



**SAMOA FINANCIAL INTELLIGENCE UNIT
ANNUAL REPORT JULY 2024 – JUNE 2025**

OUR VISION

Samoa to be the leading Pacific Island Nation in the most practical application of international standards on Anti-Money Laundering ('AML') and Countering Terrorist Financing ('CFT').

OUR MISSION

To effectively detect, deter, disrupt, and prevent money laundering and terrorist financing in Samoa in collaboration with the pertinent national agencies, private sector, and international counterparts. This trail will blaze toward a stable and safe financial, social, economic, and political environment.

An effective AML/CFT system requires appropriate laws, sufficiently motivated authorities that are well resourced and informed, and an engaged private sector. AML/CFT is no more effective in reducing the harm caused by crime than any other law if the law is not enforced.

OUR KEY STRATEGIC GOALS

- (1) Strengthen AML/CFT capacity in view of risks and vulnerabilities of Samoa's financial sector.
- (2) Improve Samoa's compliance against the Financial Action Task Force (FATF) internationally recognized 40 AML/CFT standards.
- (3) Improve information and intelligence network.
- (4) Increase engagement with Financial Institutions (FIs) and Designated Non-Financial Business and Professions (DNFBPs) to promote a better understanding of the AML/CFT obligations and ML/TF risks and trends facing Samoa.
- (5) Strengthen working relations and cooperation with law enforcement and supervisory agencies both domestically and internationally in terms of information sharing for the detection and prevention of ML/TF activities.

TABLE OF CONTENTS

GOVERNOR'S FOREWORD	4
1. BACKGROUND	9
1.1 Financial Action Task Force (FATF)	9
1.2 ASIA PACIFIC GROUP (APG) ON MONEY LAUNDERING	10
1.3 FINANCIAL INTELLIGENCE UNIT (FIU)	10
2. OUR MANDATE	10
3. REVIEW OF OPERATIONS IN 2024 - 2025	13
3.1 THE APG AND THE AUTHORITY ACTIVITIES – IMPLEMENTING AML/CFT GLOBAL STANDARDS.	13
3.2 SAMOA NATIONAL RISK ASSESSMENT AND NATIONAL STRATEGY	13
3.3 CONFISCATED ASSETS FUND (CAF)	13
3.4 QUARTERLY MEETINGS	13
4. FIU CORE ACTIVITIES	14
4.1 INTELLIGENCE	14
4.1.1 SUSPICIOUS TRANSACTION REPORTS (STRs)	14
4.1.2 CASH TRANSACTION REPORT (CTRs)	15
4.1.3 BORDER CASH REPORT (BCRs)	15
4.1.4 APPROVAL OF CURRENCY REPATRIATION	15
4.1.5 SAMOA FIU ENQUIRES WITH FINANCIAL INSTITUTIONS	16
4.1.6 INVESTIGATIVE ASSISTANCE PROVIDED TO LAW ENFORCEMENT AGENCIES (LEAS)	16
4.1.7 DISSEMINATION OF INTELLIGENCE ASSESSMENT REPORTS	16
4.1.8 DUE DILIGENCE AND BACKGROUND CHECKS	16
4.2 SUPERVISION	17
4.2.1 ONSITE INSPECTIONS	17
5. CO-OPERATION, COLLABORATION AND INFORMATION SHARING	17
5.1 ASIA PACIFIC GROUP (APG)	17
5.2 PACIFIC FINANCIAL INTELLIGENCE COMMUNITY	18
5.3 EGMONT	18
6. CAPACITY BUILDING	19
6.1 AML/CFT INTERNATIONAL DONORS AND TECHNICAL ASSISTANCE PROVIDERS	19
6.2 ONGOING AWARENESS AND TRAININGS	19
6.2.1 TRAININGS AND WORKSHOPS, FIU STAFF HAS PARTICIPATED FOR THE PERIOD UNDER REVIEW.	19
7. Systems	20
7.1 Taipan System	20
8. LIST OF ACRONYMS	20

GOVERNOR'S FOREWORD



It is my great pleasure as the Governor and Head of the Money Laundering Prevention Authority to introduce the 2024-2025 Annual report for the Samoa Financial Intelligence Unit (FIU).

The FIU was established under the Money Laundering Prevention Act 2007 (MLP Act) to implement international standards for Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT), specifically those set by the Financial Action Task Force (FATF). It currently operates as a department within the Central Bank of Samoa.

This report summarizes the FIU's activities and accomplishments, along with its mandate, duties, and responsibilities. During the reporting period, the FIU made significant progress in implementing AML/CFT standards.

During this financial year, the FIU prepared to undertake a full AML/CFT onsite inspections of Samoa's 12 Money Transfer Operators and 1 Local Investment firm. These onsite inspections are to commence second half of 2025. Further, the FIU also commenced preparation for its onsite inspections for Samoa's four (4)

commercial banks due to begin in early 2026.

The FIU continues to review and analyze Suspicious Transaction Reports (STRs) submitted by financial institutions. When necessary, these reports are disseminated with relevant law enforcement agencies. STRs help the FIU stay informed about potentially illicit financial activities occurring within Samoa's financial system.

Samoa's National Risk Assessment and National Strategy on Money Laundering and Terrorist Financing 2024 – 2026 was approved in 2024. The public version for the National Risk Assessment is now available on the Central Bank of Samoa website.

These documents set the strategic priorities and objectives for the next three years, and serve as a foundational framework to guide Samoa's preparation for the upcoming Mutual Evaluation in 2027.

Furthermore, the International Monetary Fund (IMF) has provided support to the FIU to revise Samoa's money laundering legislation and develop a Risk-Based Supervision tool for banks. These initiatives aim to align Samoa's regulatory framework with the FATF standards and prepare for the 2027 mutual evaluation on AML/CFT.

In July 2024, the FIU also participated in a Multilateral Intelligence Project (MIP), collaborating with regional FIUs to strengthen intelligence sharing and operational capabilities. This participation underscores Samoa's

commitment to regional cooperation in combating transnational financial crime. The FIU continues to engage with regional and international partners, sharing information and participating in training programs to enhance its capacity to combat money laundering. Strong collaboration between financial institutions and national agencies remains essential to reinforcing Samoa's AML/CFT framework.

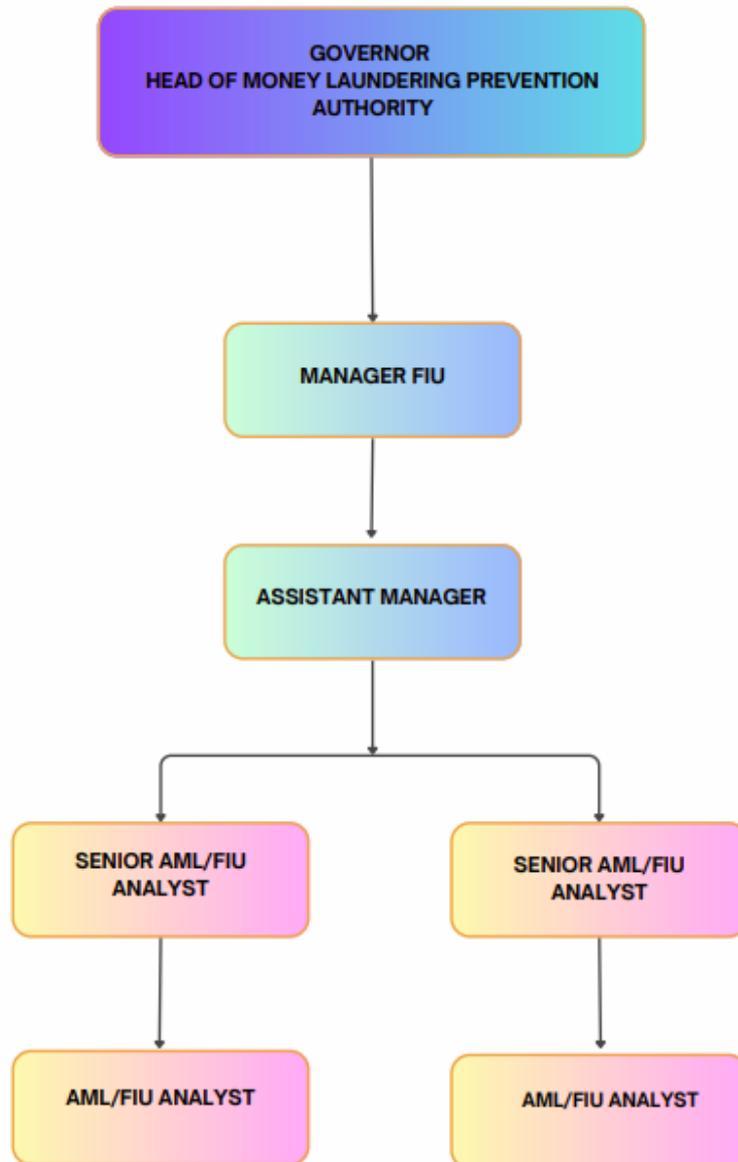
Equally important is the FIU's relationship with regional bodies such as

the Asia/Pacific Group on Money Laundering (APG) and other regional FIUs. The FIU remains committed to nurturing and strengthening these partnerships.



MAIAVA ATALINA AINUU-ENARI
GOVERNOR
AND HEAD OF THE MONEY LAUNDERING PREVENTION AUTHORITY

FIU ORGANIZATION STRUCTURE 2024/2025



ANTI MONEY LAUNDERING AND COUNTERING OF TERRORISM FINANCING FRAMEWORK

The FIU plays a central role in safeguarding the financial system and is responsible for:

- (1) Receiving and analyzing suspicious transaction reports as required under the Money Laundering Prevention Act 2007.
- (2) Investigating offences linked to money laundering, terrorism financing, and related crimes.
- (3) Sharing relevant information with competent authorities for enforcement or regulatory action.
- (4) Engaging in international cooperation to support global efforts in combating financial crimes.
- (5) Promoting awareness and education on anti-money laundering (AML) and counter financing of terrorism (CFT) issues.
- (6) Overseeing Designated Non-Financial Businesses and Professions (DNFBPs).

2024 – 2025
FIU YEAR IN REVIEW

STR
Suspicious
Transactions Reports
(STR) **90**

*decreased by 2%
from 2023/2024*

CTR
Cash
Transaction
Reports (CTR) **88,347**

*increased by 61%
from 2023/2024*

BCR
Border Cash Report
(BCR) **64**

*increased by 89%
from 2023/2024*

Disseminated

15
Intelligence
Reports to
Partner Agencies

 Issued
193
Repatriation
Approvals

Attended

12
Staff Training
and Meetings

 Received
48
Customer Due
Diligence

Collaborated with
AUSTRAC

to strengthen the FIU's
information technology
capabilities


Maintained ongoing
collaboration with financial
institutions and key
stakeholders

1. BACKGROUND

1.1 Financial Action Task Force (FATF)

Money laundering is a transnational crime and has become a global problem. In response to mounting concern over money laundering, the FATF was established in July 1989 by Group of Seven (G7) member countries in Paris. Its mandate focuses only on the fight against money laundering (ML) and terrorist financing (TF). In time, this has also included the fight against proliferation of weapons of mass destruction.

The FATF issued and developed a series of Recommendations which are recognized as international standards. They set and promote effective implementation of standards for combating ML, TF, and Proliferation. It is a requirement for FATF member countries and associate members to comply with AML/CFT global standards as set out in the 40 Recommendations.

The FATF currently comprises of 37-member jurisdiction and 2 regional organizations representing most major financial centres in all parts of the globe. Every FATF member country and associate members play a pivotal role in combating ML and TF. The FATF monitors the efforts of its members and associate members in promoting the adoption and implementation of the FATF Recommendations globally.

One of its core functions is to conduct peer reviews of each member on an ongoing basis to assess levels of implementation of the FATF Recommendations. The FATF Methodology document sets out the criteria for assessment which are based on two components (i.e.) Technical Compliance and Effectiveness. The components are rated at various levels as clarified in the following table:

TECHNICAL COMPLIANCE		EFFECTIVENESS RATINGS	
Compliant	There are no shortcomings	High	Minor Improvement needed
Largely Compliant	There are only minor shortcomings	Substantial	Moderate improvements needed
Partially Compliant	There are moderate shortcomings	Moderate	Major improvements needed
Non-Compliant	There are major shortcomings	Low	Fundamental improvements needed

1.2 ASIA PACIFIC GROUP (APG) ON MONEY LAUNDERING

The APG is an associate member of the FATF. It is an independent regional AML body, established in February 1997 by its thirteen original founding members at the 4th Asia Pacific Group on Money Laundering meeting in Bangkok. Its mandate also aims at combating ML and TF in the Asia and Pacific region. The APG uses the FATF's 40 recommendations as their principle guidelines for the implementation of an effective AML/CFT measure. The APG facilitates its members in promoting the implementation of the FATF 40 standards. The APG has been growing in membership. From its original thirteen founding member jurisdictions to now consisting of 42 active members making it the largest FATF-style regional body (FSRB) in the world. The APG has worked closely with the FATF since its establishment. The APG and FATF undertake joint mutual evaluations of its members under the FATF methodology.

1.3 FINANCIAL INTELLIGENCE UNIT (FIU)

Samoa became a member of the APG in July 2000. The Minister of Finance appoints the Money Laundering Prevention Authority (MLPA), and the Governor of Central Bank of Samoa (CBS) is the head of the MLPA. The MLPA established a unit known as the FIU in CBS on June 2000 to implement AML/CFT standards and conduct functions and powers as stipulated in the Money Laundering Prevention Act 2007. Samoa as an APG member is subject to the Mutual Evaluation (ME) program. Samoa had its first mutual evaluation in May 2001, second review in July 2006 and the third round in September 2015. Samoa has already gone through its 9th Follow Up Report and completed it in June 2023. Samoa's fourth round ME is tentatively scheduled for 2027. The Samoa FIU works closely with the APG in promoting the implementation of AML standards in Samoa.

2. OUR MANDATE

There are various changes to Samoa's AML/CFT legal framework since establishment of the Authority and FIU.

Samoa had its first AML legislation in 2000, which was repealed and replaced in 2007 when some key pieces of the legislation was passed to update the legal framework for criminalizing ML, Proceeds of Crime and operating the FIU. Amendments to MLP Act were passed in June 2018 which also provided consequential amendments to the Crimes Act 2013. Significant changes include provisions to increase ML penalties, expand the list of entities defined as financial institutions and other consequential changes.

The following is the list of legislation and guidelines administered by the FIU, together with other relevant legislation related to AML/CFT:

- Money Laundering Prevention Act 2007
- Money Laundering Prevention Regulation 2009
- Money Laundering and Terrorist Financing Prevention Guidelines 2010
- Counter Terrorism Act 2007
- Crimes Act 2013; and
- Mutual Assistance in Criminal Matters Act 2007

The Money Laundering Prevention Task Force (MLP Task Force) was set up to provide advice and recommendations to the Authority in relation to the prevention of ML and TF.

The Task Force often meets to ensure close liaison, cooperation and coordination between its members, the Authority, and the FIU.

The Task Force consists of the Governor as the Chairperson or such other person as may be designated by the Governor, the Attorney General, the Commissioner of Police, Chief Executive Officer (CEO) of SIFA, CEO of Customs and Revenue, Head of Immigration, Director of FIU, and such persons as may be appointed by the Minister, acting on the advice of the Authority.

The FIU is established under section 6 of the Money Laundering Prevention Act 2007 (MLP Act). The FIU coordinates every Task Force meeting and is one of the main agencies involved in the prevention and detection of money laundering and terrorist financing activities in Samoa. FIU is also responsible for the regulation, supervision and enforcement of AML and combating CFT requirements as specified under the MLP Act and the MLP Regulation 2009.

The functions and powers of the FIU are stipulated under the MLP Act which includes:

1. Receiving reports and information from domestic and foreign agencies about suspicions of a serious offence, a ML offence or the offence of the financing of terrorism.
2. Collecting information, it considers relevant to serious offences, money laundering activities or the financing of terrorism.
3. Analysing and assessing all reports and information.
4. Requesting information from any law enforcement agency or supervisory agency.
5. Providing information to foreign agencies for the prevention or investigation of money laundering or the prevention and suppression of terrorism.
6. Sending any report or information to the appropriate law enforcement and supervisory authorities.
7. Enforcing compliance by financial institutions with the requirements of the MLP Act.
8. Providing trainings for financial institutions and create public awareness programs.
9. Entering Memorandum of Understanding (MOU) with domestic and foreign agencies to ensure close liaison, cooperation, and secure exchange of information.
10. May instruct any financial institution to take such steps as may be appropriate in relation to any information.
11. Compile statistics and records, disseminate information within Samoa or elsewhere and make recommendations arising out of any information received.
12. Provide training programs for financial institutions in relation to customer identification.
13. Undertake due diligence checks and other inquiries when requested in writing by the Authority.
14. Provide outcome of report or information to financial institution and other relevant agencies.
15. Conduct research into trends and developments in the areas of money laundering and the financing of terrorism and improved ways of detecting, preventing, and deterring money laundering and the financing of terrorism; and

16. Educate the public and provide awareness programs relating to money laundering and the financing of terrorism.

Domestically, the FIU signed MOUs with members of the MLP Task Force including the Ministry of Police and Prisons, Ministry of Commerce and Labor (MCIL), Ministry of the Prime Minister and Cabinet (MPMC), Ministry of Finance (MOF), Ministry of Customs and Revenue (MCR), the Attorney General's Office (AGO), Samoa International Finance Authority (SIFA), Samoa Airport Authority (SAA), Samoa Audit Office (SAO) and the Ministry of Foreign Affairs and Trade (MFAT).

Internationally, FIU has been a member of the EGMONT GROUP of FIUs since July 2012. Moreover, Samoa FIU is one of the eight Pacific Island Countries (PIC) FIUs who has signed the Statement of Intent and is a member of the Pacific Financial Intelligence Community (PFIC). As such, it continues to actively engage in sharing and exchanging relevant information that may assist in the effective investigation and prosecution of money laundering and terrorist financing offences committed not only in Samoa but in the international arena as well. In moving forward, the FIU will seek to sign MOUs with other international Financial Intelligence Units in the fight against financial crime, including other serious criminal offence.

The FIU continues to liaise and consult with the key shareholders of the financial system on several critical issues. Their statutory obligations in keeping and maintaining customer and transaction records, the need for enhanced due diligence of customers, as well as the ongoing monitoring of customer's accounts and transactions alleged to be suspicious in nature.

3. REVIEW OF OPERATIONS IN 2024 - 2025

The FIU works closely with the APG in the implementation of international standards in Samoa.

3.1 THE APG AND THE AUTHORITY ACTIVITIES – IMPLEMENTING AML/CFT GLOBAL STANDARDS.

SUMMARY ACTIVITIES OF THE MONEY LAUNDERING PREVENTION AUTHORITY (MLPA)

The MLPA works to comply with the internationally recognized standards as promoted by the FATF and the APG on AML/CFT of which Samoa is a member. The MLPA also sets the strategic tone for anti-money laundering measures in Samoa, and this is implemented by its FIU. The FATF is an international organization that sets the global standards for AML. They divide their groups into regions, and Samoa is a member of the APG.

3.2 SAMOA NATIONAL RISK ASSESSMENT AND NATIONAL STRATEGY

In 2024, Samoa approved its National Risk Assessment (NRA) alongside the National Strategy for Combatting Money Laundering and Countering Terrorism Financing 2024 – 2026. These key documents establish the strategic priorities and objectives for the next three years and have been officially published on the Central Bank of Samoa’s website. They serve as a comprehensive framework to guide national efforts in strengthening Samoa’s Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) regime.

Importantly, the NRA and National Strategy play a critical role in preparing Samoa for its upcoming Mutual Evaluation in 2027. They provide a structured approach to identifying and addressing gaps within the current AML/CFT framework, ensuring that areas requiring improvement are effectively targeted. Through these initiatives, Samoa reaffirms its commitment to aligning with international standards and enhancing its national resilience against money laundering, terrorist financing and other financial crimes.

3.3 CONFISCATED ASSETS FUND (CAF)

The Governor is the Administrator of property forfeited or restrained under the Proceeds of Crime Act 2007 (“POCA”). Her appointment was made by the Attorney General under section 82 of POCA. As the Administrator of CAF, the Authority continues to liaise closely and work together with the Police, Customs and the Attorney General’s Office in transferring, storage, and safe keeping of these assets. The CAF team deposit account with the Samoa Commercial Bank (“SCB”) was opened with SAT\$40,000 (19 May 2016). The amount is rolled over for every twelve months at 2.75% interest rate. The balance stood on SAT\$53,823.04 as of May 2024 and SAT\$55,249.35 as of May 2025. The next maturity date is 18 May 2026.

3.4 QUARTERLY MEETINGS

The FIU continues to host quarterly meetings with the MLP Task Force members and AML Compliance Officers to discuss AML/CFT matters (issues, challenges, and way forward).

As part of its supervisory roles, the FIU will conduct trainings for financial institutions and Task Force members regarding their AML/CFT statutory functions and responsibilities to strengthen awareness and remain vigilant in detecting, deterring, disrupting, and preventing ML/TF activities.

3.5 FUNDING AND ADMINISTRATION

The Central Bank provides all the funding needed for the operation of the Samoa FIU. The annual budget of FIU is prepared each fiscal year and sent to the Board for approval after being reviewed by the CBS.

4. FIU CORE ACTIVITIES

The two major functions of the FIU are supervisory and intelligence work.

4.1 INTELLIGENCE

The Samoa FIU serves as the national centre for the purpose of receiving and analysing suspicious transaction reports (STRs), cash transaction reports (CTRs), border cash reports (BCRs), and other information pertaining to money laundering, terrorist financing, and other financial crimes.

One of the main responsibilities of the FIU is disseminating intelligence assessment reports (IAR) to government and law enforcement agencies for further investigations and suitable action.

FIU also helps with requests for information on any inquiries received from financial institutions and regulatory bodies, as well as requests for due diligence and mutual aid matters from government agencies.

Table 1. FIU performance output and activities for periods 2020-2021 to 2024-2025

	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
STRs Received	134	83	89	92	90
Disseminations	7	13	5	3	15
Requests	106	71	52	45	64
BCRS	13	15	35	34	64
CTRs	47,545	45,944	57,867	55,029	88,347

4.1.1 SUSPICIOUS TRANSACTION REPORTS (STRs)

It is a requirement in the MLP Act 2007 sections 23 and 24, financial institutions, regulatory bodies, and auditors are required to disclose STRs. The FIU will receive and analyse STRs and, if needed, disseminate these reports with the relevant authorities for information and further investigation where appropriate.

Table 2. Summary of STR reports FY 2024-2025.

STRs Received	90
STRs Disseminated	15

STRs File Away	75
----------------	----

4.1.2 CASH TRANSACTION REPORT (CTRs)

CTR is a report required under section 23(a) of the MLP Act. The Financial Institutions are required to report all cash transactions equivalent to SAT\$20,000 or more to the FIU on a weekly basis. The following table summarizes cash transactions reported by financial institutions from July 2024 to June 2025.

Table 3. Summary of CTRs filed by Financial Institutions 2024-2025

Financial Institutions	Total Number
Commercial Banks	87,302
Money Transfer Operations	1,045
TOTAL	88,347

4.1.3 BORDER CASH REPORT (BCRs)

It is a requirement in the MLP Act 2007 under section 13 for any person who leaves or enters Samoa to declare if they are carrying physical cash or negotiable bearer instruments equivalent to SAT20,000 or more and complete the border cash report. These reports must be filed with the FIU by any authorized officer who is on duty at the border. The FIU received a total of sixty-four (64) reports from the Ministry of Revenue and Customs for FY 2024-2025.

4.1.4 APPROVAL OF CURRENCY REPATRIATION

The FIU is obligated to issue approvals of currency repatriations for financial institutions and individuals who hand-carry cash equivalent of SAT\$20,000 or more outside of Samoa. A total of 193 approvals were issued in FY2024/2025, compared to a total of 194 approvals in the previous financial year.

Table 4. Summary of approvals issued by the FIU FY 2024-2025

FINANCIAL INSTITUTIONS AND INDIVIDUALS	NUMBER OF APPROVAL DENOMINATED IN SAMOAN TALA	NUMBER OF APPROVAL IN OTHER CURRENCIES	NUMBER OF APPROVALS IN BOTH SAMOAN TALA AND OTHER CURRENCES
Commercial Banks	1	24	11
Money Transfer Operators	33	72	28
Individuals (members of the public)	6	18	0
TOTAL	40	114	39

4.1.5 SAMOA FIU ENQUIRES WITH FINANCIAL INSTITUTIONS

Section 10 of the MLP Act 2007, the FIU has a power to examine the records and inquire about the business and affairs of financial institutions for the purpose of ensuring compliance with the Act or guidelines, or for the purpose of any investigation or analysis being undertaken by the FIU. As part of its analysis process, the FIU may enquire financial institutions to provide more information to develop further on information already provided on STRs. FIU queries may also relate to an ongoing investigation. FIU queries sent to financial institutions included request for:

- Account Opening forms.
- Customer IDs and verification documents.
- Account statements.
- Transaction Vouchers.
- Telegraphic Transfers both incoming and outgoing transaction (s) etc.

4.1.6 INVESTIGATIVE ASSISTANCE PROVIDED TO LAW ENFORCEMENT AGENCIES (LEAS)

The Samoa FIU also assisted law enforcement agencies such as the Samoa Police Prisons and Corrections Services for investigation purposes. During the review period there were 7 requests from our LEAs related to due diligence checks and background checks of an individual or entity this year.

4.1.7 DISSEMINATION OF INTELLIGENCE ASSESSMENT REPORTS

FIU has made 5 domestic requests to relevant competent authorities and 2 foreign requests to foreign FIUs for information and investigation. There were no requests received by Samoa FIU from foreign FIU via Egmont.

4.1.8 DUE DILIGENCE AND BACKGROUND CHECKS

Due diligence and background checks are other functions undertaken by the FIU in response to requests from financial institutions, law enforcement, and CBS internal departments. The goal of due diligence and background checks is to verify the legitimacy of a business or individual and determine whether there are any matches or hits regarding serious offenses, money laundering offenses, financing terrorism offenses, or any other offenses under the MLP Act. Open source and FIU intelligence technologies are used in these background assessment and due diligence.

The FIU conducted a total of forty-eight checks, many of the requests were from Government Ministries, Internal Departments of the Central Bank of Samoa, Financial Institutions, competent authorities, and Internal Departments of the Central Bank of Samoa to ensure their potential investors and customers have no record under the FIU Online Compliance System.

Table 5: Summary of CDD and Background Checks 2024-2025

Due Diligence Check	35
---------------------	----

Background Checks	13
Total	48

4.2 SUPERVISION

The FIU is required under the MLP Act to examine and supervise the financial institutions, through regular on-sites examinations, to ensure that a financial institution complies with the requirements of the Act. Guidelines are also issued to assist financial institutions to gain a better understanding of their obligations under the law. FIU also co-operates with law enforcement agencies, both foreign FIU's, in any investigations, prosecutions or proceedings relating to a serious offence, a money laundering offence, an offence of the financing of terrorism or any other offence under the MLP Act. Entities and businesses that are required to comply with the requirement of the MLP Act, these includes financial Institution such as:

- Commercial Banks.
- Money Transfer Operators.
- Trust or Company Service Providers (TCSP).
- Lawyers.
- Accountants.
- Casino.
- Insurance Business.
- Credit Unions.
- Real Estate Agents.
- Virtual Currency; and
- Non-Profit Organization.

4.2.1 ONSITE INSPECTIONS

To ensure all financial institutions adhere to the framework for money laundering prevention, particularly the requirements of the Money Laundering Prevention Act 2007 and the Money Laundering Prevention Regulation 2009, the FIU conducts onsite inspections.

The FIU will undertake AML/CFT onsite inspections of money transfer operators in the second half of 2024-2025. Furthermore, the FIU is currently also planning onsite inspections for casinos in the next financial year.

5. CO-OPERATION, COLLABORATION AND INFORMATION SHARING

5.1 ASIA PACIFIC GROUP (APG)

Samoa is a member of the APG, which the FIU collaborates with to make sure Samoa satisfies the necessary requirements. The FIU provides Samoa's follow-up reports, which describe our progress in putting the AML/CFT framework into practice, as part of the compliance assessment process after consulting with financial institutions and

Taskforce members. In exchange, the APG evaluates the follow-up reports and makes suggestions for improvement. To support FIU's efforts, the APG and FIU have also collaborated to evaluate Samoa's needs and have offered technical help and training.

5.2 PACIFIC FINANCIAL INTELLIGENCE COMMUNITY

PFIC is a regional body consisting of FIUs in the Pacific. The PFIC Statement of Intent signed in Cook Islands in November 2023 provides a mutual understanding that PFIC will be a forum for Pacific FIUs to focus on operational outcomes, and other issues of specific interest to the Pacific region. AUSTRAC provides secretarial support for PFIC.

One initiative introduced by PFIC is the Multilateral Intelligence Projects (MIP) aimed at tackling cross-border crimes with links to money laundering and terrorist financing. A MIP was proposed by Fiji in 2024 and was approved and funded by AUSTRAC. This MIP involved Samoa FIU, AUSTRAC, Fiji FIU and Tonga FIU. The report for this MIP is being finalized and will be disseminated to relevant local government agencies for their intelligence work.

5.3 EGMONT

The Egmont Group is a network of FIUs with 177 members that was established to operate as a confidential information sharing platform to fight money laundering and the funding of terrorism. Among FIUs, this is a crucial instrument for information collection and intelligence sharing.

Table 6: Summary of Egmont requests received and disseminated in FY 2023 – 2024 and FY 2024 - 2025.

	FY 2023–2024			FY 2024-2025		
	Country	Amount		Country	Amount	
Requests received through Egmont	Nil	0		Nauru	1	
	Total	0		TOTAL	1	
Requests made through Egmont	China	Mainland	11	AUSTRAC		3
		Macau	1	China	Hong Kong	17
		Taiwan	2		Mainland	1
		Hong Kong	3		Macau	1
	Japan	1			Taiwan	3
	Pakistan	1		Ecuador	1	
	Republic of Korea	1		New Zealand	1	
	Tonga	1		Pakistan	4	
	Vietnam	2		Republic of South Korea	1	
				USA	1	
				Vanuatu	1	
	Total	23		Total	34	

6. CAPACITY BUILDING

One of the initiatives being undertaken by FIU is to enhance the professional capabilities of its employees in the areas of AML and CFT, as well as to enhance their ability to perform their duties in a way that is sustainable, effective, and efficient. Additionally, the FIU provides compliance and AML/CFT training to financial institutions and some LEAs. This is to guarantee that all parties involved are knowledgeable about AML issues and appropriate procedures.

6.1 AML/CFT INTERNATIONAL DONORS AND TECHNICAL ASSISTANCE PROVIDERS

The Central Bank is grateful for the technical assistance and training opportunities received over the past years from the following organizations:

- Asia Pacific Group on Money Laundering (APG).
- International Monetary Fund (IMF).
- Asian Development Bank (ADB).
- United Nations Office on Drugs Control and Crime Prevention (UNODCCP).
- Pacific Financial Technical Centre (PFTAC).
- Australian FIU (AUSTRAC).
- New Zealand FIU.
- Anti-Money Laundering Assistance and Training of Australia (AMLAT).
- Pacific Financial Intelligence Committee (PFIC).
- Interpol General Secretariat.
- ADB/OECD Initiative on Anti-Corruption.

Their assistance helped to develop and strengthen the capacity of the Samoa Money Laundering Prevention Authority to effectively undertake and implement its statutory role and functions in combating financial crimes.

6.2 ONGOING AWARENESS AND TRAININGS

The FIU has opportunities to provide financial institutions, law enforcement, and other government agencies with AML/CFT training. The major goal is to increase awareness and to stress once more how crucial their roles are in identifying, discouraging, stopping, and preventing ML/TF actions. We will plan more refresher trainings for the financial institutions and MTOs this year.

6.2.1 TRAININGS AND WORKSHOPS, FIU STAFF HAS PARTICIPATED FOR THE PERIOD UNDER REVIEW.

Incorporating the various training sessions and workshops attended by the FIU is crucial as it highlights continuous efforts to enhance our skills and knowledge. These learning opportunities serve as a platform to better equip the FIU in providing tailored and effective training programs for financial institutions and Money Transfer operators (MTOs) under our regulatory oversight. By staying informed and up to date with the latest industry trends and practices, we are better positioned to fulfil our role as regulators and support the growth and compliance of the relevant agencies, financial institutions, and MTOs we oversee.

Table 7: Training and workshops 2024 - 2025, FIU staff participates.

Year	Course/Meeting/Workshop	Country/Venue
2024		
August	Financial Intelligence Analyst Course	Australia
	Multilateral Intelligence Project	Australia
September	APG Plenary	Abu Dhabi
November	Typologies	Malaysia
	3 rd Pacific Financial Intelligence Community Meeting	Australia
	Counter Proliferation Finance	Fiji
December	Financial Investigative Techniques	Thailand
2025		
February	Regional Conference on Transparency of Beneficial Ownership in the Pacific	Fiji
April	Joint Assessor Trainings	India
	Open-Source Intelligence Course	Samoa
May	APG Mutual Evaluation Preparation Workshop	Fiji
June	Biz-online Course on Finance Innovation and Technology	Virtual

7. Systems

7.1 Taipan System

To increase practical cooperation and strengthen regional resilience across the Indo-Pacific region, the Samoa FIU also works collaboratively with the Australian Transaction Reports and Analysis Centre (AUSTRAC). As part of their tailored programs on building and sharing financial intelligence and analytic expertise across the region, our FIU were fortunate to receive the AUSTRAC’s Taipan System which will support in strengthening the staff’s capability in the analysis aspect of our financial intelligence responsibilities. It will enable data such as CTRs, STRs and BCRs to all be combined in one system, whereby visuals and trends can be produced for analysis purposes.

The TAIPAN is a Software Platform designed by AUSTRAC’s IT experts and financial intelligence analysts to help detect and analyse suspicious financial patterns associated with a range of criminal activities including money laundering as well as funds linked to serious and organized crime. It is a secure and efficient database platform that collects, analyses and exchange financial intelligence and can be tailored to complement most financial intelligent units existing IT environment.

The TAIPAN system was installed in June 2024 by AUSTRAC with associated initial training undertaken at the same time. FIU continues to increase its capacity in using the Taipan system and aims to better utilize its analytical functions.

8. LIST OF ACRONYMS

ADB	Asian Development Bank
------------	------------------------

AML/CFT	Anti Money Laundering / Countering the Financing of Terrorism
APG	Asian Pacific Group on Money Laundering
AUSTRAC	Australian Transaction Reports and Analysis Centre
BCR	Borders Control Report
CAF	Confiscated Assets Fund
CBS	Central Bank of Samoa
DNFBP's	Designated Non-Financial Business and Professions
FATF	Financial Action Task Force
FI	Financial Intelligence
FIU	Financial Intelligence Unit
FSRB	FATF Style Regional Bodies
FUR	Follow Up Report
IMF	International Monetary Fund
MCIL	Ministry of Commerce and Labor
MER	Mutual Evaluation Report
MFAT	Ministry of Foreign Affairs and Trade
MCR	Ministry of Customs and Revenue
MLP Act	Money Laundering Prevention Act
MLPA	Money Laundering Prevention Authority
MLPR	Money Laundering Prevention Regulation
MOF	Ministry of Finance
MOU	Memorandum Of Understanding
MPMC	Ministry of the Prime Minister and Cabinet
MTO	Money Transfer Operators
NRA	National Risk Assessment
PFIC	Pacific Financial Intelligence Community
PFTAC	Pacific Financial Technical Assistance Centre
PIC	Pacific Island Countries
POCA	Proceeds Of Crimes Act
SAA	Samoa Airport Authority
SAO	Samoa Audit Office
SFIU	Samoa Financial Intelligence Unit
SIFA	Samoa International Finance Authority
STR	Suspicious Transaction Report
TC	Technical Compliance
UNODC	United Nation Office on Drugs and Crime