



BASIC ML/TF

**Lido di Ostia
May 2025**



- THE GUARDIA DI FINANZA IS A **MILITARY POLICE FORCE** REPORTING DIRECTLY TO THE **MINISTER OF ECONOMY AND FINANCE**, WITH **GENERAL COMPETENCE IN FIGHTING ECONOMIC AND FINANCIAL CRIME**.
- THE GUARDIA DI FINANZA HAS THE EXCLUSIVE FUNCTION OF ECONOMIC AND FINANCIAL **POLICE AT SEA**, GIVING ITS SUPPORT IN MAINTAINING **PUBLIC ORDER** AND **SECURITY** AND COMBATING ILLEGAL TRAFFICKING.

COMBATING
TAX AND
CUSTOM
FRAUDS

FIGHT AGAINST
PUBLIC
EXPENDITURE
OFFENCES

COMBATING
ECONOMIC AND
FINANCIAL
CRIME

CONTRIBUTION
TO THE
INTERNAL
SECURITY

Guardia di Finanza (GdF): role, mission and vision

Our “*strategic mission*”

The **primary goal of fighting against tax evasion and avoidance** has progressively widened its scope towards ***all economic and financial misconducts and illegal activities***

the Corps as per the indications of the **Government Authority** is daily committed to tackle

1° STRATEGIC TARGET

*tax evasion, dodging
and frauds*

2° STRATEGIC TARGET

*offences and crimes related
to the public expenditure*

3° STRATEGIC TARGET

*economic and financial
unlawful deeds in
general*

CROSS-SECTORAL APPROACH

Guardia di Finanza (GdF): role, mission and vision

GdF – in the Italian landscape – has a *peculiar nature*, since it is at the same time

a National Tax Administration (NTA), in collaboration with the main *Italian fiscal agencies*, such as **Revenue Tax Authority (Agenzia delle Entrate)** and **Custom Tax Authority (Agenzia delle Dogane e dei Monopoli)**

a Law Enforcement Agency (LEA), along with **Arma dei Carabinieri** and **Polizia di Stato**, which are both *police bodies with general competencies in criminal matters*. All these actors are involved in a daily **information exchange**, via shared data warehouse, by virtue of **Law nr. 121/1981**.



AGENZIA
DOGANE
MONOPOLI



The distribution of competencies amongst the three Italian Police Forces is set by an **Interior Minister's Decree dated 15 august 2017**, which assigns to GdF, inter alia,:

a *principal role* in combating **European frauds**, including the protection of **EU financial interests** related to *agriculture* and *fisheries*

an *exclusive role* in tackling **financial and custom frauds** against the **EU budget**

THE ROLE OF THE CORPS IN COMBATING ECONOMIC AND FINANCIAL OFFENSES

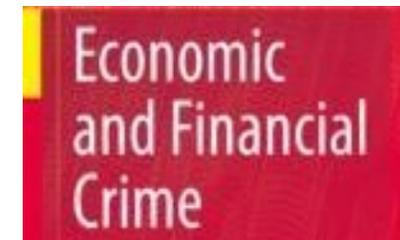


Tax audits targeting economic entities characterized by tangible signs of 'fiscal dangerousness'



SPECIAL CURRENCY
POLICE

Administrative prevention from the use of the financial system for money laundering purposes



PROCURA
DELLA
REPUBBLICA



EUROPEAN
PUBLIC
PROSECUTOR'S
OFFICE

Criminal police investigations assigned to the Corps' Units by the National Public Prosecutor's Office/EPPO

PERSONNEL STRENGTH

Officers	3.325
Warrant Officers	26.747
Sergeants	10.112
Agents	23.894
TOTAL	64.078



AIR AND NAVAL FLEET

Air Assets	56
Naval Assets	394
S.A.P.R.	98
TOTAL	548



GENERAL HEADQUARTERS

- CENTRAL BODY IN CHARGE OF TOP
MANAGEMENT

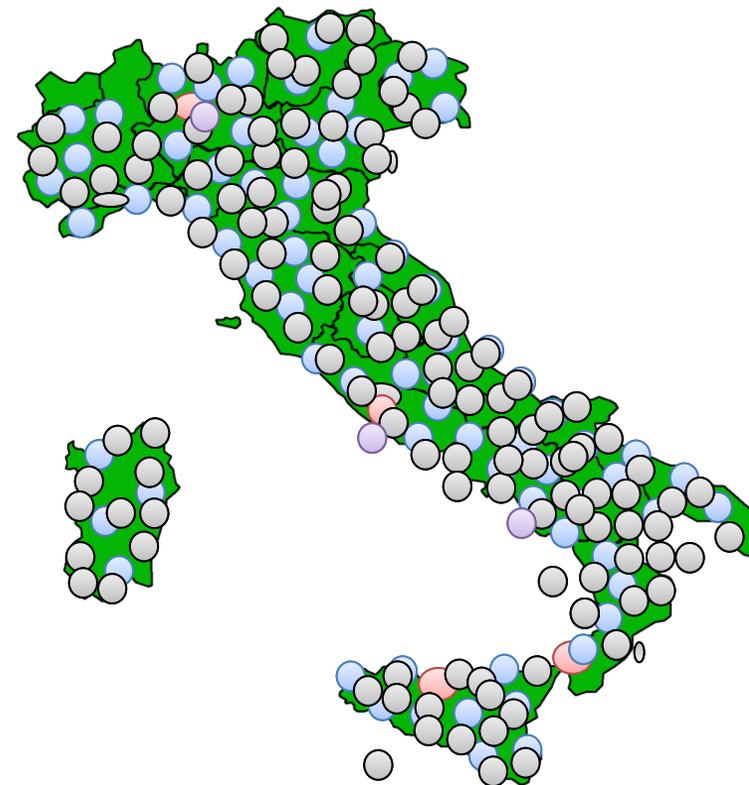


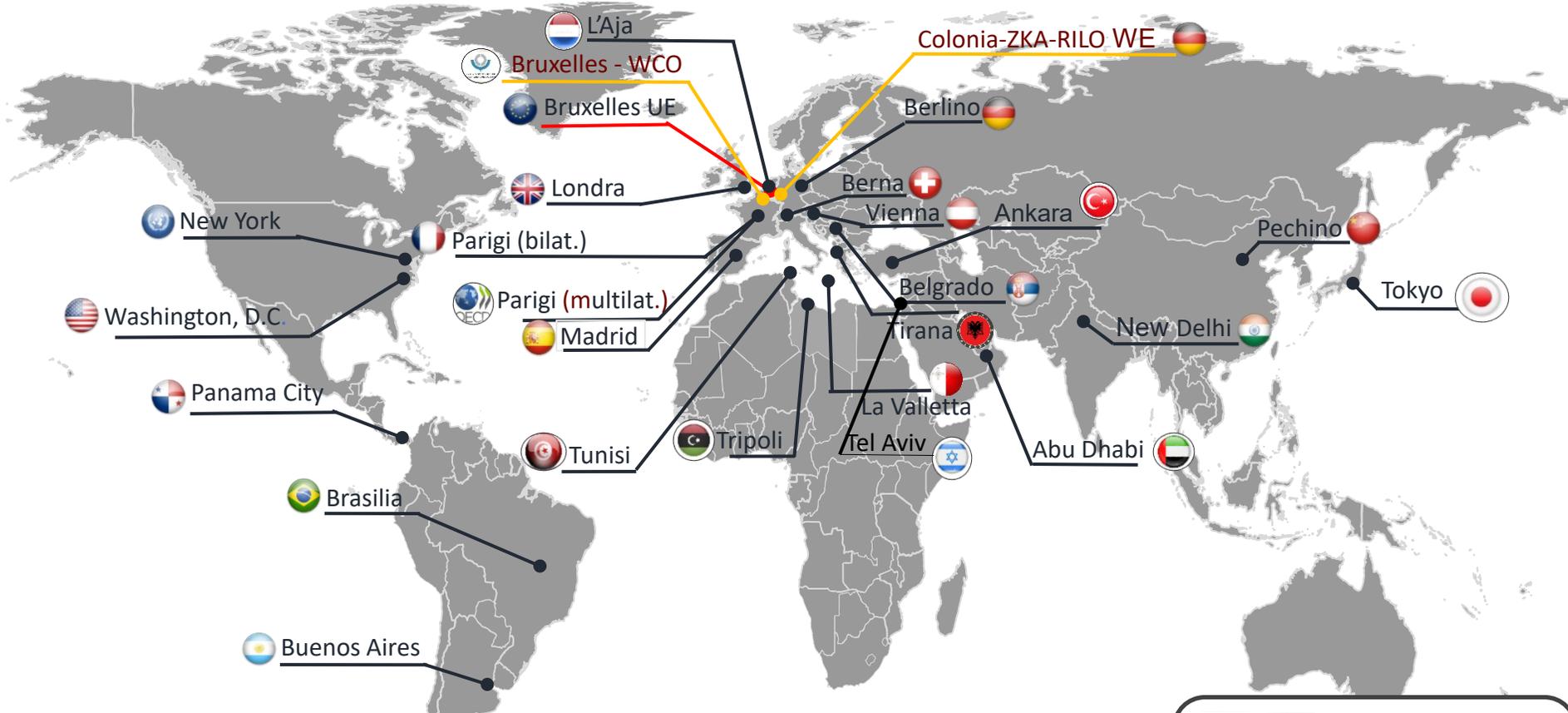
SPECIAL UNITS

- Currency Police Special Unit
- Revenues
- Public Spending and EU Frauds Repression
- Anti-Corruption
- Antitrust
- Technological Frauds and Privacy Protection
- Goods and Services
- Parliamentary Enquiries Commissions

MORE THAN 500 TERRITORIAL UNITS

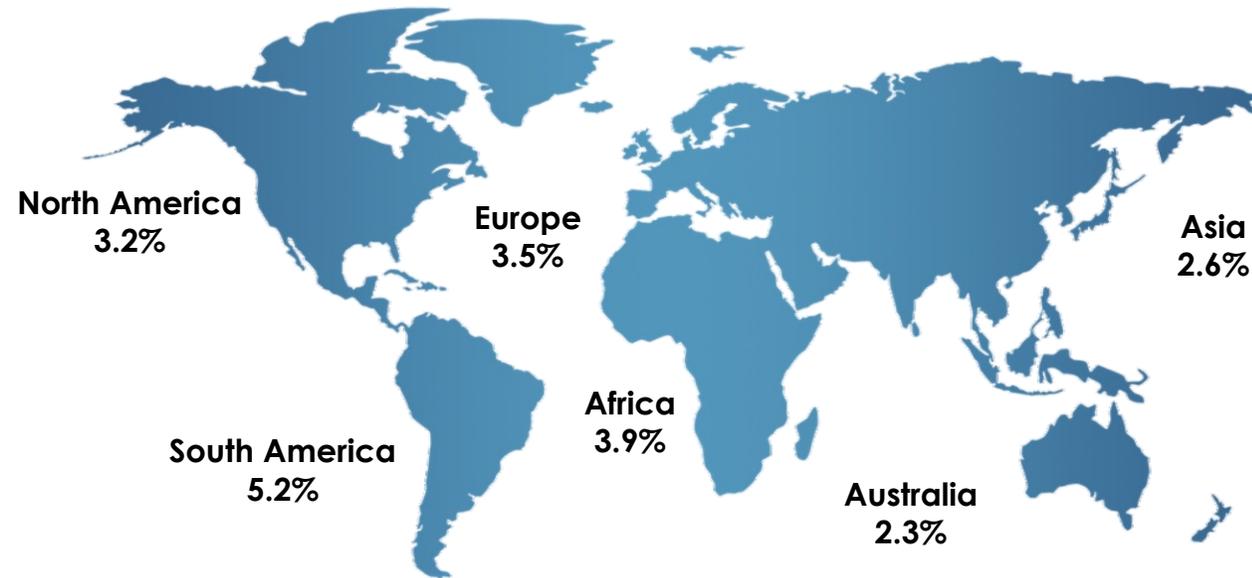
- **Local units**
- **Border control units**
- **Air and Naval departments**





- 25** at diplomatic missions
- 2** Liasons Officers: Bruxelles (OMD) e Colonia (ZKA-RILO WE)
- 1** Supporting Officer: Bruxelles (Rapp. UE)

	Experts
	Liasons Officers
	Supporting Officer



According to the latest estimates, the money laundering value in the world is between 2% and 5% of GDP: approximately \$800 billion to \$2 trillion

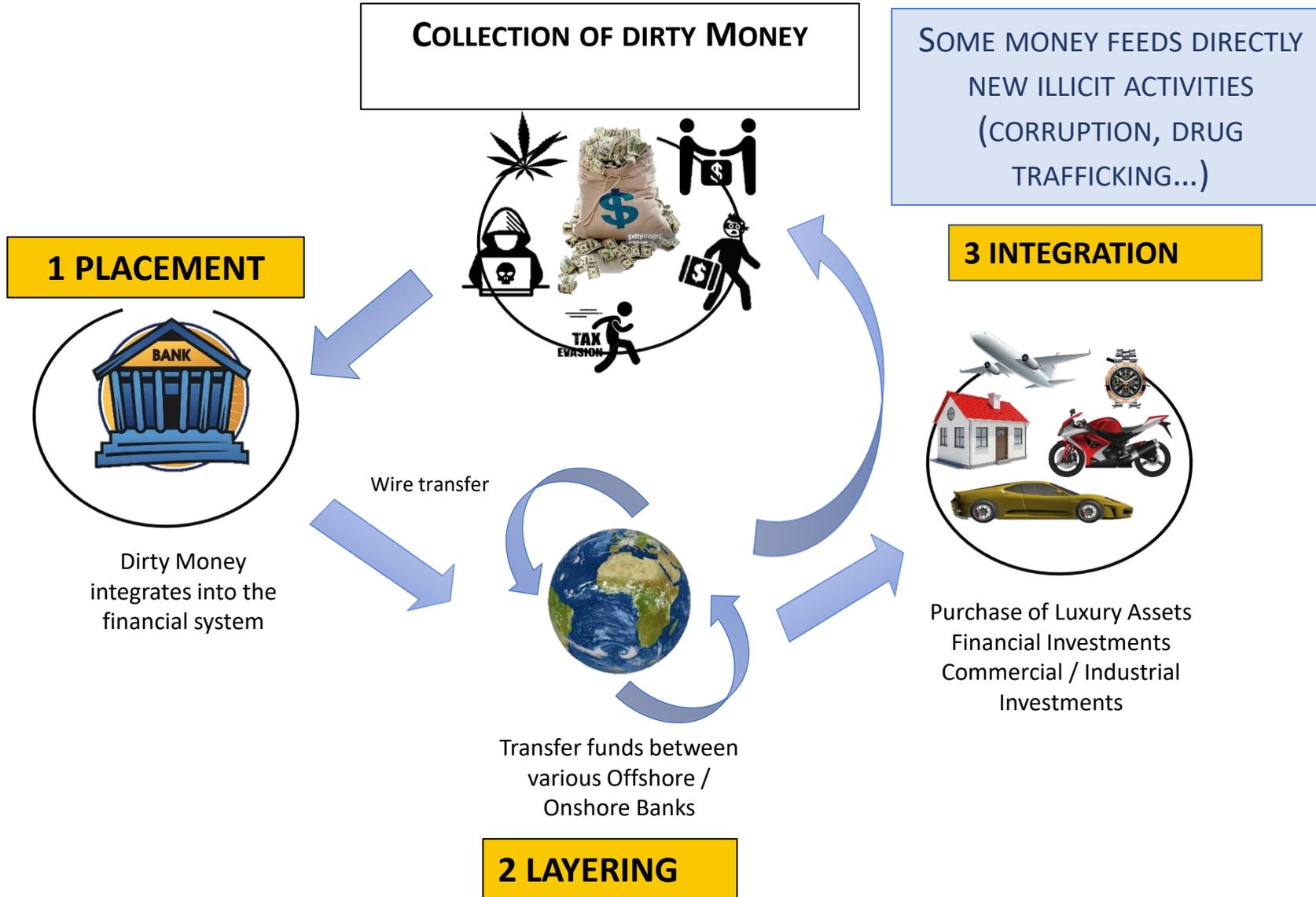
United Nations Office on Drugs and Crime - 2022

WHY?

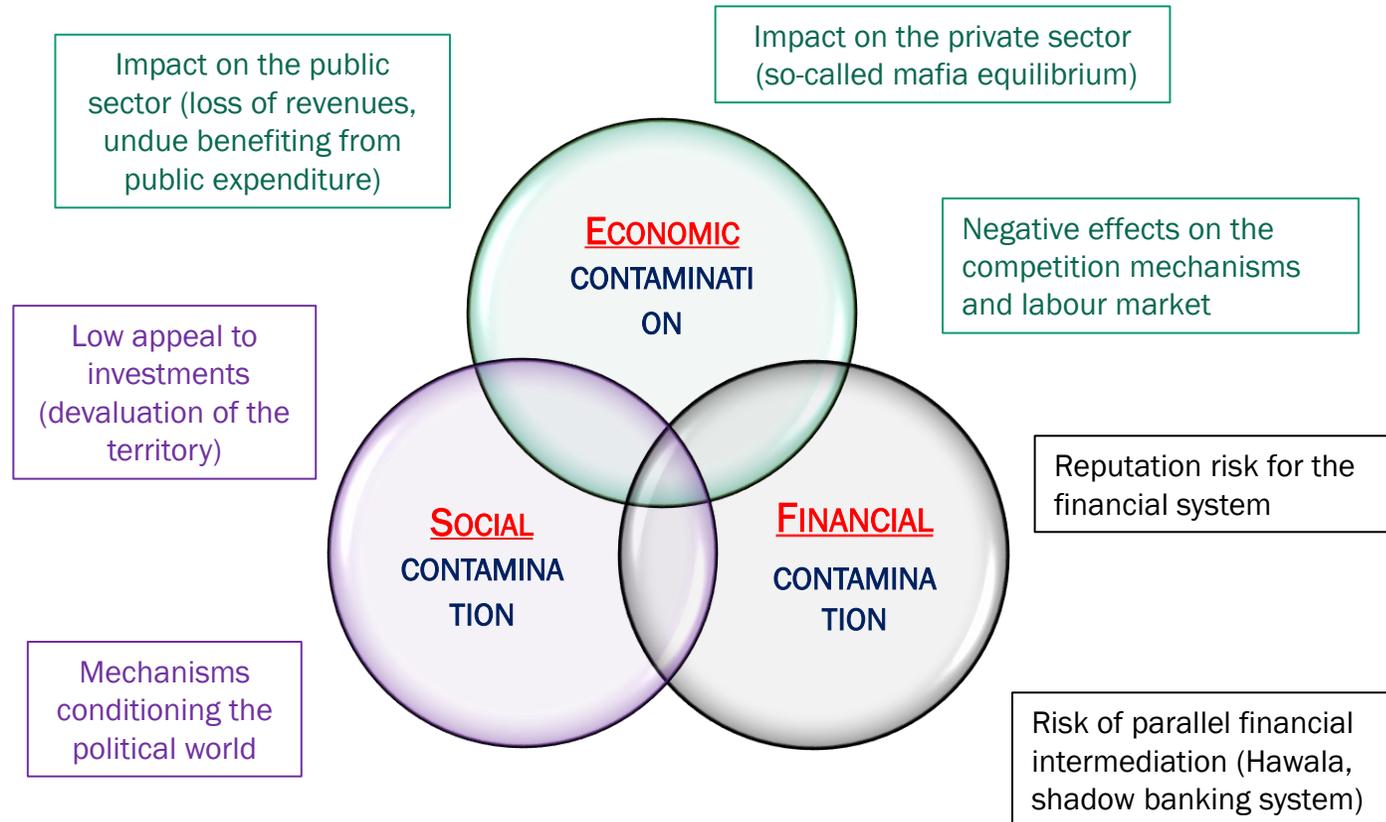


Massive amounts of money have to be recycled in order TO BE SPENT

THE CONCEPT OF MONEY LAUNDERING



THE THREATS OF MONEY LAUNDERING



Global Economic and Financial Security is essential for Prosperity

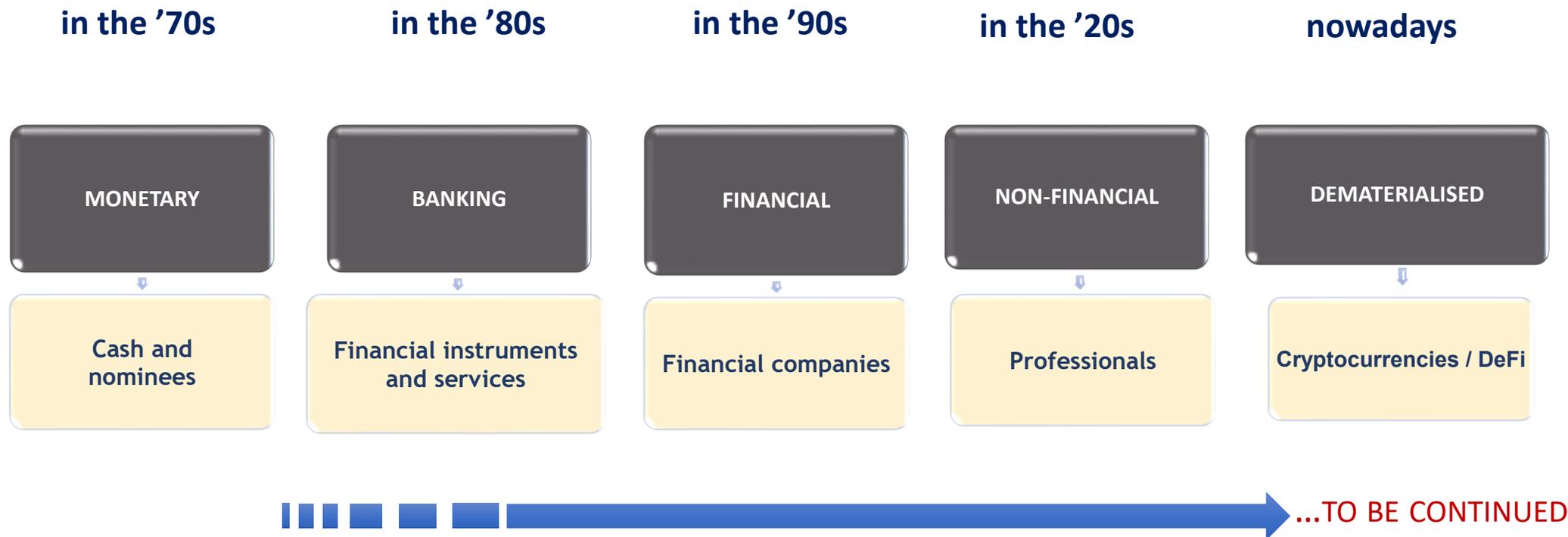
Security challenges are more interconnected and complex



Emerging Threats

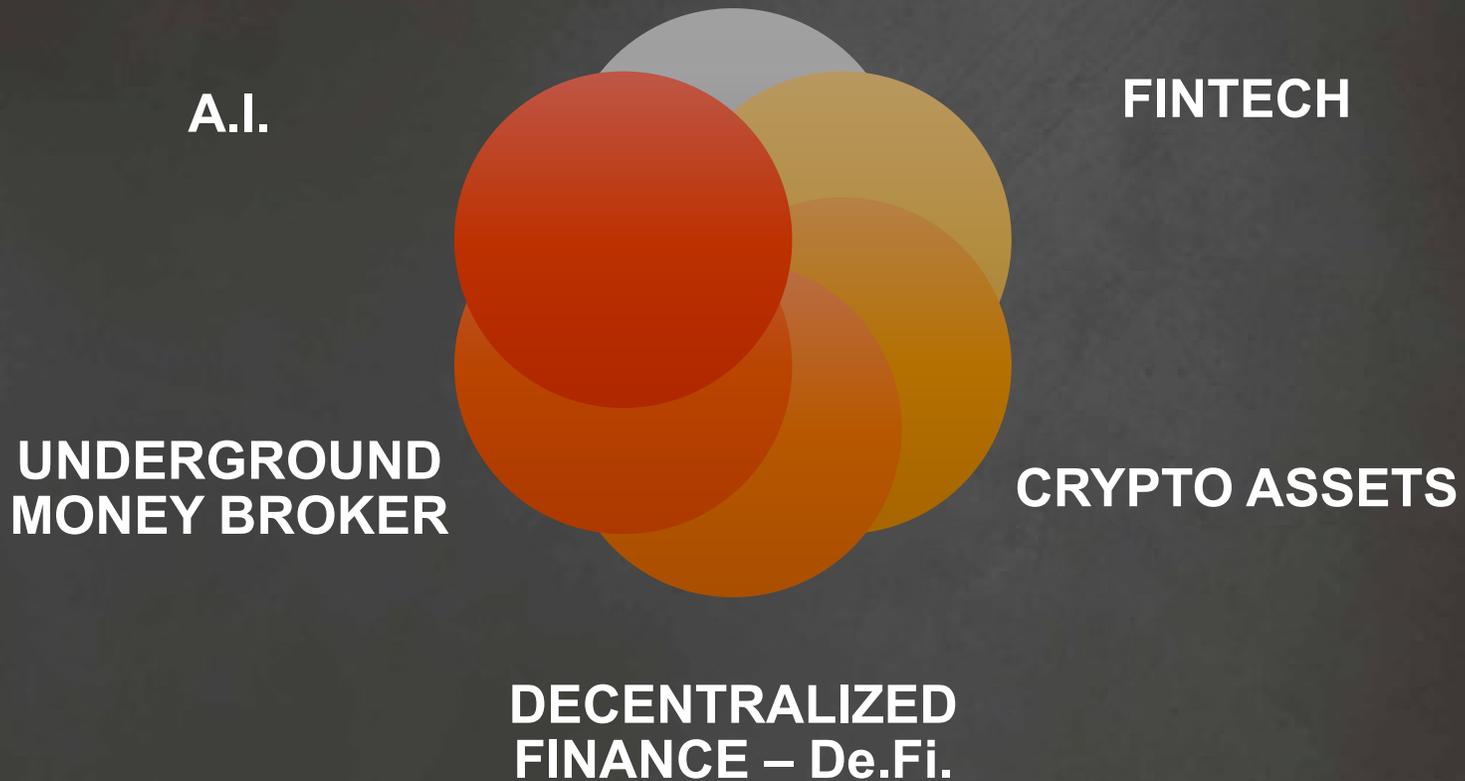
Sophisticated illicit financial activities

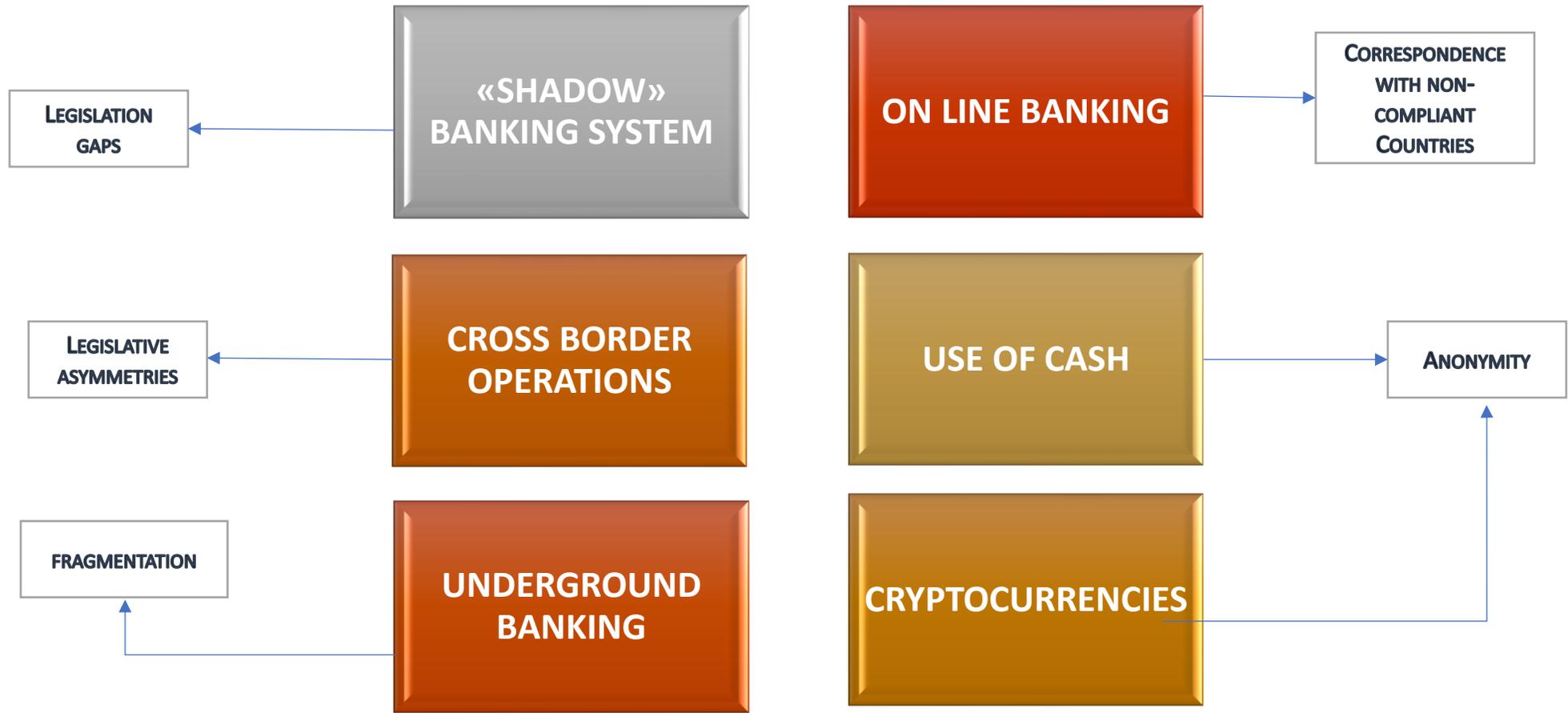
...from simple methods to the most complex ones...



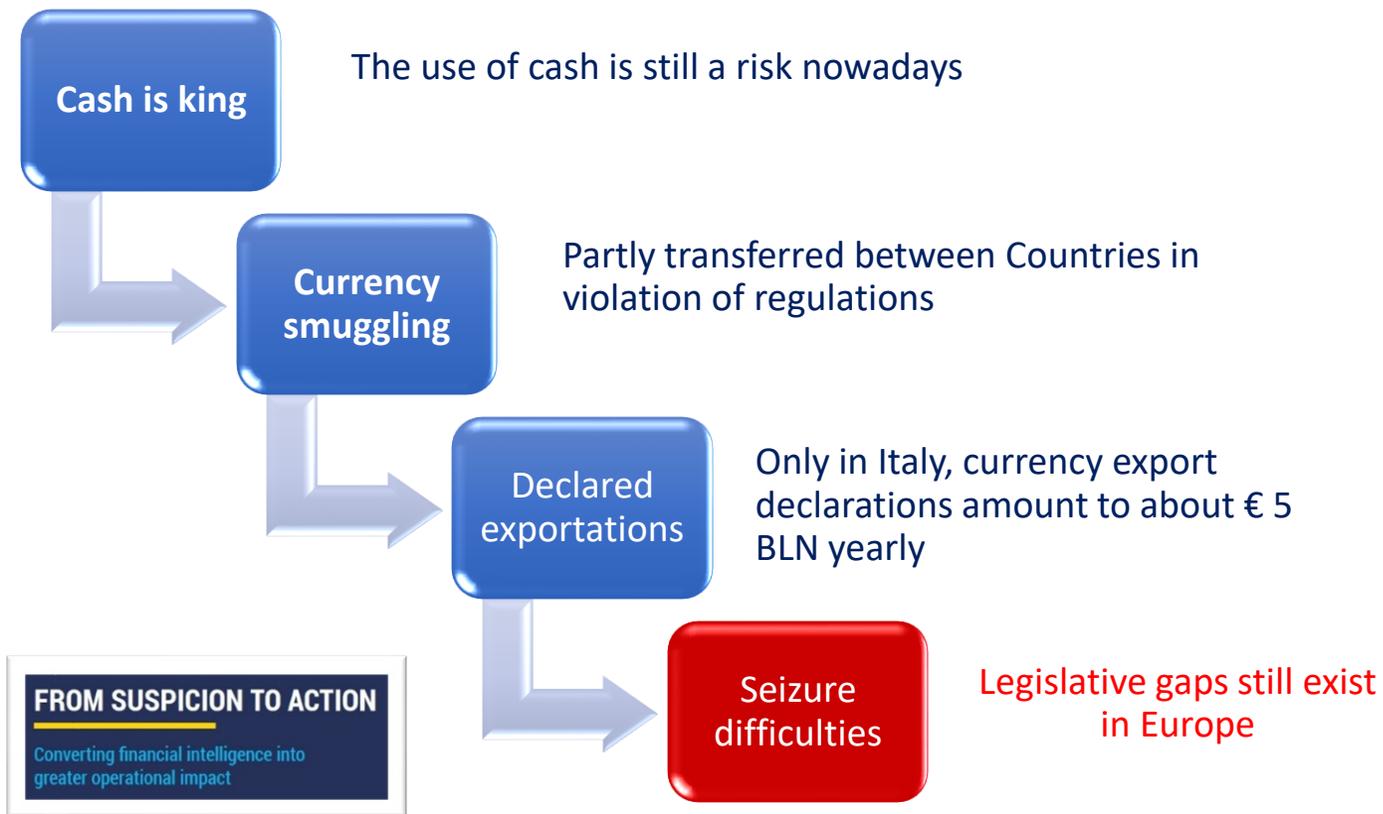
GLOBAL SCENARIO

DIGITAL ECONOMY





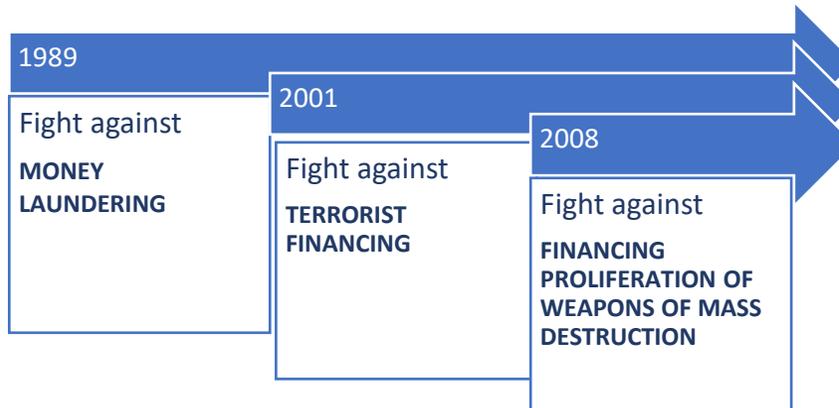
CASH IS KING





Financial Action Task Force

Established in **1989** by the **G7** as a temporary *task force*, it is now an **independent and permanent inter-governmental body**, within the **OECD**



The **GAFI - FATF Recommendations** are recognised as **international standards**



This map is without prejudice to the status of or sovereignty over any territory, to the delimitation of international frontiers and boundaries and to the name of any territory, city or area.

<https://www.fatf-gafi.org/en/countries.html>

1990

1996

2001

2003

2012

40 + 9 Recommendations issued in cooperation with the **Regional Groups**,
set-up according to the **GAFI-FATF** model.
Recommendations are updated by FATF when necessary.



OBSERVERS

40 Racc. FATF

- **AML/CFT POLICIES AND COORDINATION (R1-R2)**
- **MONEY LAUNDERING AND CONFISCATION (R3-R4)**
- **TERRORIST FINANCING AND FINANCING OF PROLIFERATION (R5-R8)**
- **PREVENTIVE MEASURES (R9-R23)**
- **TRANSPARENCY AND BENEFICIAL OWNERSHIP OF LEGAL PERSONS AND ARRANGEMENTS (R24-R25)**
- **POWERS AND RESPONSIBILITIES OF COMPETENT AUTHORITIES AND OTHER INSTITUTIONAL MEASURES (R26-R35)**
- **INTERNATIONAL COOPERATION (R36-R40)**

THE RISK ASSESSMENT

TECHNICAL COMPLIANCE.

Ratings which reflect the extent to which a country has implemented the technical requirements of the FATF Recommendations.



EFFECTIVENESS.

Ratings that reflect the extent to which a country's measures are effective. The assessment is conducted on the basis of 11 immediate outcomes, which represent key goals that an effective AML/CFT system should achieve.

C	Compliant
LC	Largely compliant - There are only minor shortcomings.
PC	Partially compliant - There are moderate shortcomings.
NC	Non-compliant - There are major shortcomings.
NA	Not applicable - A requirement does not apply, due to the structural, legal or institutional features of the country.

 **FATF Grey List**

Jurisdictions under
Increased Monitoring
as of 21st February 2025

 **Grey List**

- | | | |
|--|--|--|
|  Algeria |  Haiti |  Nepal |
|  Angola |  Kenya |  Nigeria |
|  Bulgaria |  Laos |  South Africa |
|  Burkina Faso |  Lebanon |  South Sudan |
|  Cameroon |  Mali |  Syria |
|  Côte d'Ivoire |  Monaco |  Tanzania |
|  Croatia |  Mozambique |  Venezuela |
|  Democratic Republic of the Congo |  Namibia |  Vietnam |
| | |  Yemen |

 **Added Countries**

-  Laos
-  Nepal

 **Removed Countries**

-  Philippines



The Egmont Group is a united body of 177 Financial Intelligence Units (FIUs): FIUs are uniquely positioned to support national and international efforts to counter-terrorist financing. FIUs are also trusted gateways for sharing financial information domestically and internationally per global anti-money laundering and counter-financing of terrorism (AML/CFT) standards. The Egmont Group provides FIUs with a platform to securely exchange expertise and financial intelligence to combat money laundering, terrorist financing (ML/TF), and associated predicate offences.

Adding value: The Egmont Group adds value to member FIUs' work by improving stakeholders' understanding of ML/TF risks and draws upon operational experience to inform policy considerations, including AML/CFT implementation and AML/CFT reforms. The Egmont Group is the operational arm of the international AML/CFT apparatus.

Financial Intelligence Sharing and International Cooperation: The Egmont Group recognizes financial intelligence sharing is of paramount importance and has become the cornerstone of international efforts to counter ML/TF. FIUs around the world are obliged by international AML/CFT standards to exchange information and engage in international cooperation. As a global financial intelligence forum, the Egmont Group facilitates and prompts this exchange amongst its member FIUs.

International Standards Implementation: The Egmont Group supports international partners' and other stakeholders' efforts to implement the resolutions and statements of the United Nations Security Council, Financial Action Task Force (FATF), and G20 Finance Ministers.

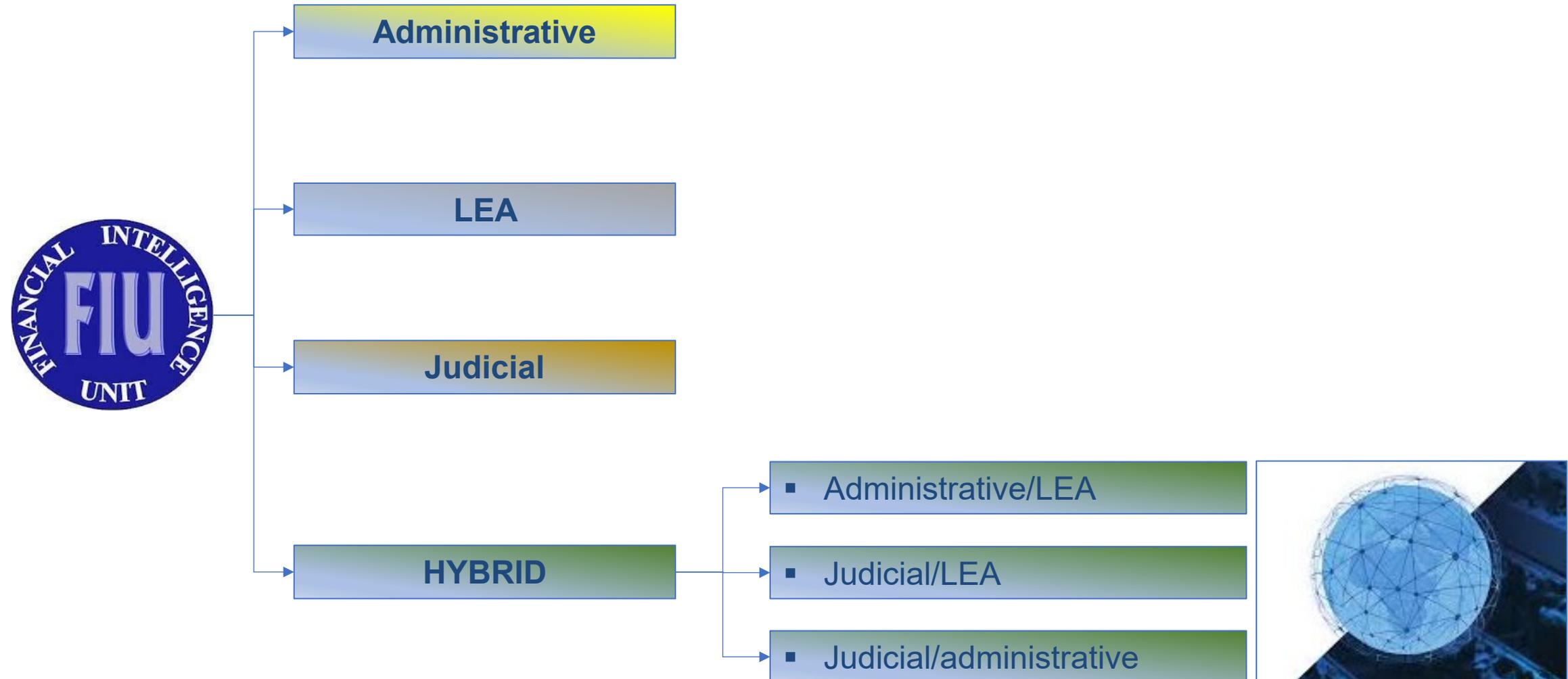
The Egmont Group does not conduct financial investigations. Instead, domestic law enforcement and investigative authorities manage such inquiries.

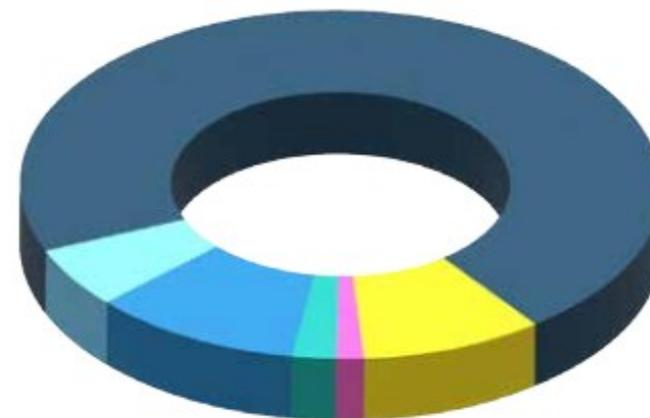
Financial Intelligence Units (FIUs) serve as national centres for the receipt and analysis of suspicious transaction reports and relevant money laundering information, associated predicate offences, and terrorist financing. FIUs are also responsible for disseminating analysis results.

An FIU should obtain additional information from reporting entities and have timely access to required financial, administrative, and law enforcement information to undertake its functions properly. A few major considerations shape an FIU's creation: anti-money laundering and counter-terrorism financing laws, existing law enforcement, and the need for an authority that will receive, assess, and share financial information.

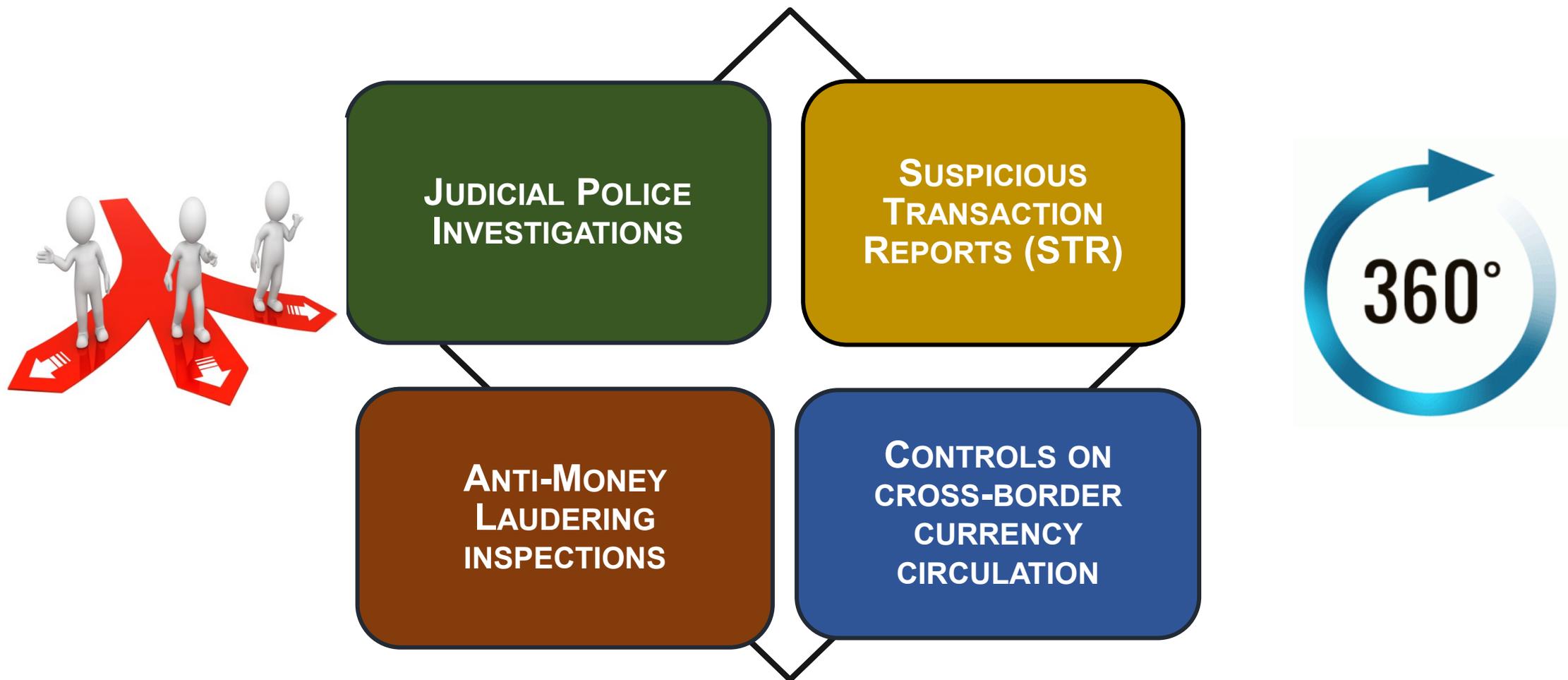


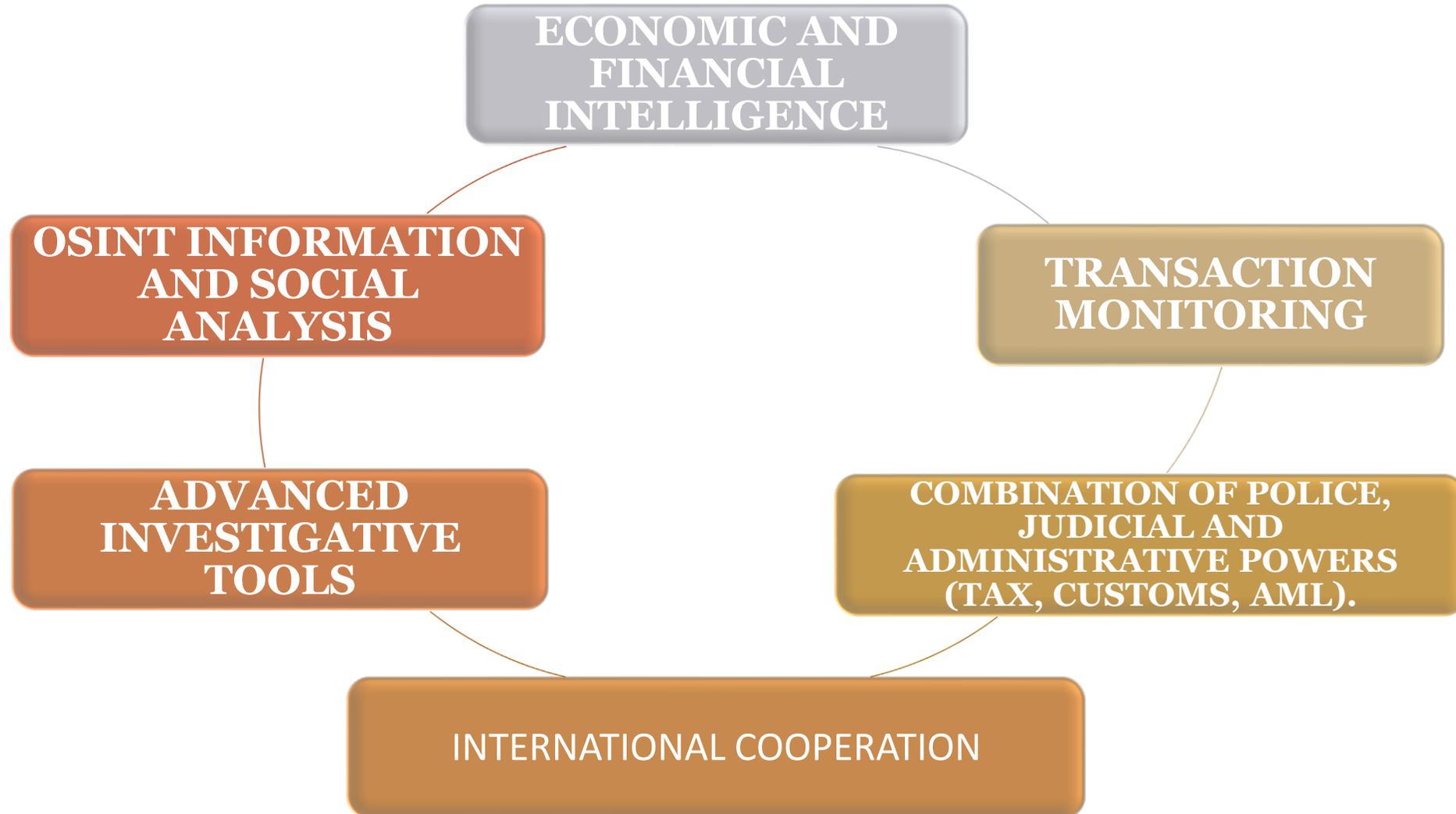
- 29.7 The FIU should be operationally independent and autonomous, by:
- (a) having the authority and capacity to carry out its functions freely, including the autonomous decision to analyse, request and/or forward or disseminate specific information;
 - (b) being able to make arrangements or engage independently with other domestic competent authorities or foreign counterparts on the exchange of information;
 - (c) when it is located within the existing structure of another authority, having distinct core functions from those of the other authority; and
 - (d) being able to obtain and deploy the resources needed to carry out its functions, on an individual or routine basis, free from any undue political, government or industry influence or interference, which might compromise its operational independence.





Lines of action of the corps



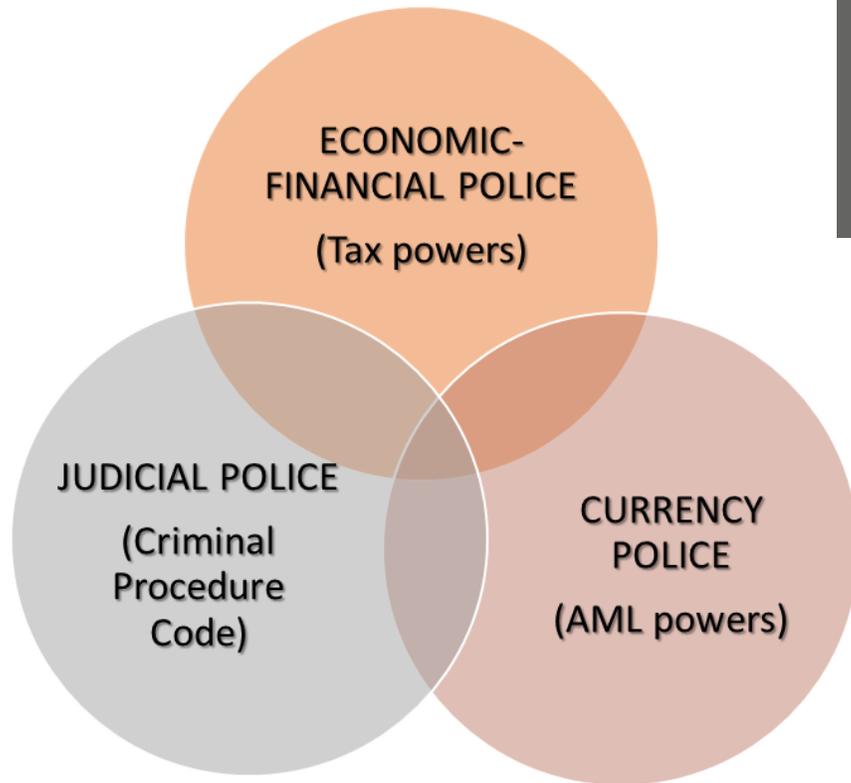


ECONOMIC AND FINANCIAL INTELLIGENCE



**OPERATIONAL TARGET
SELECTION**

**DISCOVER NEW ILLEGAL
TRENDS AND MODUS
OPERANDI**



ADMINISTRATIVE APPROACH

- TAX/CUSTOM **AUDITS**
- INVESTIGATIVE ANALYSIS OF **STRs**
- **INSPECTIONS** OF NATIONAL AML OBLIGED PARTIES (G DI F IS THE SUPERVISORY AUTHORITY FOR DNFBPs)
- **CROSS-BORDER CASH MOVEMENTS** CONTROLS



INTERNATIONAL COOPERATION



1. Interpol
2. Europol
3. Sirene
- D.C.S.A. (CENTRAL ANTI-DRUGS DEPARTMENT)

Through the
Ministry of the
Interior - SCIP



1. Bilateral Agreements and Multilateral Conventions
2. Reg. EC 515/97 (Customs and Agriculture)
3. Reg. EU 389/2012 (Excise)
4. European "Napoles II" Convention



1. Bilateral Agreements and Art. 26 OECD Model Conventions
2. Dir. EU 2011/16 – Leg. Decree 29/2014
3. OECD – Council of Europe Multilateral Convention
4. Reg. EU 904/10 in VAT matters



Network of the
Financial
Intelligence
Units:
1. World (Egmont)
2. European (FIU.NET)



1. Memorandum of Understanding
2. Specific agreements in sectors of institutional interest

TRANSACTION MONITORING



FINANCIAL ANALYSIS



CRIMINAL ANALYSIS

500 LOCAL UNITS

PROSECUTORS

IN-DEPTH CRIMINAL ANALYSIS

OTHER LEAs



MATCHING WITH NATIONAL
ANTITERRORISM PROSECUTOR

STRS ANALYSIS

Risk assessment of reported operations → attributed by the reporting party

Synthetic judgment on the reported operations, left to the autonomous appreciation of the reporting party.

It can assume the values: **Low - Medium Low - Medium - Medium High - High**

Risk profile → attributed by the FIU

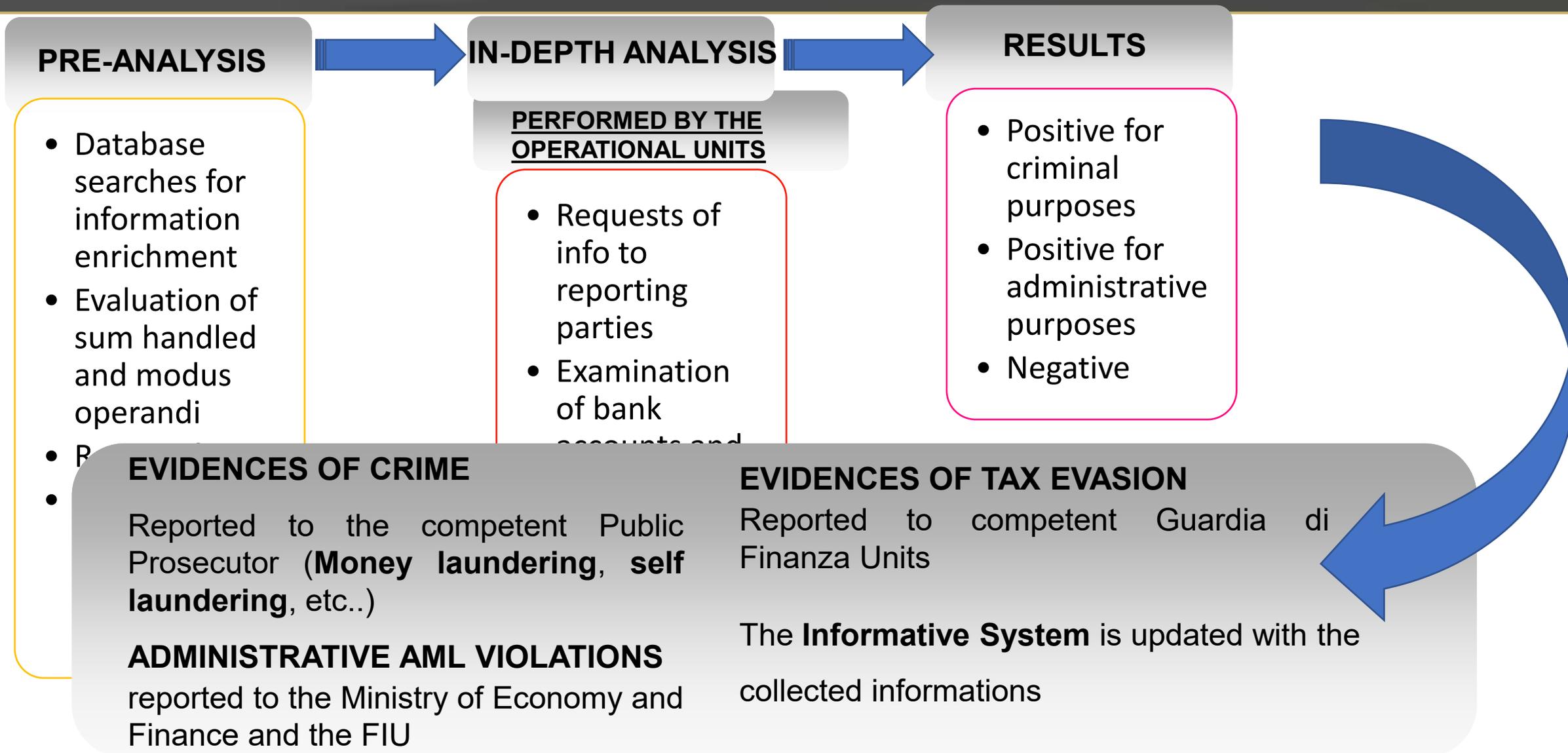
Indicates the level of money laundering or terrorist financing risk of the subject, calculated during the due diligence on the basis of internal assessment systems.

It can assume a numerical value from 0 to 5, **Low (0) - Medium Low (1-2) - Medium (3) - Medium High (4) - High (5)**

PUNCTUAL ANALYSIS OF EVERY STR

CLASSIFICATION OF STRS IN 7 RISK CLASSES:

- **D1:** clear elements of a crime to be reported without delay
- **D2:** judicial interest (connections with ongoing criminal cases or upon request) to be reported as soon as possible
- **D3:** high risk profiles that need to be investigated in 6 months/1 year
- **T1:** indication of a terrorism financing related crime
- **T2:** judicial interest for terrorism financing
- **T3:** high risk profiles for terrorism
- **A.F.I.:** interest for institutional purposes/intelligence asset



Guardia di Finanza's inspection powers

Art. 9

**Access to
Financial
accounts
archive and
Public
Business
Record (BO)**

**Powers of
D.P.R.
148/1988**
(like FIU:
inspection,
submission
of
documents,
interviews,
etc.)

Artt. 40² e 38⁶

Asking to
reporting
parties
**further
information**
to investigate
the STR

Art. 13²

**Info-
investigative
exchange**
with similar
foreign and
international
bodies

**Art. 2² D.Lgs.
68/2001**

**Economic-
Financial Police
functions:**
powers of access,
inspection and
verification D.P.R.
600/1973 and
D.P.R. 633/1972

In case of a crime: **Judicial Police Powers**

Main AML obligations

