



National Commission for the Implementation of the Strategy for the
Prevention and Suppression of Terrorism, Money Laundering and
Terrorism Financing

STRATEGY FOR THE PREVENTION AND SUPPRESSION OF TERRORISM, MONEY LAUNDERING AND TERRORISM FINANCING

The Government of Montenegro

Podgorica, 16/3/2015

ABBREVIATIONS

APMLTF	Administration for Prevention of Money Laundering and Terrorist Financing
CBM	Central Bank of Montenegro
CoE	Council of Europe
EU	European Union
FATF	Working group for financial measures against money laundering
HC	High Court
ME	Ministry of Economy
MF	Ministry of Finance
MIST	Ministry for Information Society and Telecommunications
MJ	Ministry of Justice
MO	Ministry of Defense
MoFAEI	Ministry of Foreign Affairs and European Integration MoFAEI
Moi/PA	Ministry of Interior/Police Administration
MONEYVAL	The Committee of Experts on the Evaluation of Anti-Money Laundering Measures of the Council of Europe
MT	Ministry of Transport
NATO	The North Atlantic Treaty Organization
NSA	National Security Agency
OSCE	Organization for Security and Co-operation in Europe
PMLTF	Prevention of Money Laundering and Terrorism Financing
SSPO	Supreme State Prosecutor's Office
UN	United Nation

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INTRODUCTION

The coordinated acting of the Montenegrin authorities resulted in the production of a new Strategy for the Prevention and Suppression of Terrorism, Money Laundering and Terrorism Financing¹ aimed at ensuring stability, the protection of life and property of citizens. The Strategy incorporated security interests of Montenegro by taking into account the commitments laid down in the Constitution of Montenegro, such as: freedom, equality, human rights, national and gender equality, social justice, property security, the preservation of nature and environment, the rule of law and democracy. The Strategy represents the second strategic document² that comprehensively shows the national policy of Montenegro in the prevention and suppression of terrorism, money laundering and terrorism financing, which covers the period 2015-2018.

Although the Strategy is primarily based on the principles and the values defined in the Constitution of Montenegro, it also follows and complements it with other strategic documents of Montenegro such as: the National Security Strategy, the Defense Strategy, the Strategy for Fight against Corruption and Organized Crime and the Strategy for the Control of Small Arms and Light Weapons.

In the context of achieving foreign policy goals of Montenegro - full membership in NATO and the European Union, and/or development of regional cooperation with neighboring countries, the need was recognized for the establishment of an adequate balance between the openness of the Montenegrin society in line with contemporary conditions featured by developing countries and its long-term stability and security. The aspiration to join the modern European and Euro-Atlantic communities that rely on the free movement of people, goods, services and capital, make Montenegro exposed to specific security threats, which requires putting maximum effort to identify all the mechanisms to mitigate the identified risks and/or defuse them.

Regarding the methodological approach in preparing this document, the Strategy is based on the situation analysis and projection of the development of international security integration, the characteristics of modern challenges and threats in the areas of terrorism, money laundering and terrorism financing, which is a prerequisite for determining strategic goals, as well as for planning future activities necessary for achieving the vision of the Strategy.

Situation analysis was carried out based on: reports and recommendations of relevant institutions; the analysis of statistical data obtained from reports: on suspicious cash transactions, the crimes, the crime situation and its manifestations, the predicate offenses and others. Also, the Strategy ensues the goals and values which are defined in the Global Counter-Terrorist Strategy of the United Nations and anti-terrorist strategy of the European Union (EU), as well as other basic anti-terrorist documents of the United Nations (UN), European Union (EU), North Atlantic Treaty Organization (NATO), the Organization for Security and Cooperation in Europe (OSCE) and the Council of Europe (CoE).

¹ Hereinafter referred to as the "Strategy".

² Previous version of the Strategy was valid for the period 2010-2014

Also, special attention has been focused on raising awareness of both state authorities directly involved in implementing this policy and the general public of importance of Montenegro as regards this issue and/or the importance of allocation of technical, human and financial resources for the realization of this Strategy. In this context, a special form of communication needs to be accomplished with the NGO sector and the media.

The purpose of creating this document is that Montenegro send a message that preventing and suppressing terrorism, money laundering and terrorism financing is not an issue that should be tackled purely by military, police and intelligence services, but the one that requires to strengthen the culture of keeping peaceful dialogue and inter-religious and intercultural tolerance.

DESCRIPTION OF THE CURRENT SITUATION IN MONTENEGRO AS REGARDS THE PREVENTION AND SUPPRESSION OF TERRORISM, MONEY LAUNDERING AND TERRORISM FINANCING

Montenegro developed the first Strategy for the Prevention and Suppression of Terrorism, Money Laundering and Terrorism Financing in 2010 which covers the period 2010-2014 by recognizing terrorism as one of the biggest security threats of the 21st century, as well as the criminal acts of money laundering and terrorism financing,

The Implementation of the 2010 Strategy was accomplished by implementing measures envisaged in two two-year Action Plans³. The implementation of the Strategy and Action Plans was monitored by the National Commission comprised of representatives from: the Ministry of Defense, the Ministry of Interior, the Ministry of Foreign Affairs and European Integration, the Ministry of Finance, Police Administration, the National Security Agency, the Administration for Prevention of Money Laundering and Terrorist Financing, the Supreme State Prosecutor's Office/Special Prosecutor for Suppressing Organized Crime, Corruption, Terrorism and War Crimes, the High Court of Podgorica, and the General Secretariat of the Government of Montenegro.

For the purpose of more adequate work at the operational level, in the context of current events and quality, coordinated and harmonized acting of the competent authorities in preventing and combating terrorism, money laundering and terrorism financing, the implementation of the previous Strategy was facilitated by the activities of the working team on the operational and expert level. Their communication was established on an everyday basis with the aim of exchanging information, the implementation of measures and/or timely informing the relevant authorities about potential or real threats and/or the results achieved in the field of capacity building and operational security structures in this area.

The importance of the implementation of this policy and the need for a coordinated multi-authority acting strengthens the commitment of the main relevant institutions to continue to undertake activities in the area of improving the legal and institutional framework for the fight against terrorism, money laundering and terrorism financing by improving the technical and administrative capacities in this area, raising awareness in officials of all relevant government bodies with powers to respond to these issues and develop a constant and focused cooperation between the institutions involved at national, regional and international levels. Accordingly, special attention must be focused on the strengthening of international cooperation, providing technical assistance to strengthen the Montenegrin capacities in these fields of activity.

Montenegro can be proud of developed multiculturalism awareness of its society and the coexistence of different nations, religions and ethnicity. Montenegro is a country of citizens and so far there has not been the commission of acts of terrorism or acts of violence against individual ethnic, religious or other groups. Therefore, it is not committed or registered any act with the elements which could be marked as a terrorist and/or act with elements which could have direct consequences for the life and property of citizens and the state.

³ Action Plan 2010-2012 and Action Plan 2013-2014

On the territory of Montenegro as of mid-2014, there has not been committed one single crime that could be classified as terrorism. There is no corroborating information that Montenegro is used for the preparation of such acts, however, such information is not excluded but identified as a security risk and a threat against which should be acted preventively.

VISION AND MISSION

Indiscriminate objectives of endangering the security of citizens and their property are criminal activity as defined by the Criminal Code of Montenegro and, as such, can not be justified under any circumstances. By creating a new Strategy, the intention is to show Montenegro's commitment to work together with other countries and international organizations throughout the process of European and Euro-Atlantic integration in order to strengthen security at the national, regional and global levels.

In this context, our vision to be realized is:

Citizens and values of Montenegro protected against terrorism, money laundering and terrorism financing.

The stated vision will be reached by implementing the following mission:

Montenegro has built a coordinated and efficient system for the control and prevention of terrorism, money laundering and financing of terrorism based on the latest standards, while respecting human rights, and cooperation between the relevant institutions at national, regional and international levels.

STRATEGIC OBJECTIVES

Production of this document was dictated by estimated risks and threats to the security of the citizens of Montenegro in terms of the assessment of the terrorist attacks, money laundering and terrorism financing. In this context, all the activities undertaken at the internal and international levels of the relevant state authorities of Montenegro should be directed to meet the following strategic objectives:

- ❖ Promoting democratic values, respecting human rights, gender, ethnic and inter-religious tolerance and equality, combating radicalism timely identify the causes that encourage citizens to turn to terrorism;
- ❖ Modernizing state borders, major infrastructure and transport facilities, protecting citizens and their property;
- ❖ Developing new and enhancing existing capacity of the relevant government authorities that aim to minimize the consequences of a terrorist attack;
- ❖ Improving communication and coordination of competent authorities, who know how to adequately respond i.e. to react against extremists and all persons who provide the extremists with the logistical, financial and every other kind of support;
- ❖ Prosecuting terrorists and persons who provide support to terrorists (logistical or financial) and bringing them to justice;
- ❖ Improving cooperation at national, regional and international level, contributing to the fight against terrorism, money laundering and financing of terrorism.

I TERRORISM

Terrorism, the biggest security threat of the 21st century, is a challenge for any country that has to direct its security resources in this area on two tracks: preventive actions on the occurrence of each aspect of radical/extremist ideologies that threaten the security of citizens and their property and adequate response with all available means on any act that could be characterized as a crime of terrorism in order to protect the national security of Montenegro and its citizens.

1 Legal and institutional framework for preventing and suppressing terrorism

1.1 National legal framework

Establishing contemporary and comprehensive legislative framework, in accordance with relevant international standards, is a key precondition for effective prevention and suppression of terrorism.

The authorities responsible for the prevention and suppression of terrorism engage in constant evaluation of the efficacy of the legal framework and take care of the promotion in accordance with needs. Several laws pertaining to this criminal-legal area or referring thereto regulates the jurisdiction, powers and actions of government authorities involved in the fight against terrorism as follows:

- Criminal Code (Official Gazette of the Republic of Montenegro 70/03 and 47/06 and Official Gazette of Montenegro 40/08, 25/10, 32/11, 40/13 and 56/13);
- Criminal Procedure Code (Official Gazette of Montenegro 57/09, 49/10 and 47/14);
- Law on Public Prosecution Office (Official Gazette of the Republic of Montenegro 69/03 and 40/08 and Official Gazette of Montenegro 40/08, 39/11 and 46/13);
- Law on Courts (Official Gazette of the Republic of Montenegro 5/02, 49/04 and Official Gazette of Montenegro 22/08, 39/11, 46/13 and 48/13);
- Law on Internal Affairs (Official Gazette of Montenegro,44/12, 36/13 and 1/15);
- Law on Defense (Official Gazette of Montenegro 86/09, 88/09, 25/10, 40/11 and 14/12);
- Law on the Armed Forces of Montenegro (Official Gazette of Montenegro 88/09, 75/10, 40/11 and 32/14);
- Law on the Basic Principles of Intelligence and Security Sector (Official Gazette of Montenegro 28/14);
- Law on Prevention of Money Laundering and Terrorist Financing (Official Gazette of Montenegro number 33/14);
- Law on the National Security Agency (Official Gazette of the Republic of Montenegro 28/05 and Official Gazette of Montenegro 86/09, 73/10, 20/11 and 08/15);
- Law on Asylum (Official Gazette of the Republic of Montenegro, 45/06, 73/10 and 40/11);
- Law on Border Control (Official Gazette of Montenegro 72/09, 39/13);
- Law on Foreigners (Official Gazette of Montenegro 56/14);
- Law on Travel Documents (Official Gazette of Montenegro 21/08, 25/08 and 39/13);
- Law on Personal Data Protection (Official Gazette 79/08, 70/09 and 44/12);

- Law on Classified Information (Official Gazette 14/08, 76/09, 41/10, 40/11, 38/12, 44/12 and 14/13).

1.2 International legal framework

Montenegro is a signatory to a large number of conventions addressing the area of the fight against terrorism and which were adopted by the Organization of the United Nations and the Council of Europe. In order to join the European Union, Montenegro implements Common Position 2001/931 / CFSP referring to the implementation of specific measures against terrorism. In this regard, Montenegro also improves cooperation, in accordance with Resolution 1373 (2001), Resolution 1535 (2004), Resolution 1624 (2005), Resolution 2178 (2014) and other relevant UN resolutions, international conventions and other instruments. Through its Permanent Representative, Montenegro is actively cooperating with the UN Security Council Counter-Terrorism Committee (CTC), established by Resolution 1373 (2001) and it also implements the UN Security Council Resolution 1540, according to prepared Action Plan. Acting within various international organizations – especially the United Nations and the Council of Europe, Montenegro has become a Contracting Party to a number of international – legal instruments, attached to Annex I.

Agreements on mutual legal assistance and extradition are also of great importance for the successful implementation of mechanisms to fight terrorism. These agreements represent the basis for cooperation between the legislative, judicial and executive authorities in different countries while running joint investigations and extradition of suspected, accused persons.

1.3 Institutional framework

Ministry of Foreign Affairs performs administrative affairs related to: situation analytical monitoring and strategic planning in the area of fight against crime, public order and peace, traffic safety and other areas of police work and actions, instructive action for the implementation of strategies and policies in these areas; oversight and internal control over the performance of police duties and procedures, expertise, legality and efficiency of the police work; proposing, monitoring and implementation of mechanisms for efficient fight against human trafficking; citizenship, travel documents, immigration, asylum granting, naturalization, Identification Cards, residence and related to this, proper records keeping; Unique Identification Number, name, civil registers; vehicles and drivers records; procuring weapons and weapons parts; armament, military equipment and dual-use goods transportation by land and water; personal data protection; production, trade and transport of explosive substances; trade, transport and storage of flammable liquids and gases; transportation of non-flammable, hazards liquids and gases, explosives transport; risk management, management of protection and rescue in emergency situations and emergencies recovery management (earthquakes, fires and other natural and technical and technological disasters); Civil Protection Affairs, as part of an integrated disaster management system; state administration area related to organization, way and methods of operation, management, responsibilities, relations, cooperation, public and transparency of administration bodies work; the area of civil servants relations, office management, general administrative procedure and inspection; inspection within the competencies and authorizations as defined by regulations on the

state administration system, labor relations in the state administration bodies and local self-government and administrative decision; NGOs, political parties, record notifications on religious communities; seals of state bodies; organization and authority of local self-government, functioning and implementation of the provisions related to local self-government that come within this Ministry competence, the territorial organization of local self-government, international cooperation of local self-government units with other countries local self-government units; implementation of international agreements within the competence of the Ministry; giving opinion on draft laws and other regulations or general documents concerning matters related to state administration and local self-government, as well as on the draft laws regulating derogations from general administrative procedure; state border security; integrated border management, organization and financing of construction, reconstruction, modernization and maintenance of border crossings; the boundary line in terms of the Ministry competence; mid-term program and annual plans strategy development for border crossings management; leasing of facilities or parts of facilities at border crossings; harmonization of national legislation that comes within its competence with the legal order of the European Union; cooperation with international and regional organizations; keeping proper records; administrative supervision in the areas for which the Ministry is established, as well as other affairs that come within its competence.

Ministry of Justice performs tasks of the state administration relating to: criminal legislation, international legal assistance; the preparation of strategies, projects and programs and monitoring their implementation; preparation of necessary reports and measures for the implementation of ratified conventions in the field of judiciary; preparation and implementation of international agreements in the field of international assistance; preparation of laws and secondary legislation and their implementation, which are related to the organization, jurisdiction and work of courts, public prosecutor and misdemeanor authority, attorneys and legal assistance.

The Ministry of Defence proposes Defence Plan of Montenegro; proposes organizational-formation structure and the size of the Armed Forces; determines the content and method of making the Defence Plan of Montenegro; ensures the implementation of decisions and other acts of the President of Montenegro and the Government concerning the affairs of the defense system; executes defined defense policy; organizes and performs international cooperation in the field of defense; organizes electronic communication and data protection for the needs of the defense system; organizes and carries out military intelligence, counterintelligence and security activities; performs other duties in accordance with the law. **Division for Military Intelligence and Security Affairs**, as an organizational unit of the Ministry of Defence, organizes and carries out military intelligence, counterintelligence and security activities of the Ministry and Armed Forces.

The Agency for National Security collects data and information, through the use of special methods and means determined by law, on potential threats, plans or intentions of organizations, groups and individuals that are directed against the territorial integrity, security and the national legal order determined by the Constitution, and draws attention to the potential challenges, risks and threats to security.

The Armed Forces of Montenegro in accordance with the Defense Strategy of Montenegro and the Law on Defense, among other things, are responsible for tasks relating to: assisting the Police Directorate in the fight against terrorism and supporting civil authorities during natural or man-made disasters and other emergencies.

Police Directorate performs tasks related to: protecting the safety of citizens and constitutionally established rights and freedoms; protection of property; prevention and detection of crimes and offenses; locate and capture the perpetrators of crimes and offenses and bringing them before the competent authority; the maintenance of public order and peace; security of public meetings and other gatherings of citizens; security of certain persons and facilities; monitoring and control of security of traffic; surveillance and securing the state border and performing of border control; control of movement and stay of aliens; providing conditions for undisturbed work of courts, maintenance of order, protection of persons and property; crime investigation and analysis, criminal and other records; international police cooperation; preparation of analyzes, elaborations, studies and monitoring of certain security issues; as well as other activities within its competence.

The Administration for Prevention of Money Laundering and Terrorism Financing in accordance with the Law on Prevention of Money Laundering and Terrorism Financing, performs tasks of the Administration related to detecting and preventing money laundering and terrorism financing determined by this Law and other regulations. The Administration for Prevention of Money Laundering and Terrorism Financing is organized as a financial intelligence service of an administrative type. The Administration is responsible for tasks related to detecting and preventing money laundering and terrorism financing related to gathering, analyzing and submitting to the competent bodies of data, information and documentation necessary for the detection of money laundering and terrorism financing.

The Directorate for Protection of Classified Data in accordance with the Law on Data Confidentiality, organizes performance of tasks related to sharing classified information with foreign countries and international organizations, through the Central Registry, performs the tasks of issuing permits for access to classified data of natural (Personal Security Clearance) and legal persons (Facility Security Clearance), as well as inspection control of the implementation of the Law and the application of international agreements. In accordance with the Agreement on Security of information, in its part related to the exchange and protection of NATO classified information, the Directorate has been marked as NSA (National Security Authority).

The Supreme Public Prosecutor's Office established, for the tasks of suppressing corruption, the Division for Suppressing Organized Crime, Corruption, Terrorism and War Crimes, headed by the Special Prosecutor, which acts before the High Courts. The Division manages the pre-trial proceedings, directs the work of the Police Directorate and takes the necessary measures for the purpose of detection of criminal acts within its jurisdiction; requires an investigation, brings and represents indictments, and takes other actions stipulated by law, with a view to seizure and confiscation of assets and material benefits acquired through criminal acts.

The Specialized Division of the High Court in Podgorica and Bijelo Polje is responsible for trials in criminal cases of organized crime, corruption, terrorism and war crimes.

Other government authorities in coordination with the main bearers of implementation of this strategy participate, within the scope of their jurisdiction and if necessary, in prevention and suppression of terrorism.

1.4 Terrorism Suppression and prevention

Fulfilling the vision of a safe society fight against terrorism will be carried out in five areas:

- Terrorism prevention
- Terrorism suppression
- Protection
- Remediation of damage from terrorist attacks
- The criminal prosecution of persons and entities linked with the criminal act of terrorism

Preventing terrorism is related to timely take actions in order to prevent an individual or group to commit an act of terrorism. In addition to the extremely positive developments that globalization has brought, such as the speed of information transfer, active communication and the daily development of information technology, by using these resources allowed easier access to radical ideas, as well as easier to get in touch with individuals / groups who will provide training or finance for violent enforcement of these radical ideas or terrorist attack. In order for an individual to get involved in terrorism it is necessary to carry out certain activities so that the realization of such ideas is greatly strengthened by the process of globalization.

Montenegro is a successful example of a country in Europe which is characterized by multiculturalism. Within Montenegrin borders for years have been living different peoples, ethnic groups, religions. All of them together, their traditions and culture have contributed to today's way of life in these areas. However, the lack of political or economic perspective, the lack of opportunities for education, and rapid but uncontrolled modernization may negatively affect certain individuals, who may turn to radical ideologies that lead to extremism with the aim of violent actions against the lives and property of the citizens of Montenegro, which is a risk to the security of Montenegro.

"Successful communication between different cultural models is a major challenge, because culture implants in people the way of thinking, of seeing things, hearing and interpretation of resolved. The same word can have (and usually have) different meanings for people of different cultures, even though they speak the same "language". If the cultural models seem similar, the more difficult is to define precisely the potential points of disagreement / conflict and preventively act on them. Understanding and cooperation between different cultural models in a broader territorial, national or global environment is only possible if there is an effective mechanism for overcoming intercultural conflict (a potentially possible in every multicultural, that is, in practically every society)."⁴

In order to improve the values of Montenegrin society and to establish a balance between the positive and negative effects of globalization, it is necessary to timely detect unwanted activities by involving all available resources of Montenegro, of the relevant Government departments (intelligence, counter intelligence, police, military), to the inclusion of all political, intellectual and academic community, civil society, and the media to promote and to continue to promote tolerance and coexistence of different cultures that have settled on the winds of history on today's territory of Montenegro.

⁴ Hamdija Šarkinović „*Multiculturality in Montenegro*“, MATICA, Winter 2013/Spring 2014

It is necessary to take measures that will promote the respect for human rights, prevent activities on promoting radical/extremist ideologies, establish a firm legal framework to prevent agitation and recruitment of Montenegrin citizens to go to the foreign battlefield (so called, foreign fighters), prevent their access to terrorist training and strengthen cooperation in this area with partner countries at regional and international level.

In addition to the security of the citizens of the utmost importance is taking measures in order to protect and defend key facilities in Montenegro. Here above all should be taken into account to reduce their vulnerability of possible attack, respectively the reduction of the effect of the performed attacks on certain buildings.

Also, in order to prevent the free movement of terrorists and terrorist groups it is necessary to further strengthen border control of the state and that through strengthening land, sea and air safety; strengthen the capacity of the Border Police and the Customs Administration, as well as take into account the security of travel and identity documents.

Social and political stability, as well as long-term economic development have a direct impact on the system of defense and security. Therefore, it is of vital importance to improve the capacity of all the systems of defense and security in order to combat terrorism, in order to identify needs for the prevention of conflicts and violent extremism. Poverty reduction and social development is possible only if there are institutions and mechanisms that can provide security and safety of citizens. Therefore, to this issue must be given constant and long-term care.

Having regard to the positioning of Montenegro as an attractive tourist destination globally, as well as previous international experience that has shown that the aim of terrorist is to threaten the lives of as many innocent people in one place, especially in places such as airports, railway stations, bus stations, ports, aircraft and other vehicles, independently and in cooperation with international partners, it is necessary to work on raising standards in the safety transportation of people and goods. This primarily means improving the protection of air, sea, road and rail infrastructure (airports, ports, tunnels, bridges, etc.) from the threat of terrorism.

In order to protect the transport infrastructure it is necessary to carry out safety researches in the context of terrorism, with special emphasis on reducing the vulnerability of physical and electronic attacks. Also, it is necessary to invest resources in the development and improvement of the information technologies used in the exchanging datas on passengers, recording travel documents, by starting in the border the protection of our citizens.

Using research efforts and experience of the European Union, the competent institutions should strengthen the quality of work and coordination when developing methodologies for the protection of public places with a large number of visitors (public gatherings, concerts, sports events, events, etc).

No country today can claim to be immune to terrorism. The risk of a terrorist attack always exists and responsible institutions must build up capacities that will be able to properly respond to them.

The consequences of terrorist attacks, often, can be identified with the consequences incurred as a result of natural disasters or technological accidents. Therefore, the system of control and

management of the consequences of natural or artificially challenged disasters can also be used to mitigate the effects of a terrorist attack. In such situations it is necessary to fully use the existing capacities of all institutions whose responsibilities include this activity. Bearing in mind the aspirations of Montenegro in the context of EU and NATO integration, it is necessary to work on developing the interoperability of our defense-security structure with the EU and NATO crisis coordination arrangements ensuring the coherent response of a terrorist attack.

As for the perpetrators of this criminal act, Montenegro will apply domestic and international legal obligations relating to terrorism. In this connection, persons who carry out the activities of propagation and incitement to terrorism, recruitment of Montenegrin citizens for terrorist attacks, logistical support and funding for criminal acts of terrorism, will be processed and prosecuted in accordance with the Criminal Code of Montenegro. The law enforcement and the courts will implement their activities with respect for fundamental human rights and freedoms, as well as provisions of international law.⁵ Also, Montenegro will continue to develop national capacities and mechanisms required for the adequate prosecution of perpetrators/accomplices of the crime of terrorism.

1.5 The goals that need to be worked out in the Action Plan for implementing the Strategy

TERRORISM PREVENTION	
Goal 1	The harmonization of national legislation with international legal legacy;
Goal 2	Strengthening of personnel, material technical capacities relevant to state bodies;
Goal 3	Development and improvement of administrative capacities of relevant state bodies;
Goal 4	Strengthening of intelligence capacities of Montenegro;
Goal 5	Strengthening cooperation between the police and the community in order to prevent extremism and radicalization that leads to terrorism;
TERRORISM SUPPRESSION	
Goal 6	Improved mechanisms for making assessment of the threat of terrorism;
Goal 7	Improved mechanisms to monitor the spread of religious radicalism and extremist actions of individuals and groups in Montenegro;

⁵ In Montenegro, the basis for indicating the international legal assistance in criminal matters is contained in multilateral and bilateral international agreements, as well as in the Law on international legal assistance and Criminal Procedure Code. International judicial cooperation in criminal matters is realized on the basis of the 26 multilateral agreements of Council of Europe and the United Nations. In addition, legal assistance in criminal matters is regulated by bilateral international agreements.

PROTECTION AGAINST TERRORISM	
Goal 8	Improved mechanisms for developing and strengthening the protection of infrastructure facilities of special importance in the territory of Montenegro;
Goal 9	Improved mechanisms for strengthening the system of protection and surveillance of the state border;
Goal 10	Improved control system of traffic, warehousing and storage of weapons, explosives and other assets that can be used for terrorist attacks and the use of dual-use goods;
Goal 11	Improving security in land, water and air transport;
CRIMINAL PROSECUTION	
Goal 12	Efficient criminal prosecution and prosecution of the perpetrators, accomplices and other persons who are in any way linked with terrorist activities;
REMEDICATION OF DAMAGE FROM TERRORIST ATTACKS	
Goal 13	Improved and developed national capacities necessary for recovery from consequences of attacks and revitalization of damaged systems;
Goal 14	Developed mechanisms for rescuing people, material and cultural goods and the environment;

II MONEY LAUNDERING AND TERRORISM FINANCING

One of the key preconditions for the preparation of terrorist activities and their implementation is the provision of financial resources. These resources are usually acquired in an illegal manner. Money laundering and terrorism financing are global problems, which have negative effects on economic, political, security and social structure of each country. The consequences of money laundering and terrorism financing are: undermining the stability and efficiency of the financial system of the country, economic disruptions and instability, jeopardizing the planned reforms, a decrease of investment security and investment and jeopardizing both, national and international security.

2.1 The legal national and international framework for preventing and suppressing money laundering and terrorism financing

Given that money laundering is a criminal activity with a high degree of social danger, and that this criminal act is very difficult to detect and prove, the fight against money laundering and terrorism financing also includes strengthening administrative, technical, personnel and material conditions for work of the institutions for fight against money laundering and terrorism financing. Montenegro is making great efforts to create appropriate legal requirements and to strengthen the institutions involved in the system for prevention of money laundering and terrorism financing. These institutions are: Ministry of Finance, the Judiciary and Prosecutor's Office, Police Directorate, Administration for Prevention of Money Laundering and Financing Terrorism, Agency for National Security, Customs Administration, and Tax Administration. Jurisdiction, competences and actions of the above-mentioned state authorities participating in the fight against money laundering and terrorism financing are regulated by several laws related to this criminal-law field:

- Law on Prevention of Money Laundering and Terrorist Financing (Official Gazette of Montenegro 33/14);
- Criminal Code (Official Gazette of the Republic of Montenegro 70/03, 47/06 and Official Gazette of Montenegro 40/08, 25/10);
- Criminal Procedure Code (Official Gazette of Montenegro 57/09 and 49/10 and 47/14);
- Law on Banks (Official Gazette of Montenegro 17/08, 44/10 and 40/11);
- Customs Law (Official Gazette of the Republic of Montenegro 7/02, 38/02, 72/02, 21/03, 29/05, 66/06 and Official Gazette of Montenegro 21/08);
- Law on Insurance (Official Gazette of the Republic of Montenegro 78/06, 19/07 and Official Gazette of Montenegro 53/09, 73/10, 40/11, 45/12 and 06/13);
- Law on Voluntary Pension Funds (Official Gazette of the Republic of Montenegro 78/06 and 14/07);
- Law on Financial Leasing (Official Gazette of the Republic of Montenegro 81/05 and Official Gazette of the Republic of Montenegro 73/10 i 40/11);
- Law on Games of Chance (Official Gazette of the Republic of Montenegro 52/04 and Official Gazette of Montenegro 13/07, 73/10, 40/11 i 63/13)
- Law on Securities (Official Gazette of the Republic of Montenegro 59/00, 10/01, 43/10, 28/06 and Official Gazette of the Republic of Montenegro 53/09, 73/10, 40/11 and 06/13);
- Law on Investment Funds (Official Gazette of the Republic of Montenegro 54/11);

- Law on Education in Judicial Bodies (Official Gazette of the Republic of Montenegro 27/06);
- Law on Accounting and Auditing (Official Gazette of the Republic of Montenegro 69/05 and Official Gazette of Montenegro 80/08, 32/11);
- Law on Payment System (Official Gazette of Montenegro 62/13 i 06/ 14);
- Law on State Audit Institution (Official Gazette of the Republic of Montenegro 28/04, 27/06, 78/06 and Official Gazette of Montenegro 17/07, 73/10, 40/11, 31/14);
- Law on the Central Bank of Montenegro (Official Gazette of the Republic of Montenegro 52/00, 53/00, 47/01 and Official Gazette of Montenegro 40/10 and 46/10, 06/13);
- Law on International Legal Assistance in Criminal Matters (Official Gazette of Montenegro 4/08, 36/13);
- Law on Managing Seized and Confiscated Assets (Official Gazette of Montenegro 49/08, 31/12);
- Law on Criminal Liability of Legal Persons (Official Gazette of Montenegro 2/07, 13/07 and « Official Gazette of Montenegro 30/12);
- Law on the State Property (Official Gazette of Montenegro 21/09, 40/11)
- Law on the Prevention of Money Laundering and Terrorism Financing has been harmonized with the requirements of international organizations and institutions and relevant regulations on the prevention of money laundering and terrorism financing, as follows:
 - FATF (40 +8 +1) New Recommendations;
 - MONEYVAL Recommendations (Measures against money laundering and terrorism financing of European Council),
 - Directive 2005/60/EC of the European Parliament and of the Council of 26 October 2005 on the prevention of the use of the financial system for the purpose of money laundering and terrorism financing;
 - Direktive 2006/70/EC of 1 August 2006, who set up measures for the implementation of Directive 2005/60 / EC of the European Parliament and the Council regarding the definition of "politically exposed person" and the technical criteria for simplified procedure of identity verification and monitoring of the client's business and for exemptions based on the financial activities carried out occasionally or on very limited basis (32002L0092);
 - International UN Convention on Suppresion of Terrorism Financing;

In that sense, Montenegro will continue to work on harmonization with the relevant international regulations that define the area PMLTF, such as:

- MONEYVAL Recommendations,
- FATF New Recommendations,
- Directive 2005/60/EC of the European Parliament and of the Council of 26 October 2005 on the prevention of the use of the financial system for the purpose of money laundering and terrorism financing;
- (32005L0060),
- Direktive 2006/70/EC of 1 August 2006, who set up measures for the implementation of Directive 2005/60 / EC of the European Parliament and the Council regarding the definition of "politically exposed person" and the technical criteria for simplified procedure of identity

- verification and monitoring of the client's business and for exceptions based on the financial activities carried out occasionally or on very limited basis (32002L0092),
- International UN Convention on Suppression of Terrorism Financing adopted in 9 December 1999.

The competent authorities of systems for preventing money laundering and terrorism financing will draft a National Risk Assessment of money laundering and terrorism financing for the upcoming period, which will identify, evaluate, and understand the risks of money laundering and terrorism financing in Montenegro, and on that basis will adopt appropriate measures in order to minimize the identified risks. The significance of National Risk Assessment is reflected in the guidance of material, technical and human resources of the country to the areas of greatest risk.

In order to fulfill the obligations of Montenegro in the accession negotiations with the EU and improve the institutional and legal framework in the area of money laundering and terrorism financing, Montenegro will adopt and implement the recommendations of the Working Group for Financial Action on Money Laundering (FATF), based on which will be performed analysis and amendments in laws and regulations concerning the possible misuse of non-profit organizations to finance terrorism.

On its way towards improving the legislative framework and accepting international standards in the fields of prevention and suppression of money laundering and terrorism financing, the starting point for Montenegro will be the exchange of existing experiences and information on the types and ways of sharing intelligence information of relevant institutions of the regional countries. Bearing in mind that these phenomena exceed national borders, the countries of the region took a unique position that financial intelligence services shall be the proponents of the development of systems for the fight against money laundering and terrorism financing.

Montenegro will contribute in suppressing money laundering and terrorism financing at the regional and global levels by fulfilling the obligations arising from membership in international organizations, as well as via intensive cooperation with the competent authorities of other countries through exchange of information.

2.2 The goals that need to be worked out in the Action Plan for implementing the Strategy

MONEY LAUNDERING AND TERRORISM FINANCING	
Goal 15	Established risk assessment from money laundering and terrorism financing;
Goal 16	Improvement of normative and legal framework;
Goal 17	Developed personnel, material and technical capacities;
Goal 18	Improved institutional cooperation aimed at efficient exchange of information;
Goal 19	Improved international cooperation;

Goal 20	Strengthening capacities through implementation of training and specialisation;
Goal 21	Applied MONEYVAL recommendations;
Goal 22	Strengthening the supervision over the obligated parties of the Law on PMLTF;

IMPLEMENTATION OF THE STRATEGY FOR PREVENTION AND SUPPRESSION OF TERRORISM, MONEY LAUNDERING AND TERRORISM FINANCING

Implementation of the Strategy includes coordinated action by all relevant state bodies involved in the fight against terrorism, money laundering and terrorism financing.

In accordance with the Strategy 2010-2014 implementation dynamic, the Minister of Defence established the National Commission for the Implementation of the Strategy for Prevention and Suppression of Terrorism, Money Laundering and Terrorism Financing, which will continue to monitor the implementation of this Strategy 2015-2018 as well.

The task of the National Commission is to:

- Manage, organize, coordinate and monitor the activities of state bodies, state administration bodies and other relevant institutions concerning the implementation of the Strategy for Prevention and Suppression of Terrorism, Money Laundering and Terrorism Financing;
- Set priorities, dynamic and implementation deadlines and evaluate the results achieved in the implementation of this Strategy, activities and measures arising from the Action Plans;
- If necessary, submit to the Government of Montenegro reports on activities implemented, providing the assessment of the situation and a proposal for further measures and at least twice a year.

National Commission is composed of state bodies' representatives, in charge of national policies implementation concerning the fight against terrorism, money laundering and terrorism financing:

- Ministry of Defence
- Ministry of Interior
- Ministry of Justice
- Ministry of Finance
- Ministry of Foreign Affairs and European Integration
- National Security Agency
- Police Administration
- Administration for Prevention of Money Laundering and Terrorism Financing
- Supreme Public Prosecutor's Office
- High Court Podgorica
- General Secretariat of the Government of Montenegro

With a view to establishing concrete cooperation, at the operational level, working team should, at expert-operational level, continue to work and report to the National Commission on the daily implementation of the national policy in the area of prevention and suppression of terrorism, money laundering and terrorism financing.

Also, the Action Plan, as an integral part of this Strategy, was drafted for the period 2015-2016 and in accordance with the situation on the ground is subject to revision and updating.

United Nations Conventions:

- United Nations Convention against Transnational Organized Crime with Protocols thereto ("Official Gazette of FRY" 6/2001) assumed by succession, entered into force on 03/06/2006
- United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances (Vienna Convention), ("Official Gazette of SFRY - International Treaties" 14/90), assumed by succession, entered into force on 03/06/2006
- Convention on Offences and Certain Other Acts Committed on Board Aircraft ("Official Gazette of SFRY - International Treaties" 47/70), assumed by succession, entered into force on 03/06/2006
- International Convention against the Taking of Hostages ("Official Gazette of SFRY - International Treaties" 09/84), assumed by succession, entered into force on 03/06/2006
- Criminal Law Convention on Corruption ("Official Gazette of FRY - International Treaties" 02/02 and "Official Gazette of the Republic of Montenegro" 18/05), assumed by succession, entered into force on 03/06/2006
- International Convention for the Suppression of the Financing of Terrorism ("Official Gazette of FRY" 07/02), assumed by succession, entered into force on 03/06/2006
- International Convention for the Suppression of Terrorist Bombings ("Official Gazette of FRY" 12/02), assumed by succession, entered into force on 03/06/2006
- UN Convention against Corruption ("Official Gazette of Serbia and Montenegro - International Treaties" 11/05), assumed by succession, entered into force on 03/06/2006
- International Convention for the Prevention of Acts of International Terrorism ("Official Gazette of Serbia and Montenegro - International Treaties" 02/06), assumed by succession, entered into force on 03/06/2006
- International Convention for the Suppression of Acts of Nuclear Terrorism ("Official Gazette of Serbia and Montenegro - International Treaties" 2/2006), assumed by succession, entered into force on 03/06/2006
- Protocol for the Suppression of Unlawful Acts of Violence at Airports Serving International Civil Aviation ("Official Gazette of SFRY - International Treaties" 14/89); assumed by succession, entered into force on 03/06/2006
- Protocol against the Illicit Manufacturing of and Trafficking in Firearms, Their Parts and Components and Ammunition, Supplementing the United Nations Convention against Transnational Organized Crime ("Official Gazette of Serbia and Montenegro - International Treaties" 11/05), assumed by succession, entered into force on 03/06/2006

Montenegro ratified

- Additional Protocol to the Criminal Law Convention on Corruption ("Official Gazette of Montenegro" 11/07) Convention on Cluster Munitions ("Official Gazette of Montenegro - International Treaties" 4/09)

Council of Europe Conventions:

- Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data ("Official Gazette of FRY" 01/92), assumed by succession, entered into force on 03/06/2006
- European Convention on Extradition, with Additional Protocols thereto ("Official Gazette of FRY" 10/01), assumed by succession, entered into force on 03/06/2006
- European Convention on the Transfer of Sentenced Persons with Additional Protocol thereto ("Official Gazette of FRY" 04/01), assumed by succession, entered into force on 03/06/2006
- European Convention on the Suppression of Terrorism ("Official Gazette of FRY" 10/01), assumed by succession, entered into force on 03/06/2006
- European Convention on the Transfer of Proceedings in Criminal Matters ("Official Gazette of FRY" 10/01), assumed by succession, entered into force on 03/06/2006
- European Convention on Mutual Assistance in Criminal Matters with Additional Protocol thereto ("Official Gazette of FRY" 10/01 and "Official Gazette of Serbia and Montenegro - International Treaties" 2/06), assumed by succession, entered into force on 03/06/2006
- European Convention on the International Validity of Criminal Judgments with Annexes thereto ("Official Gazette of SFRY - International Treaties" 13/02 and 02/06), assumed by succession, entered into force on 03/06/2006
- Agreement on Cooperation to Prevent and Combat Trans-Border Crime ("Official Gazette of Serbia and Montenegro - International Treaties" 05/03), assumed by succession, entered into force on 03/06/2006

MONTENEGRO
GOVERNMENT OF MONTENEGRO

NATIONAL COMMISSION FOR THE IMPLEMENTATION OF THE STRATEGY FOR PREVENTION AND SUPPRESSION OF TERRORISM,
MONEY LAUNDERING AND TERRORISM FINANCING 2015-2018

ACTION PLAN 2015-2016

Podgorica, March 16, 2015

No.	GOAL	MEASURE	COMPETENT BODY	DEADLINE	PERFORMANCE INDICATOR
I TERRORISM					
1 TERRORISM PREVENTION					
1	Harmonization of national legislation with international legal legacy	1.1. Passed the Law on Amendments to the Criminal Code of Montenegro with the aim of incrimination of foreign fighters	Ministry of Justice, Government of Montenegro, Parliament of Montenegro, General Secretariat of Judicial Council	2015	Passed the Law on Amendments to the Criminal Code of Montenegro in accordance with the UN Resolution on foreign fighters 2178 (2014) Results of the implementation of the law
		1.2. Adoption of the Rulebook on technical requirements and procedures for the assessment of explosive substances harmonization, as well as codes and ways of explosive materials labelling	Ministry of Interior	2015	Rulebook passed Testing of explosives standards, the traceability of explosives (explosives movement)

		1.3. Adoption of the Rulebook on the content of the applications and documentation for issuing opinions and approvals, security clearances and dangers zones limits for all the types of manufacturing and storage facilities, the conditions to be met by the production and storage facilities, location and the method of their physical and technical security	Ministry of Interior	2015	Rulebook passed Defined security requirements to be met by the production and storage facility
		1.4. Establishment of Draft Law on the Nuclear and Radiation Safety and Radiation Protection	Ministry of Sustainable Development and Tourism, Government of Montenegro,	2016	Established Proposal of amendments to the Law and submitted to the Parliament Results of implementation of the Law
		1.5. Establishing the Draft Law on Amendments to the Law on Defence (in the part relating to the field of military intelligence, counter-intelligence and security affairs)	MoD, Government of Montenegro,	2016	Established Proposal of the Law on Amendments to the Law on Defence
		1.6. Passed the Law on Amendments to the Law on the National Security Agency	NSA, Government, Parliament of Montenegro	June 2015	Passed the Law on Amendments to the Law on National Security Agency

2	Developed personnel and material-technical capacities	2.1 Development of new Rulebooks on organization and systematization	MoI-PA MoD, NSA	2015	Rulebooks adopted
		2.2. Recruiting of staff needed	MoI-PA MoD, NSA	Continuously	Staffing in accordance with the systematization
		2.3. Consolidation of official positions within the criminal police dealing with investigations of criminal offences of terrorism and related criminal activities in a single unit	MoI-PA	June 2015	Consolidated positions
		2.4 Procurement of equipment	MoI-PA MoD, NSA and other bodies	Continuously	Plan for necessary equipment made Equipment procured
3	New training programs and specializations	3.1 Organize training for judges and public prosecutors in terms of familiarization with international conventions and laws	Coordination Board, Judicial training Centre	Continuously	Target group defined Defined training plan with international organizations Number of organized trainings and the number of participants
		3.2. Organize training for judiciary positions in terms of legal regulations implementation	Coordination Board, Judicial training Centre	Continuously	Target group defined Defined training plan with international organizations Number of organized training and the number of participants

implemented				
	3.3. Organize training to identify and prevent radicalization and extremism that can potentially grow into terrorism	MoI-PA, MoD, NSA, Police Academy and other bodies	Continuously	Number of organized trainings and the number of participants
	3.4. Realization and participation in various forms of training, at the national and international level, foreign fighters related	MoI-PA, MoD, NSA and other bodies	Continuously	Plan for needed trainings made Number of conducted trainings
	3.5. Staff training in the field of CDP (counter diversion protection)	MoI-PA	2015-2016	Plan for needed trainings made Number of conducted trainings
	3.6. Implementation of criminal police officers trainings, working on investigations of terrorism and the related criminal offences	MoI-PA	Continuously	Target group defined Number of organized trainings and the number of participants
	3.7. Strengthening the capacities of intervention units by intensifying specialized trainings and through cooperation and the exchange of experiences with well known special forces in the region and beyond	MoI-PA, MoD	Continuously	Target group defined Number of organized trainings and the number of participants
	3.8. Participation in joint training with forces of other institutions in	MoD, MoI-PA	Continuously	Target group defined Number of joint trainings and the number of

		Montenegro; NATO forces and other foreign armed forces			participants
		3.9. Implementation of specialized trainings for officers of NSA and MoD (Department for Military Intelligence and Security Affairs), dealing with counter terrorism affairs	NSA, MoD	Continuously	Target group defined Number of organized trainings and the number of participants
		3.10. Implementation of training in the field of protection and elimination of the consequences, fires, explosions and accidents (FEA); Chemical Biological Radiological Nuclear (CBRN) accidents; unexploded ordnance (UXO) and other hazardous substances	MoI-PA, MoD	Continuously	Target group defined Number of organized trainings and the number of participants
4	Intelligence system strengthening	4.1. Signing of Cooperation Agreement between MoI-MoD-NSA for the purposes of the exchange of data, opinions, proposals important for the effective fight against terrorism and related criminal offences	MoD, MoI, NSA	2016	Agreement signed, cooperation mechanisms defined
5	Implementation of the approach based on the respect of the community and the work of the police in order to prevent violent	5.1. Police work oriented toward local community	MoI-PA	Continuously	Local police informed about the measures of recognizing forms of violent radicalization and terrorism

	extremism and radicalization that lead to terrorism				
1 SUPPRESSING TERRORISM					
6	Threat of terrorism assessment	6.1. Development of risk assessment and hazard analysis	Inter-Agency Working Group at operational / expert level	2015	Methodology for collecting data necessary for the risk assessment and risk analysis made Assessment and analysis done
7	Improved mechanisms to monitor the spread of religious radicalism and extremist actions of individuals and groups in Montenegro	7.1. Identifying the groups subject to the influence of violent radicalism and extremism and potential links with foreign fighters	Inter-Agency Working Group at operational / expert level	Continuously	Groups identified
		7.2. Combating illegal crossing of the state border	Mol/PA, NSA	Continuously	Number of detected persons at border crossings Number of detected persons outside border crossings
		7.3. Persons detection by arrest warrants at border crossings using Interpol FIND system	Mol/PA,	Continuously	Number of detected persons by the international and national arrest warrants at border crossings
		7.4. Stamping out CO of illegal possession of weapons and explosive materials	Mol/PA, NSA	Continuously	Number of detected and prosecuted persons/groups

2 PROTECTION AGAINST TERRORISM

8	Improved mechanisms for developing and strengthening the protection of infrastructure facilities of special importance in the territory of Montenegro	8.1. Identification of national critical infrastructure	MoI, MoD, MoE, MIS, MoT	2016	National infrastructure identified Critical infrastructure facilities list prepared
		8.2. Determining needed level of protection of facilities of special importance in the territory of Montenegro	MoI-PA, MoD and other bodies	2016	Needed level of facilities protection established
		8.3. Updating the regulations that define the obligation of facilities protection	MoI, MoD, MIS and other bodies	Continuously	Regulations updated
		8.4. Reconstruction of the MoI warehouse of weapons and mine-explosive devices "ROGAMI"	MoI	Dec 2015	Technical protection measures installed
9	Improved mechanisms for strengthening the system of protection and supervision of the state border	9.1. Improvement of state border surveillance	MoI-PA	Continuously	Estimation of the border vulnerability made
		9.2. Procurement of needed equipment	MoI-PA	Continuously	Equipment procured

10	Improved control system of traffic, transport, warehousing, preservation and maintenance of weapons, explosives and other means that could be used for terrorist attacks, and dual-use goods	10.1. Check of the current control system of traffic, warehousing and preservation of weapons, explosives and other means	MoI, MoD	Continuously	Report in connection with the conducted inspection supervision prepared, Measures to eliminate the identified deficiencies proposed
		10.2. Check the current control system of traffic and dual-use goods	MoI, MoE	Continuously	Report on the conducted inspection supervision prepared and measures to remedy the deficiencies proposed
		10.3. Raising awareness of the inspection services and legal persons in the need of full implementation of legal provisions	MoI, MoD, Administration for Inspection Affairs and other bodies	Continuously	Number of held seminars for inspection services and legal persons on the enforcement of the laws which regulate this area
11	Improving security in land, water and air transport	11.1. Implementation of international regulations and international practice	MoT	Continuously	New practices introduced, Number of controls made, Inter-agency exercises conducted
4 CRIMINAL PROSECUTION					
12	Effective enforcement of the criminal prosecution and prosecution of perpetrators, accomplices and other persons who are in any way linked to terrorist activities	12.1. Cooperation of HPPO and Police	HPPO, MoI-PA	Continuously	Report on the implementation of the Protocol on Cooperation
		12.2. Conducting financial investigations for crimes of terrorism	HPPO, MoI,	Continuously	Number of investigations that have resulted in prosecution

		and the related criminal offences	APMLFT		
5 REMEDIATION OF DAMAGE FROM TERRORIST ATTACKS					
13	Improved and developed national capacities necessary for recovery from the consequences of attacks and revitalization of damaged systems	13.1. Check existing plans through conducting inter-agency exercises in different scenarios and drawing up new plans	Mol and other bodies	Continuously	Existing plans checked Action plans made
14	Developed mechanisms for rescue of people, material and cultural goods and the environment	14.2. Strengthening coordination and cooperation with a view to adequate engaging of protection and rescue service resources	Mol and local SPR	Continuously	Number of joint interventions

II MONEY LAUNDERING AND TERRORISM FINANCING

15	Made risk assessment of money laundering and terrorism financing	15.1. Drafting a national risk assessment	MoF, HPPO, MoI-PA, APMLFT, CBMNE and other bodies	Sep 2015	National risk assessment made
16	Improving the normative-legal framework	16.1. Development of guidelines for risk analysis drafting in order to prevent money laundering and terrorism financing	APMLFT	Dec 2015	Guidelines developed
		16.2. Amendment to the list of indicators for identifying suspicious customers and transactions	MoF, APMLFT	Continuously	Number of completed indicators
17	Developed personnel and material-technical capacities	17.1. Recruiting staff needed	APMLFT	Continuously	Staffing in accordance with the systematization
		17.2. Adoption of APMLFTD organizational development strategy	APMLFT	June 2015	Strategy passed
		17.3. IT equipment procurement	APMLFT	2015-2016	Plan on necessary equipment made Equipment procured

18	Improved institutional cooperation with a view to efficient data exchange	18.1. Evaluation of a need other state bodies to be signatories to the Memorandum on Cooperation and Data Exchange in the field of PMLFT	APMLFT	2015-2016	Assessment made
		18.2. Effective inter-agency data exchange	APMLFT, MoI-PA, HPPO, NSA	Continuously	Number of uploaded information and replies related to cases in which there is a suspicion of money laundering, terrorism financing and other related criminal offences Information on the measures and actions taken based on information obtained from APMLFT
19	Improved international cooperation	19.1. Signing of cooperation agreements with foreign FIS	APMLFT	Continuously	Number of agreements signed with foreign FIS
		19.2. Effective exchange of data, information and documents with the authorities of other countries and international organizations as well	MoJ, MoI, HPPO, APMLFT	Continuously	Number of sent and received requests Number of sent and received replies based on requests
		19.3. Participation in the work of the Egmont Group, EAG and MONEYVAL	HPPO, MoJ, MoI-PA, APMLFT, CBMNE	Continuously	Number of reports on participation in the activities of the Egmont Group, EAG and MONEYVAL

20	Capacity building through the implementation of training and specialization	20.1. Participation in seminars, trainings and professional development, organized by local and international institutions	SC, HPPO, MoI-UP, APMFLT	Continuously	Number of conducted trainings and the number of participants
		20.2. Conducting trainings for supervisory bodies	Supervisory authorities referred to in Article 94 of the Law on PMLFT	Continuously	Number of conducted trainings and the number of participants
		20.3. Organization of seminars and counselling for authorized persons of obligated parties and employees who have direct contact with clients	APMLFT and MoI-PA, in cooperation with competent authorities	Continuously	Number of conducted trainings and the number of participants
21	Implemented recommendations of MONEYVAL	21.1. Work according to the recommendations	MoJ, HPPO, MoI-PA APMFLT, CBMNE	Continuously	Report on the activities undertaken in accordance with the recommendations of MONEYVAL
22	Strengthening the supervision of obligated parties of the Law on PMLFT	22.1. Carrying out the control over obligated parties in terms of the enforcement of the Law on PMLFT	Supervisory authorities referred to in Article 94 of the Law on PMLFT, Misdemeanour Council	Continuously	Number of controls carried out, misdemeanour charges filed and sentences imposed

