



CENTRAL BANK OF SAMOA

**FINANCIAL INTELLIGENCE UNIT**  
**ANNUAL REPORT**  
**JULY 2020 – JUNE 2021**

## 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.

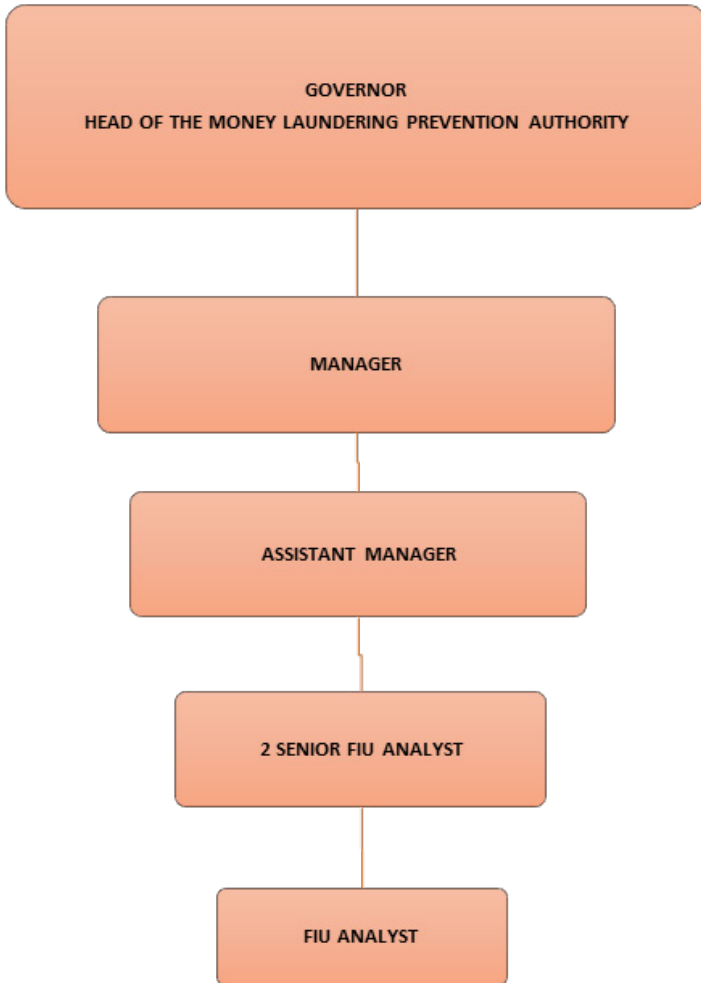
An effective AML system requires appropriate laws, motivated sufficiently resourced and informed authorities, and an engaged private sector.

AML 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

- i. Strengthen AML/CFT capacity in view of risks and vulnerabilities of Samoa's financial sector;
- ii. Improve compliance of AML/CFT regime with Financial Action Task Force (FATF);
- iii. Improve information and intelligence network;
- iv. 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; and
- v. 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.

# OUR STRUCTURE



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## GOVERNOR'S FOREWORD

It is my great pleasure as the Governor and Head of the Money Laundering Prevention Authority to introduce the 2020-2021 Annual report for the Samoa Financial Intelligence Unit (FIU). The FIU was established under the Money Laundering Prevention Act 2007 (MLP Act) to carry out the implementation of the international Anti Money Laundering and Counter Financing of terrorism (AML/CFT) standards or the Financial Action Task Force (FATF) standards. It is currently a department under the Central Bank of Samoa.

This report will look at providing a summary of the work and activities that the FIU has carried out. This annual report will also provide the mandate and the duties and responsibilities of the FIU. In a nutshell during this time the FIU has carried out extensive work in implementing the AML/CFT standards.

This year the FIU had a full schedule to carry out AML/CFT onsite inspections for the financial institutions namely the Commercial Banks and the Money Transfer Operators (MTOs). Unfortunately, due to the pandemic of the Coronavirus (COVID-19) and the Samoa State of Emergency declarations only nine MTOs have been inspected. The inspection for other MTOs and Commercial Banks has been postponed until further notice. FIU also conducted refresher training for FIs compliance and other staff during the onsite inspection regarding their requirements under the law.

In addition, the FIU Information Communication Technology (ICT) database system on Cash Transaction Report (CTR) has implemented the inclusion of the online reporting of Suspicious Transaction Report (STR) and Border Cash Report (BCR), this is part of our continuous efforts to address anti-money laundering and countering terrorist financing issues. The rationale is to ensure that our financial system is well protected from the potential threat of money laundering and terrorist financing channeling through our financial system in large amounts. Also, this contributes to the solution of de-risking or the closing down of bank account of MTOs by correspondents' banks. The system was designed by a local ICT company - Computer Service Limited ("CSL") and funded by the Asia Pacific Group ("APG") grant from the New Zealand Foreign Affairs and Trade.

The FIU also received Technical Assistance (TA) from Asia Development Bank (ADB) for the purpose of conducting its detailed National Risk Assessment (NRA) in accordance with the requirements of the FATF. The ADB is also funding a project intended to develop a Know Your Customer (KYC) and Customer Due Diligence (CDD) application for Money Transfer Operators and local Commercial Banks in Samoa. This is a pilot project in which Samoa and ADB are leading in order to resolve Correspondent banking de-risking issues. The project is still in development phase. The APG also hired a TA to assist Samoa in preparation for its next Follow-up Assessment (FUA) on effectiveness scheduled for 2021-2022. This project is currently in progress.

FIU continues to work with other regional FIUs and relevant international agencies, to share relevant information and attend trainings that will improve our capacity to combat money Laundering. FIU acknowledges that cooperation between our financial institutions and our national agencies is vital for strengthening our AML/CFT framework, we continue to work to maintain this cooperation. Also vital is the relationship with our regional partners such as the APG and regional FIU's and our goal is to foster and strengthen these relationships



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Maiava Atalina Ainuu-Enari

**GOVERNOR**

**AND HEAD OF THE MONEY LAUNDERING PREVENTION AUTHORITY**

## 1. BACKGROUND

### *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 in 1989. Its mandate focuses only on the fight against money laundering (ML) and terrorist financing (TF).

The FATF issued and developed a series of Recommendations that 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 37-member jurisdiction and 2 regional organizations representing most major financial centers in all parts of the globe. Every FATF member countries 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 was based on two components (i.e.) Technical Compliance and Effectiveness. The components are rated at different levels as clarified in the following table:

TECHNICAL COMPLIANCE RATINGS		EFFECTIVENESS RATINGS	
Compliant	There are no shortcomings	High	Minor improvements 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.



### ***Asia Pacific Group (APG)***

The APG is an associate member of the FATF. It is an independent regional AML body, established in February 1997 by its 13 original founding members at the 4th Asia Pacific Group on Money Laundering meeting in Bangkok. Its mandate also aims on combating ML and TF in the Asia and Pacific region. The APG uses the FATF's 40 recommendations as their principle's guidelines for the implementation of an effective AML/CFT measures. The APG facilitates its members in promoting the implementation of the FATF 40 standards.

The APG has been growing in membership. From its original 13 founding member jurisdictions it now consists of 41 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.

### ***Financial Intelligence Unit (FIU)***

Samoa has become a member of the Asia Pacific Group in July 2000. The minister of finance appointed the Money Laundering Prevention Authority (MLPA) who

is headed by the governor of the Central Bank of Samoa (CBS). The Authority established a unit in CBS, which is the Financial Intelligence Unit in June 2000 to implement AML standards and carry out functions and powers as stipulated in the Money Laundering Prevention Act.

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 is required to provide its 7th follow up report to the APG by June 2022. 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 the 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 is also part of the Crimes Act 2013. Significant changes include provisions to increase ML penalties, expand the list of entities define as financial institutions and other consequential changes.

The following is the list of legislation administer by the FIU and other related legislation to AML/CFT:

- Money Laundering Prevention Act 2007;
- Money Laundering Prevention Regulation 2009;
- Money Laundering and Terrorist Financing Prevention Guidelines 2010;
- Counter Terrorism Act 2014;
- Proceeds of Crimes Act 2007; and
- Mutual Assistance in Criminal Matters Act 2007

The Money Laundering Prevention Task Force was established to provide advice and recommendations to the Authority in relation to the prevention of ML and TF. The task force regularly meets to ensure close liaison, cooperation and coordination between its members, the Authority and the FIU.

The MLP 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, CEO of SIFA, head of Customs, head of Immigration, director of FIU, director of the Public Prosecution; 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 (MLP Act) 2007. 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 anti-money laundering (AML) and combating the financing of terrorism (CFT) requirements as specified under the MLP Act and the Money Laundering Prevention Regulations (MLPR) 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. Analyzing 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 into 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 as may be 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;

rorism and improved ways of detecting, preventing and deterring money laundering and the financing of terrorism;

16. educate the public and also 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 Labour (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 is a member of the EGMONT GROUP of FIUs since July 2012. Additionally, FIU signed Memorandum of Understandings (MOU) with other international FIUs including Indonesia FIU Fiji FIU and lately with PNG FIU. Moreover, Samoa FIU is one of the eight Pacific Island Countries (PIC) FIUs who signed the regional MOU and is a member of the Association of Pacific FIU (APFIU). As such, it can now 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 is planning to sign MOUs with other international Financial Intelligence Units in the fight against financial crime, including other serious criminal offences.

The FIU continued to liaise and consult with the key shareholders of the financial system on a number of important issues. In particular, their statutory obligations in keeping and maintaining customer and transaction records, the need for enhanced due diligence of particular customers, as well as the ongoing monitoring of customers' accounts and transactions alleged to be suspicious in nature.

### **3. REVIEW OF OPERATIONS IN 2020-2021**

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 OF ACTIVITIES OF THE MLP AUTHORITY**

The Money Laundering Prevention Authority (“the Authority”) works to comply with the internationally recognized standards as promoted by the FATF and the APG on Money Laundering, of which Samoa is a member. The Authority 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 anti-money laundering (“AML”). They divide their groups into regions, and Samoa is a member of the APG.

#### ***3.1.1. Samoa’s Enhanced Follow-up Report (“FUR”) to the APG***

Samoa submitted its Enhanced Follow up Report to the APG on 11th June 2021 as required under the APH Third Round

Mutual Evaluation Procedures 2018. In light of the progress made since the last follow-up report, Samoa did not seek for any technical compliance re-ratings for this year 2021. Samoa will continue to work on reforms to rectify deficiencies as identified in its MER 2015. Samoa’s Follow-up Assessment (“FUA”) is scheduled in 2021-2022.

#### ***3.1.2. Samoa’s 6th Enhanced Follow-up Report (“FUR”) to the APG***

Samoa submitted its 6th Enhanced Follow up Report to the APG on 3rd June 2021 as required under the APG Third Round Mutual Evaluation Procedures 2018. In light of the progress made since the last follow-up report, Samoa did not seek for any technical compliance re-ratings for this year 2021. Samoa will continue to work on reforms to rectify deficiencies as identified in its MER 2015. Samoa’s Follow-up Assessment (“FUA”) is scheduled in 2021-22.

#### ***3.1.3. Samoa’s National Risk Assessment (NRA)***

Through APG, the Asia Development Bank (ADB) provided Samoa support and funds for a consultant who is presently collaborating with SFIU to update the National Risk Assessment (NRA). Samoa’s second NRA is due to be finished

in August, that will contribute to the design of a new National Strategy for Combating Money Laundering and Countering Terrorism Financing, which is due in December.

### **3.2 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 the Confiscated Assets Fund (“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 term deposit account with the Samoa Commercial Bank (“SCB”) was opened with \$40,000 (19 May 2016). The amount is rolled over for every twelve months at 3% interest rate. The balance stood at \$49,495.68 as of May 2021. The next maturity date is on 19 May 2022.

### **3.3 Quarterly Meetings**

The FIU continues to host Quarterly meetings with the AML Task Force members and FIs 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 in order to strengthen awareness and remain vigilant in detecting, deterring, disrupting and preventing ML/TF activities.

### **3.4 Funding and Administration**

The operation of the Samoa FIU is fully funded by the Central Bank. Every financial year, the FIU has to prepare its annual budget and submitted to the CBS Budget Committee for review and then to the Board for approval.

## **4 FIU CORE ACTIVITIES**

The FIU has two core functions, Intelligence work and supervisory role.

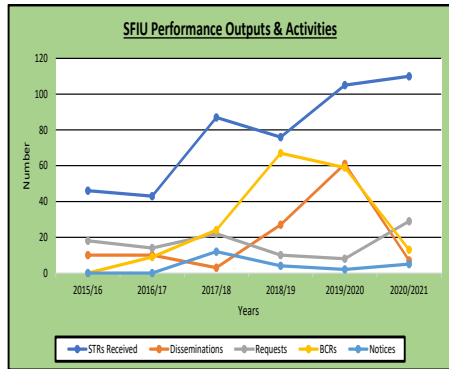
### **4.1 Intelligence**

The FIU serves as the national center for the receipt and analysis of suspicious transaction reports (STRs), cash transaction report (CTR) border cash reports (BCRs) and other information relevant to money laundering and financing of terrorism. One of the core functions of FIU is to disseminate intelligence assessment report to law enforcement agencies, government authorities for further investigation and appropriate action.

FIU also assist with requests from government agencies for due diligence and mutual assistance matters as well as to financial institutions and regulatory agencies for information on any enquiries received.

Below is a highlight of FIU performance outputs and activities for the period (2012-2021)

	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021
STRs Received	43	87	76	105	134
Disseminations	10	3	27	61	7
Requests	14	22	10	8	106
BCRs	9	24	67	59	13
Notices	0	12	4	2	5



Source Samoa FIU

**i. Suspicious Transaction Report:**

The reporting of STRs is an obligation of financial institutions and supervisory authorities and auditors under section 23

and 24 of the MLP Act 2007. The FIU received, analyzed and disseminate the reports to relevant AML/CFT counterparts for information and investigations where appropriate.

The following table summarizes reports received and disseminated during this period.

STRs Received	134
STRs Disseminations	7

**ii. Border Cash Report:**

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 file to the FIU by any authorized officer who is on duty at the border.

During this period, no report was received by the FIU from the Customs regarding cash declaration at the border since the borders remain closed, due to the pandemic.

### iii. Approval of Currency Repatriation

The FIU is accountable for issuing approvals of currencies repatriation for financial institutions and individuals who are hand-carrying cash equivalent to SAT\$20,000 or more outside of Samoa. A decrease in the number of currency repatriation approvals from the last financial year (2019-2020) was due to the outbreak of COVID-19.

A table below summarizes approval issued by the FIU during this period.

FINANCIAL INSTITUTIONS	TOTAL NUMBER
Commercial Banks	46,463
Money Transfer Operators	1,700
<b>TOTAL</b>	<b>48,163</b>

### iv. Cash Transaction Report:

CTR is a new report required under Section 23(a) of the MLP Amendment Act 2018. 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 2020 to June 2021.

FINANCIAL INSTITUTIONS	TOTAL NUMBER
Commercial Banks	46,463
Money Transfer Operators	1,700
<b>TOTAL</b>	<b>48,163</b>

Source Samoa FIU

### v. Alert Notices to Financial Institutions

The FIU issued two (5) notices during the reviewed period mostly to alert people on investments schemes such as smart finance investment, sow n' reap, regifting, Talimana'o club bonus and online fraud.

### vi. FIU Enquiries with Financial Institutions

Under section 10 of the MLP Act, the FIU has powers to examine the records and inquire into 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 in coming and outgoing transaction (s) etc.

#### **vii. Investigative assistance provided to Law Enforcement Agencies**

The FIU also assist law enforcement agencies such as the Police for investigation purposes. During the reviewed period one request was received from law enforcement agencies. Twenty (20) requests received from other government ministries relates to due diligence check or background check of an individual or a company.

#### **viii. Dissemination of Intelligence Assessment Reports**

During the reviewed period, 9 Intelligence Assessments Reports (IAR) were disseminated to Police and other law enforcement agencies (i.e., Ministry of Customs and Revenue) for further investigations and action. Most of this intelligence reports relates to predicate

offences such as forgery and fraud and other criminal cases. Three (3) IARs were disseminated to other relevant authorities (i.e. Ministry of Prime Minister & Cabinet, Audit Office, Ministry of Finance (MOF), and SIFA) for intelligence purposes.

FIU received three (3) requests for information from foreign FIU via Egmont. The requests are more related to information regarding an offshore company register in Samoa and information pertaining person of interest. FIU also made two (2) requests to Foreign FIUs for information to assist with Police investigation and other law enforcement agencies request.

#### **ix. Customer profiling and due diligence checks**

Another function of the FIU is to conduct due diligence and background checks for requests from financial institutions, competent authorities and internal departments of the CBS. The purpose of the due diligence/background checks is to screen the legitimacy of a company/individual and also to see if there's a match/hits that a particular company/individual has in relation to serious offences, money laundering offences, an offence of financing terrorism or any

other offences under the MLP Act.

Due Diligence Checks	34
Background Checks	68
TOTAL	<b>102</b>

## 4.2 Supervision

The FIU is required under the MLP Act to examine and supervise the financial institutions, through regular on-sites examinations, 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 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
- Non-Profit Organization

### (i) Onsite Inspections

The Financial Intelligence Unit (FIU) performed an onsite examination to ensure that all financial institutions comply with the Money Laundering Prevention framework. To determine whether financial institutions are complying with their obligations under the Money Laundering Prevention Act and Regulation on a technical level.

An Onsite inspection was scheduled for FIs (i.e., Commercial Banks and Money Transfer Operators (MTOs) in March to April 2020. Unfortunately, due to the pandemic of the Coronavirus (COVID-19) and the Samoa State of Emergency declarations, so far nine (9) of eleven (11) MTOs have been inspected. Overall, a very good improvement since the last visit in 2018. A few MTOs did an excellent job in enhancing their AML/CFT program while some are recommended to address some minor issues related to

their AML/CFT program. The inspection for other MTOs and Commercial Banks has been postponed until further notice.

## **(ii) Compliance Officers AML/CFT Regular Meetings**

The FIU efforts includes regular meetings for financial institutions compliance officers for which is conducted every year. The main purpose of this meetings is to provide update, share ideas and challenges concerning AML/CFT matters.

## **5. CO-OPERATION, COLLABORATION AND INFORMATION SHARING**

The FIU collaborates with various bodies and partners in implementing the FATF Standards as well as exchanging of information and intelligence in the effort to combat money laundering and counter terrorism financing. These include:

### **5.1 APG**

The FIU works together with the APG (of whom Samoa is a member) in ensuring that Samoa meets the required standards. As part of assessing compliance the FIU (in consultation with FIs and Task-force members) submits Samoa's follow-up reports detailing our progress in implementing the AML/CFT framework. In return the APG assesses the follow-up

reports and provides recommendations on what needs to be improved. The APG and FIU have also worked collaboratively in assessing Samoa's needs including providing training and technical assistance to further bolster FIU's work.

### **5.1.1 FIU ICT Database System**

On the 12 November 2019, the FIU ICT System for CTR reporting through internet was effectively deployed. Most Financial Institutions (i.e. Commercial Banks and Money Transfer Operators) are required to electronically report cash transactions totaling SAT\$20,000 or more. Sending, receiving, trading money, or any other sort of monetary transaction falls under this category. The FIU then gains access to the system in order to analyze the CTR's traffic volume. This web-based system was created in response to the growing volume of cash transactions reported to the FIU (as opposed to reporting it manually). In February 2021, the design and implementation of the electronic reporting of the STR and BCR were completed. The two reports will go live once all FIs have received training on how to utilize the report through online, which will take place in the first week of October. The Asia Pacific Group ("APG") grant from the New Zealand Ministry of Foreign Affairs and Trade is funding this initiative.

## 5.2 EGMONT

Egmont group is a network group of FIUs (containing 159 members) that was created to provide a forum for the exchange of information confidentially to combat money laundering and Counter terrorism financing. This is an important tool for gathering information and disseminating intelligence between FIUs.

Below is a brief summary of request the FIU received and made via Egmont during the period under review.

YEAR	REQUESTS RECEIVED THROUGH EGMONT	Country	REQUESTS MADE THROUGH EGMONT	COUNTRY
2020	1	India	1	Australia
2021	1	Taiwan	1	New Zealand
<b>TOTAL</b>	<b>2</b>		<b>2</b>	

Requests Received	2
Requests Made	2

## 5.3 EXCHANGE OF INFORMATION / MEMORANDUM OF UNDERSTANDING

FIU has signed Exchange of information agreements and memorandum of understandings with various agencies as part of the ongoing fight against Money Laundering and Counter Terrorism Financing. These include various local

ministries and agencies as well as other Financial Intelligence Units such as Fiji, Indonesia and Papua New Guinea. These agreements provide guidance in the disseminating of information related to AML/CFT requests submitted by both parties. These types of agreements will continue to increase as the need for inter FIU cooperation becomes more important to address the challenges of AML/CFT. No agreements signed during the period under review.

## 6. CAPACITY BUILDING

One of the FIU efforts is to develop and strengthen professional skills for FIU staff in the AML and CFT area, and to improve performance in the execution of tasks and responsibilities in an effective, efficient and sustainable manner.

The FIU also undertakes AML/CFT trainings and compliance trainings for financial institutions and some LEAs. This is to ensure that all stakeholders are well versed with AML matters and best practices.

## 6.1 AML/CFT International Donors and Technical Assistance Providers

The Central Bank is very 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 Global Program 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 Anti-Money Laundering Project (PALP) of the US;
- Alliance for Financial Inclusion (AFI);
- Interpol General Secretariat; and the
- 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 continues to offer AML/CFT training to financial institutions, competent authorities and other government agencies. The main purpose is to raise awareness and to re-emphasize the importance of their roles in detecting, deterring, disrupting and preventing ML/TF activities.

### a. Trainings and Workshops FIU staff participates for the period under review

**Table 1: Training and workshops FIU staff participates**

Year	Course	Venue
27 July 2020	Training on National Risk Assessment Methodology	Level 6, Conference Room, Central Bank Building.
6 Aug to 24 Sept 2020	Central Bank Foreign Currency Operations	Virtual meeting
25 August 2020	World Check – Tips and Tricks refresher training	Virtual meeting
2-6 February 2021	APG Typologies Workshop	Virtual meeting
21 February 2021	Refinitiv World Check One training	Virtual meeting
21-24 June 2021	Webinar on the European Union's (EU) list of non-cooperative jurisdictions for tax purposes and that of high-risk third	Virtual meeting

### b. AML/CFT Awareness Trainings for Financial Institutions

**Table 2: AML/CFT Awareness Trainings for Financial Institutions**

YEAR	COURSE	VENUE
2020	Fexco – New Recruits Training on AML/CFT	Fexco
4 March 2021	Cash Transaction Reports refresher training for BSP	BSP
30 March 2021	Introduction to Money Laundering Obligations as a Financial Institution	Vodafone

**c. United Nation Office on Drugs and Crimes (“UNODC”)**

The UNODC is a global leader in the fight against illicit drugs, crime in all its forms, and terrorism. The UNODC maintain an eLearning platform (an interactive tool) specifically designed to assist AML authority and other relevant agencies with enhancing their capacities in the fighting of money laundering and counter terrorism financing.

The UNODC provides assistance and access to FIU and other LEAs staff to complete 13 modules courses on ML and TF and other related crimes. The UNODC e-Learning program is a positive way to improve the standard of the FIU and its task force members, and to assist with the implementation of AML/CFT standards, as well as the development of policies and procedures in Samoa.

**d. ADB – “KYC Utility”**

The FIU is also participating in a regional KYC project led by the Reserve Banks of

Australia and New Zealand, which encompasses the Pacific Central Banks. The project aims at providing a KYC framework and solution that will look to address the correspondent banking issues faced by the region. The project on KYC utility is in progress, where as a new vendor has been selected and he is working with CBS and MTOs to implement the project to be completed by the next financial year.

## 7. LIST OF ACRONYMS

ACAMS	Association of Certified Anti-Money Laundering Specialists
ADB	Asia Development Bank
AFI	Alliance for Financial Inclusion
AGO	Attorney General's Office
AML/CFT	Anti-Money Laundering/Countering the Financing of Terrorism <i>(also used for Combating the financing of terrorism)</i>
APFIU	Association of Pacific FIU
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
DNFBPs	Designated Non-Financial Business and Professions
FATF	Financial Action Task Force
FI	Financial Institution
FIU	Financial Intelligence Unit
FSRB	FATF Style Regional Bodies
FUR	Follow-up Report
ICRG	International Cooperation Review Group
IMF	International Monetary Fund
MCIL	Ministry of Commerce Industry and Labour
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 Operator
NRA	National Risk Assessment
PFTAC	Pacific Financial Technical Assistance Centre
PIC	Pacific Island Countries
POCA	Proceeds of Crimes Act
RBA	Risk Based Approach
SAA	Samoa Airport Authority
SAO	Samoa Audit Office
SFIU	Samoa Financial Intelligence Unit
SIA	Samoa Institute of Accountant
SIFA	Samoa International Finance Authority
STR	Suspicious Transaction Report
TC	Technical Compliance
UNODC	United Nation on Drugs and Crime