

DG Justice and Consumers – B3 Financial crime
Kallina SIMEONOFF



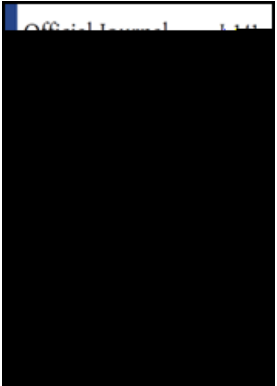
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Action Plan on TF published on 2 February 2016









- Scope: the risk assessment covers at least:
- Risk assessment published within 2 years after the adoption of the Directive (June 2017). Update every 2 years.
- Support from:



- _____: scope in line with the legal basis
- 2 Phases:



Sectors covered by 4AMLD:

- (1) credit institutions;
- (2) financial institutions;
- (3) the following natural or legal persons:
 - (a) auditors, external accountants and tax advisors;
 - (b) notaries and other independent legal professionals, when they participate in certain activities;
 - (c) trust or company service providers;
 - (d) estate agents;
 - (e) traders in goods (payment in cash >EUR 10 000);
 - (f) providers of gambling services;

Other Sectors/products at risk not yet included in 4AMLD
(e.g. virtual currencies, crowdfunding, cash, gold, NPOs)





: intent + capability

:

1. Inherent risk exposure

- speediness or anonymity of transactions, delivery channels, volume of transactions, cash involvement, management of new technologies/payment methods
- high-risk customers, management of BO risks
- high-risk areas, size of CB transactions

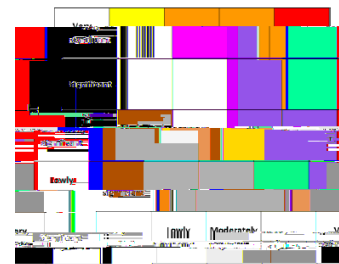
2. Awareness of the risk/vulnerability

- ; organisational framework
- ; LEA capacity to counter ML/TF
- and analysis

3. Legal framew stT >> BDCgal frame5(e)3(56-ontro)5(y)]s



- identification of the risks
- assessment of the threats
- assessment of the vulnerabilities
- Combination to identify the level of risks
- Identification of mitigating measures









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