of DNFBPs

R.29	Financial intelligence units
R.30	Responsibilities of law enforcement and investigative authorities
R.31	Powers of law enforcement and investigative authorities
R.32	Cash Couriers
R.33	Statistics
R.34	Guidance and feedback
R.35	Sanctions
R.36	International instruments
R.37	Mutual legal assistance
R.38	Mutual legal assistance: freezing and confiscation
R.39	Extradition
R.40	Other forms of international co-operation

B. Immediate Outcomes	
IO1	Money laundering and terrorist financing risks are identified, assessed and understood, policies are co-operatively developed and, where appropriate, actions co-ordinated domestically to combat money laundering and the financing of terrorism.
IO2	International co-operation delivers appropriate information, financial intelligence and evidence, and facilitates action against criminals and their property.
IO3	Supervisors appropriately supervise, monitor and regulate financial institutions and VASPs for compliance with AML/CFT requirements, and financial institutions and VASPs adequately apply AML/CFT preventive measures, and report suspicious transactions. The actions taken by supervisors, financial institutions and VASPs are commensurate with the risks.
IO4	Supervisors appropriately supervise, monitor and regulate DNFBPs for compliance with AML/CFT requirements, and DNFBPs adequately apply AML/CFT preventive measures commensurate with the risks, and report suspicious transactions.
IO5	Legal persons and arrangements are prevented from misuse for money laundering or terrorist financing, and information on their beneficial ownership is available to competent authorities without impediments.
IO6	Financial intelligence and all other relevant information are appropriately used by competent authorities for money laundering and terrorist financing investigations.
IO7	Money laundering offences and activities are investigated, and offenders are prosecuted and subject to effective, proportionate and dissuasive sanctions.
IO8	Asset recovery processes lead to confiscation and permanent deprivation of criminal property and property of corresponding value.
IO9	Terrorist financing offences and activities are investigated and persons who finance terrorism are prosecuted and subject to effective, proportionate and dissuasive sanctions.
IO10	Terrorists, terrorist organisations and terrorist financiers are prevented from raising, moving and using funds.
IO11	Persons and entities involved in the proliferation of weapons of mass destruction are prevented from raising, moving and using funds, consistent with the relevant UNSCRs.

APPENDIX II

List of FATF-style regional bodies	
Asia/Pacific Group on Money Laundering (APG)	
Caribbean Financial Action Task Force (CFATF)	
Council of Europe Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL)	
Eurasian Group on Combating Money Laundering and Financing of Terrorism (EAG)	
Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG)	
Financial Action Task Force on Money Laundering of Latin America (GAFILAT)	
Inter-Governmental Action Group against Money Laundering in West Africa (GIABA)	
Middle East and North Africa Financial Action Task Force (MENAFATF)	
Task Force on Money Laundering in Central Africa (GABAC)	

The Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL) is a monitoring body of the Council of Europe entrusted with the task of assessing compliance with the principal international standards to counter money laundering and the financing of terrorism and the effectiveness of their implementation, as well as with the task of making recommendations to national authorities in respect of necessary improvements to their systems.

For more information on MONEYVAL, please visit our website: www.coe.int/moneyval

www.coe.int

The Council of Europe is the continent's leading human rights organisation. It comprises 46 member states, including all members of the European Union. All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law. The European Court of Human Rights oversees the implementation of the Convention in the member states.