



*Republic of Serbia  
Ministry of Finance*

*Administration for the Prevention of  
Money Laundering*

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*Counter Corruption Best Practices  
Increased Effectiveness through Interagency and  
Multi – Sectoral Approaches*

*Aleksandar Vujičić, Director*

*Zagreb, 7-10 March 2011*



# ***INTERNATIONAL AML/CFT LEGAL FRAMEWORK***

- ***UN Conventions (the most important conventions ratified by Serbia are: UN Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances of 1988 – Vienna Convention, Convention for the Suppression of the Financing of Terrorism of 1999 and Convention Against Transnational Organised Crime of 2000 - Palermo Convention)***
- ***Council of Europe Convention (Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime – Strasbourg Convention)  
Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and the Financing of Terrorism – Warsaw Convention***
- ***EU Directives (to date, EU has adopted three directives)***
- ***International AML standards are prescribed also by FATF (Financial Action Task Force). FATF document called “40 Recommendations + 9 Special Recommendations” is the main standard in AML area.***



# *SERBIAN AML/CFT FRAMEWORK*

- *Law on the Prevention of Money Laundering and Terrorism Financing*
- *Criminal Code – criminal offences of money laundering and terrorism financing, as well as confiscation of proceeds*
- *Criminal Procedure Code – investigation and prosecution, provisional measures*
- *National AML/CFT Strategy*
- *Law on Banks and other laws governing the financial system*



# ***ADMINISTRATION FOR THE PREVENTION OF MONEY LAUNDERING (APML)***

- *Financial Intelligence Unit - FIU*
- *Special body within the Ministry of Finance*
- *EGMONT Group member*
- *Council of Europe MoneyVal Committee member*
- *Observer in the Eurasian Group on Combating Money Laundering and Financing of Terrorism (EAG)*
- *26 MOUs (agreements concerning cooperation and exchange of information) signed with foreign FIUs*

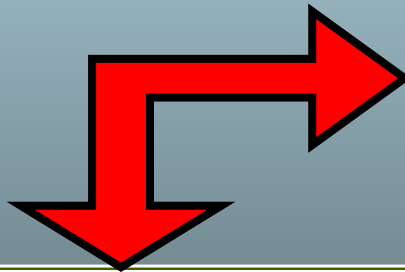


# *APML COMPETENCES*

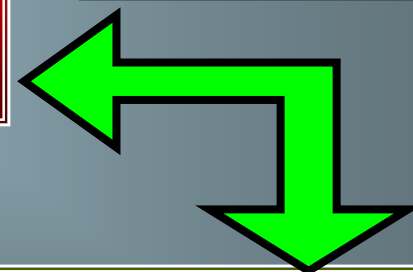
- *Collecting, processing, analyzing, and keeping of data and information from obligors (reporting entities) and competent state bodies*
- *Obtaining and requesting data and information from the competent state bodies required to determine whether there is suspicion on money laundering with respect to a transaction or a person*
- *Bilateral and multilateral cooperation, reciprocal exchange of data with foreign FIUs*
- *Providing the competent state bodies with data and information on transactions and persons suspected to be involved in money laundering*

# ***OBLIGORS***

*(Articles 4 and 5 of the Law)*



***Article 82***  
*Supervisors*



*Articles 54, 55, 58 and 59*

- Requesting of data*
- Initiative to start procedure*
- Dissemination*



# *APML cooperation with other bodies provided for in the Law*

***Art. 82***  
***Supervisors***

***APML***

*Articles 54, 55, 58 and 59*

- *Requesting of data*
- *Initiative to start procedure*
- *Dissemination*

- *National bank of Serbia;*
- *Securities Commission;*
- *ministry competent for trade inspection;*
- *Foreign Exchange Inspectorate;*
- *Games of Chance Administration;*
- *ministry competent for finance;*
- *ministry competent for postal communication;*
- *Bar Association.*

- *court*
- *public prosecutor*
- *police*
- *Security Information Agency*
- *Military-Intelligence Agency*
- *Military Security Agency*
- *Tax Administration*
- *Customs Administration*
- *National Bank of Serbia*
- *Securities Commission*
- *Privatisation Agency*
- *competent inspectorate and State bodies competent for State auditing and fight against corruption.*



# *Obligors – Article 4 of the Law*

*banks*

*authorised  
bureaux de change*

*investment fund  
management companies*

*voluntary pension fund  
management companies*

*financial leasing  
providers*

*insurance  
companies*

*postal service  
providers*

**APML**

*broker-dealer  
companies*

*organisers of  
games of chance in casinos*

*organizers of games of chance  
on the Internet*

*auditing companies*

*certified auditors*

*real estate agents*

*accounting service  
providers*

*tax advisers*

*credit  
intermediation*

*factoring and  
forfeiting*

*guarantee  
providers*

*money transfer  
services*



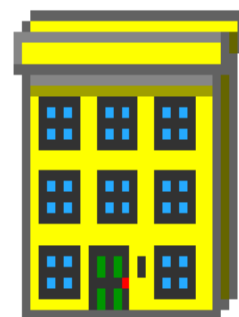
# *APML POWERS*

## *APML can:*

- *Order the obligor to suspend the execution of transaction – 72 hours plus 48 hours*
- *Order the obligor to monitor transactions on a bank account for 3 months, which may be extended up to 6 months*
- *Check internal databases of financial activities*
- *Request additional information from financial institutions, other obligors and State bodies in case of suspicion on money laundering*
- *Exchange information within international cooperation with foreign FIUs through the Egmont Secure Website (ESW)*

# JAVNE NABAVKE

DOBAVLJAČI USLUGA  
IZ INOSTRANSTVA



JAVNO PREDUZEĆE



DOBAVLJAČI ROBE  
U ZEMLJI



UPLATE NA RAČUNE

UPLATE NA RAČUNE



RAČUNI U INOSTRANSTVU  
EUR 1.200.000,00

PRENOS AKCIJA



AKCIJE U INOSTRANSTVU  
EUR 250.000,00

Link

MENADŽMENT



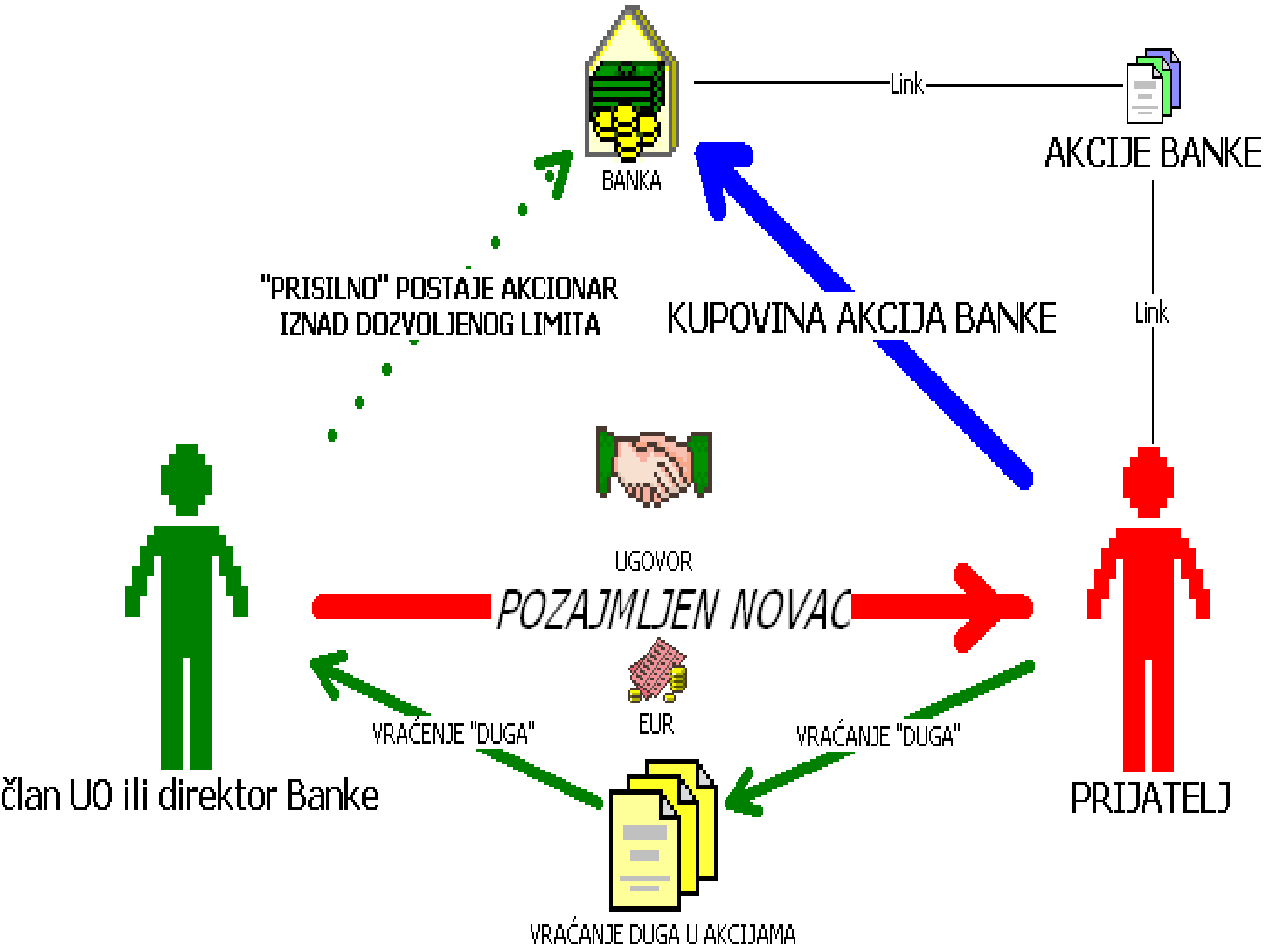
KUPLJENI STANOVİ 1

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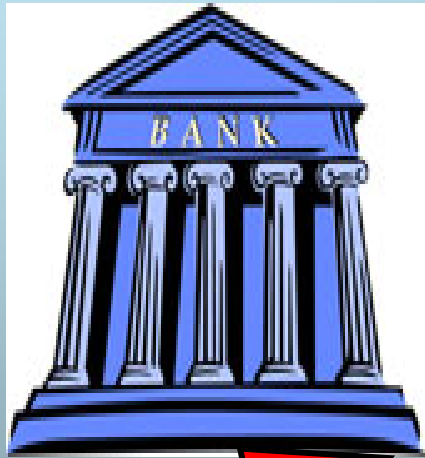
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KUPLJENI STANOVİ 2



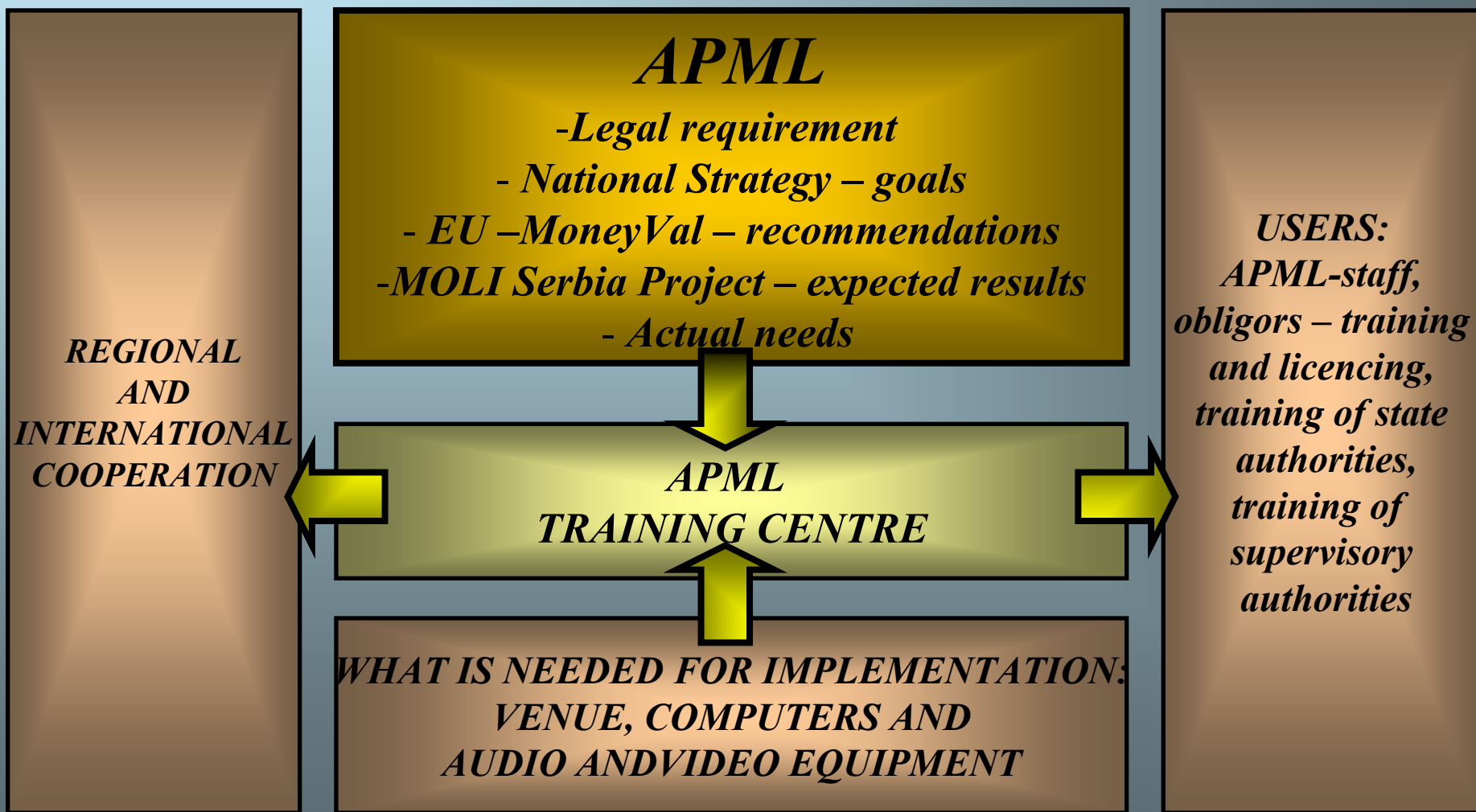
# ***PURCHASE OF CLAIMS***





# *Plans to enhance efficiency of the system for combat against money laundering and terrorism financing*

## *APML TRAINING CENTRE*





***THANK YOU FOR  
YOUR ATTENTION***