Samoa National Anti-Money Laundering and Combating Financing of Terrorism (AML/CFT) Strategy

2024-2026

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Introduction

Money laundering (ML) and terrorist financing (TF) undermine the integrity of our financial institutions and markets, enable criminals to hide, store and benefit the proceeds of their crime, and enable terrorist groups to function, recruit and commit terrorist acts.

The National Strategy 2024-2026 sets out the approach which Samoa will adopt to tackle ML and TF over the next three years. In addition, it describes the priorities and objectives in addressing ML and TF, and assists Samoa in meeting international obligations set by the Financial Action Task Force (FATF).

The Strategy is based on the findings of the third National Risk Assessment (NRA), which is adopted by the Government of Samoa on May 2024 and the gaps identified in the Mutual Evaluation Report (MER) of Samoa, which was adopted and published by the Asia Pacific Group on Money Laundering (APG) in September 2015. The NRA has identified high risk areas and measures the ability of Samoa's national institutional framework and operating model to mitigate those risks. The NRA report also guides relevant authorities to prioritise actions to strengthen the national ML combating ability factors and anti-money laundering and combating financing of terrorism (AML/CFT) controls in Samoa. The MER also sets out the key shortcomings in Samoa's AML/CFT framework and prioritised them. The Strategy which takes account of the recommendations from both reports has been developed to assist Samoa in strengthening its AML/CFT institutional and legal framework.

The NRA has identified and assessed the threats, for example, the major crimes generating proceeds and vulnerabilities, that is, the sectors and products exposed to abuse or misuse, that Samoa is exposed to, as well as the national combatting abilities, that is, investigation, prosecution and asset forfeiture regime. The NRA also allows Samoa to determine how vulnerable the financial institutions (FIs), designated non-financial businesses and professions (DNFBPs), non-profit organisations, and legal entities and arrangements are to ML and TF.

The NRA of Samoa was conducted through a collaborative process involving all key stakeholders. Samoa's Financial Intelligence Unit (SFIU) was responsible for the coordination of the project with the technical support of the Asian Development Bank's consultant and the involvement of all key stakeholders, including the Attorney General's office, Ministry of Police, Ministry of Customs and Revenue, Ministry of Commerce, Industry and Labour, Ministry of the Prime Minister and Cabinet, Transnational Crime Unit, Immigration Division, Ministry of Finance, Samoa International Finance Authority, Samoa Airport Authority, Samoa Audit Office, Ministry of Foreign Affairs and Trade, Central Bank of Samoa, Gambling Casino Authority and representatives of the private sector.

Key findings of the NRA

In May 2024, the Government of Samoa approved its third NRA. The main objective of the NRA is to devise an effective risk-based AML/CFT regime through an efficient allocation of resources and the adoption of measures which will prevent or mitigate ML and TF on the basis of identified risks. For that purpose, the following factors were assessed under the risk assessment framework:

a) the scale and characteristics of the proceeds of criminal activities from both internal and external sources;
b) the scale and characteristics of terrorist financing in Samoa;
c) the weaknesses or gaps in Samoa's ability to combat ML and TF;
d) the ML weaknesses or gaps arising from the financial services sector and designated non-financial businesses and professions (DNFBPs) in the country; and
e) the ML threats and vulnerabilities associated with legal entities and legal arrangements operating in Samoa and the NPOs sector in the country.

The overall ML risk of the country is assessed as **MEDIUM** by the NRA, comprising of **MEDIUM-LOW** level of threat and **MEDIUM** level of ML vulnerability.

The NRA findings show that domestic proceeds-generating crimes presents **LOW** ML threat to Samoa, whereas the threat coming from proceeds of crimes committed outside of the country's territory is rated as **MEDIUM-LOW**. Samoa is relatively free from the influence of organised crime; the main domestic crime types being relatively crimes against property, low level fraud and drug-related cases although there is emerging risk related to cybercrime (internet scam, possible romance and other foreign scams). The external threat mainly emanates from proceeds of crime derived from predicate offenses namely fraud and tax crimes committed outside Samoa. Although there is a lack of definitive evidence, the misuse of Samoa's international financial services sector to facilitate ML has been identified and highlighted in the ML/TF typology reports.

On sectoral ML threat, commercial banks, money transfer operators (MTOs), trust and company service providers (TCSPs) and casinos are identified as the most prevalent venues used by criminals to launder criminal proceeds warranting **HIGH** ratings, respectively. International financial services sector of Samoa has also been assessed as posing **HIGH** money laundering threat to Samoa due to its inherent nature and recent typology reports, where funds are highlighted to be moved through the international financial services sector in Samoa.

The overall national ML vulnerability of Samoa is assessed as **MEDIUM.** This rating is influenced by an overall national combatting ability which is rated **MEDIUM** as a result of the identified gaps that are still needs to be addressed in order to strengthen Samoa's overall AML/CFT regime, including enhancing its AML/CFT legal framework to ensure its effective compliance with the international AML/CFT standards, building strong public-private sector partnerships, improving capacity (human and technical) and capability for ML investigations, prosecutions and convictions, and strengthening external and international cooperation.

The second factor influencing the overall national ML vulnerability rating was the overall sector vulnerability which was rated **MEDIUM**. This rating is due to a **HIGH** ML vulnerability rating in commercial banking, MTOs, TCSPs and casinos sectors, a **MEDIUM** vulnerability rating in the insurance sector, lawyers, and accountancy sector, and a **LOW** ML vulnerability rating for money lenders, credit unions, dealers in precious metals and stones, real estate agents and non-profit organisations (NPOs), respectively. Despite the recent efforts to strengthen the legal and regulatory framework and mechanisms to ensure the transparency of beneficial ownership, the ML vulnerability of Samoa's international financial services sector is assessed as **HIGH** due to the inherent high risk of them being abused by criminals to set up complex structures for illegal purposes such as move and conceal illicit funds and to hide their identities. The vulnerability of the domestic legal entities and arrangements of Samoa is assessed as **MEDIUM**, considering significant deficiencies in the legal and regulatory framework to ensure the transparency of their beneficial ownership, as required by the FATF standards.

The table below summarises the final ML risk ratings for various sectors.

SECTORS	NRA 2024
Banks	HIGH
Money Transfers Operators (MTOs)	HIGH
Insurance Sector	MEDIUM
Money Lenders	MEDIUM-LOW
Credit Unions	MEDIUM-LOW
Lawyers	MEDIUM
Accountants	MEDIUM
Casinos	HIGH
Dealers in Precious Metals and Precious Stones	MEDIUM-LOW
Trust and Company Service Providers (TCSPs)	HIGH
Real Estate Agents	MEDIUM-LOW
NPOs	MEDIUM-LOW
International Financial Services Sector	HIGH

Domestic Companies	MEDIUM

On TF risk, the NRA assessed that Samoa is exposed to **LOW** level of TF risk, with threat and vulnerability both rated as **LOW**. The **LOW** TF threat is due to various reasons. There have been no confirmed cases of TF in Samoa. High-risk patterns commonly associated with TF such as abuse of NPOs or physical movement of large quantities of cash or negotiable instruments across boundaries are not observed in Samoa. Despite low TF threat, the popularity of Samoa as an international (offshore) financial services sector, as well as the global and regional TF landscape, Samoa could be vulnerable to TF abuse and therefore TF threat to Samoa cannot be completely ruled out and must be constantly monitored with vigilance. Samoa has a sound framework in general to counter the financing of terrorism. Nonetheless, the NRA has identified gaps in the fulfilment of the relevant United Nations Security Council Resolutions ("UNSCR") and in ensuring effective compliance with FATF recommendations on combating TF.

Overall, the NRA has identified a number of recurring gaps that impeded the ability of Samoa to effectively combat ML and TF:

- Limited resources and skills to efficiently investigating and prosecuting ML and TF;
- Limited or lack of effective AML/CFT supervision of certain FIs and DNFBPs;
- Lack of availability of the relevant AML/CFT statistics required for the purposes of NRA; and
- Limited cooperation between public and private sector stakeholders on fighting ML/TF.

The NRA has identified six areas in which action is needed to strengthen the AML/CFT regime of Samoa:

- Enhance the AML/CFT legal and regulatory framework of Samoa to ensure its effective compliance with the FATF standards.
- Enhance the resources, capabilities, and skills of law enforcement authorities (LEAs) and FIU to effectively detect, investigate and prosecute ML and TF cases.
- Address the inconsistencies and gaps identified in applying the risk based AMLC/CFT supervisory regime.
- Improve information sharing between law enforcement agencies, the private sector and supervisors, building on the progress already made.
- Fill intelligence gaps, particularly those associated with money laundering through international financial services sector, DNFBPs and NPOs.
- Work with supervisors to improve individuals' and reporting entities' knowledge of ML and TF risks in key parts of the supervised sector to help them avoid being exploited by criminals and terrorists.

The Strategy specifies a range of action measures and a comprehensive set of activities, which all relevant institutions are obliged to perform to address the identified gaps and deficiencies in improving the AML/CFT system and regime of Samoa. The final goal is to increase the efficiency level of the system for prevention of ML and TF in the country.

The National Coordination Committee will monitor the implementation of this Strategy. An update to the National Risk Assessment will be conducted in 2025.

Overall High-level Objective

The National Strategy provides a framework and defines the priorities to enable the Government of Samoa to take a systematic approach towards achieving a high-level objective or vision.

OVERALL HIGH-LEVEL OBJECTIVE

Maintain an internationally compliant and effective AML/CFT regime that ensures the financial systems and the broader economy of Samoa is protected from the threats of money laundering and terrorist financing, thereby strengthening financial sector integrity and contributing to safety and security.

The integrity of the country's financial system is essential for economic and social development. However, crimes and the laundering of criminal proceeds undermines not only financial integrity but also good governance, financial sector stability and economic development. As such, Samoa is committed to implement a unified and cohesive strategy that would support a robust AML/CFT system. At the core of this strategy is compliance with international AML/CFT standards as this promotes financial integrity and supports the fight against crimes.

To attain this over-all high-level objective, the Government of Samoa is undertaking a clearly defined mission.

THE MISSION STATEMENT

Combating money laundering, its predicate offenses, terrorism and terrorism financing by strengthening the AML/CFT legal framework, establishing a strong coordination and cooperation mechanism, intelligence sharing and enforcement efforts among relevant competent authorities and carrying out effective supervision and preventive measures in line with international standards, and increasing society's AML/CFT awareness and support.

The strategy provides a multi-faceted approach in combating ML, its predicate offenses, terrorism and TF. A strong legal framework is key to a robust AML/CFT system. Collaboration of key government agencies, particularly of the Samoa's financial intelligence unit (SFIU), law enforcement authorities (LEAs) and prosecutors, is also an essential component of the strategy. The quality of financial intelligence is also hinged in the effective supervision over, and proper implementation of preventive measures, by supervised entities. Finally, due to the impact of ML and TF to the economy and public order, it is crucial that key government agencies and the public are made aware of the threats of ML and TF, and the vulnerabilities of the country's AML/CFT system.

Strategic Themes

The overall high-level objective will be achieved through four main strategic themes, which are as follows:

- **Strategic Theme 1**: Mitigate money laundering and terrorist financing risk through continuous improvement of the strategic, legislative and institutional framework, coordination and cooperation of all AML/CFT stakeholders and international cooperation.
- **Strategic Theme 2:** Prevent suspected proceeds of crime and funds intended for terrorism from entering the financial and non-financial sectors or improve their detection and reporting by these sectors.
- **Strategic Theme 3:** Detect and disrupt money laundering threats while ensuring that criminals are sanctioned and deprived of illicit proceeds.
- **Strategic Theme 4:** Detect and disrupt terrorism financing threats while ensure that terrorists are deprived of resources and terrorist financiers are adequately sanctioned.

Under each strategic theme, there are a set of defined strategic objectives (as detailed in the section below), the achievement of which will lead towards the achievement of the over-all high-level objective of this Strategy.

Strategic Objectives

Building on the insights from the NRA and the MER 2015, the National Strategy has identified 11 strategic objectives which are divided among four Strategic Themes. The over-all high-level objective of this National AML/CFT Strategy will be achieved by achieving these 11 strategic objectives, defined action measures and activities prescribed in the Action Plan, which is a part of this Strategy (Annex I).

Strategic Themes	Strategic Objectives
Mitigate money laundering and terrorist financing risk through continuous improvement of the strategic, legislative and institutional framework, coordination and cooperation of all AML/CFT stakeholders and international cooperation.	1. Maintaining and improving a comprehensive understanding of money laundering and terrorist financing risks in Samoa. 2. Strengthening the national AML/CFT legal and regulatory framework to ensure its compliance with the international AML/CFT standards and to effectively mitigating money laundering and terrorism financing risks**.** 3. Strengthening national cooperation, coordination and information sharing mechanisms between the relevant competent authorities, as well as with the private sector. 4. Enhancing international cooperation to ensure appropriate information, financial intelligence and evidence is delivers to facilitate action against criminals and their assets.

Prevent suspected proceeds of crime and funds intended for terrorism from entering the financial and non-financial sectors or improve their detection and reporting by these sectors.	5. Strengthening the risk-based AML/CFT supervision of the financial sector and DNFBPs to ensure their compliance with the AML/CFT obligations is commensurate with their risks. 6. Strengthening the implementation of AML/CFT measures, and the quality of suspicious activity reports submitted by FIs and DNFBPs to the SFIU. 7. Enhancing transparency of beneficial ownership of legal persons and legal arrangements.
Detect and disrupt money laundering threats while ensuring that criminals are sanctioned and deprived of illicit proceeds.	8. Strengthening the law enforcement efforts and intelligence capability to effectively detect, process and properly sanction the perpetrators of ML and ensuring that illegal proceeds are confiscated. 9. Developing and implementing he AML/CFT data collection processes and mechanisms.
Detect and disrupt terrorism financing threats while ensure that terrorists are deprived of resources and terrorist financiers are adequately sanctioned.	10. Improvement and efficient implementation of the legislative framework governing the prevention of terrorist financing and increased efficiency in detecting, processing and properly sanctioning the perpetrators of terrorist financing. 11. Improving the framework for preventing the abuse of the NPO sector for terrorist financing, through active cooperation between the public and NPO sectors

Strategic Objective 1

Recommendation 1 of the 2012 FATF Recommendations and the FATF Methodology 2013 requires countries to not only identify and assess the ML/TF risks facing the country but also to keep the risk assessments up-to-date and to adopt mechanisms to provide information on the results of the risk assessments to all relevant competent authorities and self-regulatory bodies (SRBs), FIs and DNFBPs.

One of the deficiencies noted in the 2015 MER of Samoa is the lack of sufficient sharing of the 2012 NRA of Samoa with the private sector and the implementation of a comprehensive risk-based approach to allocating resources and implementing measures to prevent or mitigate ML/TF.

The third NRA of Samoa has recently been adopted by the Government of Samoa on May 2024. The first objective of the Strategy is thus to promote a good understanding of ML and TF risks facing Samoa, as identified in the NRA, and to continue its efforts to identify any emerging ML/TF threats and vulnerabilities. One of the priority areas identified in the NRA in which Samoa should take immediate action is to conduct the national-level ML/TF risk assessment of VAs and VASPs to understand the ML/TF risks associated with this sector and to apply a risk-based approach to mitigate the identified risk accordingly.

STRATEGIC OBJECTIVE 1 Maintaining and improving comprehensive understanding of money laundering and terrorist financing risks in Samoa	
Expected Results	**Measures of Success**
FIs, DNFBPs, relevant competent authorities and all supervisory and regulatory bodies, including the public, are aware of and understand the ML and TF risks identified in the NRA Continuity sustained in reviewing threats and vulnerabilities i.e., ongoing assessment of emerging ML/TF risks and vulnerabilities Update of the ML/FT NRA of Samoa in 2026	Published NRA report on the website of the SFIU Number of outreach activities relating to the findings of the NRA Publication of new trends and typology reports Published updated ML/TF NRA report within the specified time period Use of the NRA by the private sector and supervisors to inform their own risk assessments and prioritize their activities
Action Measures	
1. Ensure that all reporting entities, relevant competent authorities, supervisory and regulatory bodies are aware of the findings of the NRA and understand the ML/TF risks facing Samoa. 2. Continuously monitor the emerging ML/TF risks and publish relevant typologies and trends reports. 3. Conduct the national ML/TF risk assessment of virtual assets (VAs) and virtual asset service providers (VASPs). 4. Update the ML/TF NRA and the National AML/CFT Strategy after three years' time period in 2025.	

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Strategic Objective 2

Since the 2015 MER of Samoa, a lot of effort that has been put into enhancing Samoa's AML/CFT legal framework in order to address the deficiencies identified in the 2015 MER of Samoa. Samoa has reviewed and amended a number of its AML/CFT-related legislations, including Money Laundering Prevention Amendment Act 2018, Tax Administration Amendment Act 2012, Counter-Terrorism Act 2014, Trustee Companies Act 2017, Proceeds of Crime Act 2007 and Crimes Act 2013. Nonetheless, there are still a number of deficiencies identified in the NRA, as well as the 2015 MER of Samoa, that relate to procedural and policy requirements which are yet to be addressed by Samoa. Samoa shall continue to work in strengthening its AML/CFT regime to comply with the international standards.

STRATEGIC OBJECTIVE 2 Strengthening the national AML/CFT legal and regulatory framework of Samoa to ensure its compliance with the international AML/CFT standards and to effectively mitigate money laundering and terrorism financing risks.	
Expected Results	**Measures of Success**
Legal and Regulatory AML/CFT framework is in compliance with the international AML/CFT Framework	Successful amendments to the relevant laws and regulations Successful amendments to by-laws and regulations Enactment of new legislation and regulations, where required. Updated guidance and, where required, issuance of new AML/CFT-related guidance to FIs, DNFBPs and the NPOs sector
Action Measures	
1. Conduct a legal gap analysis of existing AML/CFT legal and regulatory framework and undertake necessary measures to ensure compliance with the international AML/CFT standards. 2. Review and update existing guidance and to issue new AML/CFT guidance and procedures, where required, to FIs, DNFBPs and NPOs.	

Strategic Objective 3

The NRA has identified that overall Samoa has a good institutional basis for national co-operation and co-ordination, but effectiveness needs to be improved at both strategic and operational levels, especially the frequent and timely exchange of information between the competent authorities within and outside the working groups to ensure optimum outcomes in the AML/CFT operational matters. The MER 2015 has also identified the need to improve the level of dissemination of financial intelligence to, and co-operation with, law enforcement, to conduct strategic analysis. More co-ordination and cooperation is need between authorities to pursue ML investigations, in particular for more serious offences and/or third-party ML. Deficiencies have also been identified in the coordination and cooperation mechanisms between the relevant authorities relating to cross-border declarations of currency or Bearer Negotiable Instruments, which needs to be improved.

The NRA has made a recommendation to enhance partnerships with the private sector, and to engage the private sector stakeholders in the fight against ML and TF through intelligence development and sharing. Public-private partnerships enhance the overall capability of Samoa to combat ML and TF.

At the same time, it has also been identified that a proper mechanism and system should be established at national level to ensure the effective implementation and monitoring of this Strategy and its Action Plan to achieve the agreed objectives. This is also one of the requirements under FATF Recommendations 2.

STRATEGIC OBJECTIVE 3 Strengthening national cooperation, coordination and information sharing mechanisms between the relevant competent authorities, as well as with the private sector stakeholders	
Expected Results	**Measures of Success**
Established system and mechanism to ensure the effective implementation and monitoring of this Strategy and its Action Plan	Annual progress reports published by the national coordination committee (NCC) on the effective implementation of this Strategy
Action measures and activities, as provided in this Strategy, to effectively mitigate the ML/TF risks identified in the NRA are implemented	Final report published by the NCC on the successful implementation of action measures and activities identified in this Strategy
Number and quality of AML/CFT information sharing requests and dissemination increases	Statistics on number of requests and disseminations by the SFIU Qualitative assessment of usefulness of information shared (e.g., through feedback mechanism)
Shared information contributed to successful identification of cases	Percentage of cases involving shared information

	Qualitative assessment of importance of shared information to cases (e.g., through reporting or sampling of cases)

Action Measures
1. Establish a NCC, with sufficient powers and resources, to ensure the effective implementation and monitoring of this Strategy.   2. Improve information sharing between the relevant competent authorities, even outside the MLP Task Force, for improved coordination and cooperation at operational level.   3. Strengthening cooperation between the relevant authorities for successful investigation and prosecution of ML and TF cases.   4. Develop arrangements and maximize existing coordination mechanisms to enforce cross-border declarations and to combat physical smuggling of cash.   5. Establish public-private partnerships and platforms that serves as a think tank and forum for public/private sector dialogue on issues pertaining to ML and TF.

Strategic Objective 4

The NRA has assessed that overall Samoa has put in place and uses a wide range of mechanism to provide international cooperation, including mutual legal assistance (MLA), financial intelligence exchange, and cooperation among LEAs and financial regulators with their foreign counterparts. Nonetheless, it has been identified that international cooperation needs to be further strengthened in certain areas. Some of the gaps identified in the NRA relates to the capacity of the relevant agencies (including LEAs) to identify and initiate requests for international cooperation, lack of information in MLA requests on the amount of illicit funds involved in predicate offences originating from abroad, lack of sufficient relevant information regarding informal international cooperation, and lack of records on timeliness for processing requests. Knowledge and skills may be acquired and/or enhanced with the assistance of international partners.

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<td colspan="2">STRATEGIC OBJECTIVE 4

Enhancing regional and international cooperation to ensure appropriate information, financial intelligence and evidence is delivered to facilitate action against criminals and their assets.</td>
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<td>Expected Results</td>
<td>Measures of Success</td>
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<tr>
<td>Timely and efficient provision of information on perpetrators of money laundering and terrorist financing and illegally acquired property within the international cooperation</td>
<td>Annual report (with detailed information, including information on time needed to prepare a response, quality of the prepared response etc.) on realized international cooperation i.e., exchanged information on perpetrators of money laundering and financing of terrorism</td>
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<td colspan="2">Action Measures</td>
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1. Enhance the existing legal framework and arrangements to handle international cooperation including mutual legal assistance, extradition, intelligence and asset recovery.
2. Develop and implement an international coordination framework for each supervisory authority.
3. Strengthen and formalize procedures and coordination with regards to sending and responding to MLA requests.
4. Ensure that the relevant agencies have adequate resources and capacity to deal expeditiously with exchange of information and MLA requests.

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Strategic Objective 5

The 2015 MER of Samoa has noted the lack of comprehensive risk-based approach to supervision as one of the major deficiencies in the AML/CFT regime of Samoa. The NRA has also identified major deficiencies in the AML/CFT supervision and monitoring of the regulated sectors in Samoa, including FIs, DNFBPs and NPOs. Some of the regulated sectors have inadequate or no AML/CFT supervision at all. Supervision of DNFBPs is not performed on a risk-sensitive basis, nor the risk-based approach is used to assess the adequacy of the internal AML/CFT controls, policies and procedures. Supervisors do not have any formal mechanisms to regularly identify, assess and update the ML/TF risks of the FIs and DNFBPs sectors they supervise, apart from the NRAs, which is particularly relevant in case of any major events or changes to a particular financial institution or sector. DNFBPs, other than TCSPs, are also not subject to systems for monitoring compliance with the AML/CFT requirements. The application of the 'fit and proper' requirements for licensing and registration in the case of both FIs and DNFBPs also needs to be strengthened.

STRATEGIC OBJECTIVE 5	
Strengthening the risk-based AML/CFT supervision of the financial sector and DNFBPs to ensure their compliance with the AML/CFT obligations commensurate with their risks.	
Expected Results	**Measures of Success**
Improved risk-based AML/CFT supervision of FIs and DNFBPs	Annual sublimated report (with thorough statistics) on AML/CFT supervision by all supervisory authorities. Published sectoral ML/TF risk assessment reports. Enactment and/or revision of regulations on establishment, licensing and registration of FIs and DNFBPs.
Action Measures	
- Establish and maintain a risk-based supervisory framework for FIs and DNFBPs consistent with relevant international standards and effective for preventing and deterring ML/TF. - Conduct sector-specific risk-based assessments across all financial and DNFBPs sectors, where the risk warrants this approach. - Enhance the risk-based supervision of the DNFBPs sector. - Promote cooperation and coordination among AML/CFT supervisory authorities. - Strengthening AML/CFT supervisory capacities and skills. - Develop and implement proper 'fit and proper' requirements for FIs and DNFBPs, including extending it to beneficial owners.	

Strategic Objective 6

The NRA has identified lot of gaps in the implementation of the AML/CFT measures by the FIs and DNFBPs, including the inadequate application of the CDD measures, record-keeping, internal controls and procedures, as well as low level submission or non-submission of suspicious activity report (STRs) by some sectors to the SFIU. It has also been identified that the SFIU provides either no or inadequate feedback to the supervised entities on their submitted STRs. Conducting outreach activities and AML/CFT trainings of both the FIs and DNFBPs is one of the recommended actions by the NRA. A number of deficiencies have been identified in the implementation of the AML/CFT measures by the reporting entities in the MER 2015 of Samoa and the 2nd Enhanced Follow-Up Report of Samoa 2018, which are yet to be addressed. Consequently, enhancing the implementation of the AML/CFT measures by the reporting entities and submission of quality STRs has been agreed as one of the objectives of this Strategy.

STRATEGIC OBJECTIVE 6	
Strengthening the implementation of AML/CFT measures, and the quality of suspicious activity reports submitted by FIs and DNFBPs to the SFIU.	
Expected Results	**Measures of Success**
Increased efficiency of measures to detect and prevent ML and TF. Increased quantity and enhanced quality of STRs.	Published updated and/or new guidance on application of AML/CFT measures, including on suspicious indicators for FIs and DNFBPs Annual report and statistics on received and analysed STRs
Action Measures	
- FIs and DNFBPs adopt and implement adequate measures and actions to detect ML/TF risks in accordance with their determined risks and risk profile. - Increased supervisory outreach to industry on AML/CFT obligations (e.g., sectoral guidance, conferences, training). - Improved quantity and quality of STRs.	

Strategic Objective 7

The NRA has noted that although a lot of effort has been made in the past to enhance the transparency of beneficial ownership of international financial services sector, there is still a need to further strengthen the legal, regulatory and technical framework, both for the international financial services sector and domestic legal persons and arrangements, to ensure that 'adequate, accurate and up-to-date' information on beneficial owners of legal persons and legal arrangements is accessible and available in a timely manner.

STRATEGIC OBJECTIVE 7	
Enhancing transparency of legal persons and legal arrangements	
Expected Results	**Measures of Success**
Information on basic and beneficial ownership of legal persons and legal arrangements is readily available and accessible to the competent authorities	Establishing electronic register containing basic and beneficial ownership information of domestic legal persons and legal arrangements
	Effective use of BO register on international financial services sector by the competent authorities and reporting entities
BO register contain adequate, accurate and up-to-date information on beneficial owners of legal persons and legal arrangements	Statistics on entities that have updated their BO data on the register
Action Measures	

- Undertake a comprehensive assessment of ML/TF risks associated with legal persons and legal arrangements in Samoa, including international financial services sector.
- Strengthen the legal and regulatory framework on the transparency of beneficial ownership (BO) for both domestic legal persons and arrangements and international financial services sector ensuring compliance with the international AML/CFT standards.
- Strengthen the existing mechanisms to ensure that adequate, accurate and up-to-date BO information on entities within the international financial services sector is available to competent authorities in a timely manner.
- Establish BO database for domestic legal persons and legal arrangements.

Strategic Objective 8

The NRA has identified lack of ML investigations, prosecutions and convictions in Samoa. A concern in this regard has also been highlighted by the 2015 MER of Samoa. Lack of ML prosecutions and convictions in Samoa have been recognized due to various factors, including the lack of available resources and technical capacity of the relevant authorities to conduct ML investigations, prosecutions and convictions as well as lack of practical operational cooperation and exchange of information. The 2015 MER of Samoa has recommended, as a priority action, for Samoa to undertake ML investigations as a matter of policy, particularly (but not only) in relation to more serious proceeds-generating offences and third-party money laundering, when they occur. Lack of ML prosecutions of self-launderers and professional launderers has been identified as an intelligence gap. Similarly, the NRA has identified no cases where illegal proceeds are either seized, frozen or confiscated or an action has been initiated to seize, freeze or confiscate the proceeds of crime, by the relevant Samoan authorities relating to predicate offences, including those from international offending – the process which need to be established and improved. Lack of confiscation action in more serious/complex cases has also been identified as a gap in the AML/CFT regime of Samoa by the MER 2015.

STRATEGIC OBJECTIVE 8	
Strengthening the law enforcement efforts and intelligence capability to effectively detect, process and properly sanction the perpetrators of ML and ensuring that illegal proceeds are confiscated	
Expected Results	**Measures of Success**
Increased number of detected and documented cases of money laundering	Annual report and statistics on detected and processed cases of money laundering.
Increased number of processed cases of money laundering	Annual report and statistics on the reports and notifications submitted by the FIU to the competent prosecution authorities.
Increased number of properly sanctioned perpetrators of money laundering	
The property subject to confiscation is timely identified and secured	Published annual report and statistics on frozen assets, seized and confiscated property in cases of money laundering.
Effective management of seized and confiscated property	
Action Measures	
1. Enhance the capacity and capabilities of the SFIU and other LEAs to efficiently investigate and prosecute ML/TF cases. 2. Strengthen the capacities of the SFIU for making tactical and strategic analysis. 3. Strengthen the capacities of the SFIU for operational analysis. 4. Strengthen the knowledge, skills and capacities of LEAs in conducting parallel financial investigations. 5. Strengthen the knowledge and capacities of prosecutors and judges on prosecuting and adjudicating ML/TF cases 6. Establish and ensure the effective implementation of systems and mechanisms for freezing, seizing and confiscating illegal assets.	

Strategic Objective 9

The NRA identified a range of predicate offences and high-risk sectors for ML and TF. Nonetheless, there is lack of sufficient information and data, in particular statistics on the value of illicit proceeds associated with predicate offences. Quantification of the value of domestic and foreign proceeds of crime in Samoa, and the type and extent of threats associated with the range of predicate offences, is a priority identified in the NRA for Samoan authorities to be able to direct AML/CTF resources so as to have the greatest impact.

The total value of funds laundered through the Samoan financial system is an intelligence gap that the Samoan authorities acknowledge. Similarly, the various proportions of these funds laundered through the financial entities, banks, casino, lawyers, real estate agents, MTOs, high value goods dealers and the like is an intelligence a gap that is yet to be addressed.

STRATEGIC OBJECTIVE 9	
Developing and implementing an effective AML/CFT data collection system	
Expected Results	**Measures of Success**
Availability of comprehensive and complete statistics on predicate offences, including ML and TF offences, and the proceeds of crime involved under each offense.	Annual report on predicate offences, including ML and TF, and the funds involved under each predicate offence.
Action Measures	
1. Establish a central database for the collection and maintenance of AML/CFT data and statistics. 2. Set up governance and infrastructure. 3. Agree on information sharing approach. 4. Enhance the capabilities and capacities of all the relevant agencies to meet the AML/CFT data collection and sharing requirements.	

Strategic Objective 10

Since the 2015 MER, Samoa has introduced a number of amendments to enhance its legal and regulatory framework governing the prevention of terrorist financing and to address the deficiencies identified in the MER 2015.Nonetheless, there are a number of deficiencies identified in the NRA, as well as the 2015 MER of Samoa, that are still remaining to be addressed by Samoa. These include, for instance, effective adoption and implementation of UNSC Resolutions, legal framework for implementation of TFS relating to proliferation financing, strengthening capacities and capabilities of relevant competent authorities to effectively detect and process TF cases, as well as to provide more guidance and training to enhance the capacities FIs and DNFBPs to effectively detect and prevent TF risks.

STRATEGIC OBJECTIVE 10	
Improvement and efficient implementation of the legislative framework governing the prevention of terrorist financing and increased efficiency in detecting, processing and properly sanctioning the perpetrators of terrorist financing	
Expected Results	**Measures of Success**
Strengthened legal and regulatory framework governing the prevention of TF in compliance with the FATF Recommendations 2012.	Successful enactment and amendment of relevant laws and regulations, where required, to prevent terrorist financing Published updated guidance and, where required, issuance of new TF related guidance to FIs and DNFBPs
Increased awareness of the risks of TF	Statistics on detected and processed cases of TF.
Efficient detection, prosecution and proper sanctioning of the perpetrators of TF	
Action Measures	
1. Conduct a legal gap analysis of existing legal and regulatory framework on terrorism and TF and undertake necessary measures to ensure compliance with the international standards. 2. Adopt the necessary legal and regulatory framework and take effective measures to implement the UNSCRs. 3. Enact legislation and related bye-laws for implementation of TFS relating to proliferation financing. 4. Strengthen the capacity for detection and processing of TF cases. 5. Raise awareness and provide more guidance to FIs and DNFBPs on detecting and processing TF risks.	

Strategic Objective 11

The NRA has identified limited engagement of the supervisory and regulatory authorities i.e., the MCIL and the SFIU, with the NPO sector to educate, train and strengthen NPOs awareness in relation to AML/CFT matters. As identified by the NRA and the 2015 MER of Samoa, a comprehensive risk assessment of the NPO sector needs to be conducted, identifying the NPOs that satisfy the definition of 'NPOs' under the FATF Recommendation 8 and those that are considered to be higher risk. There is a lack of targeted risk-based AML/CFT supervision of the NPO sector by the relevant authorities, including the lack of relevant statistics and information on NPOs and their activities, inadequate annual reporting requirements, inadequate monitoring of registration and inadequate penalties for breaches of the applicable law.

STRATEGIC OBJECTIVE 11	
Improving the framework for preventing the abuse of the NPO sector for terrorist financing, through active cooperation between the public and NPO sectors	
Expected Results	**Measures of Success**
Implementation of the risk-based AML/CFT supervision of the NPO sector	Annual sublimated report (with thorough statistics) on AML/CFT supervision by all supervisory authorities

Identification of NPOs that satisfy the FATF definition of NPOs

Identification of NPOs that are at risk of TF abuse |
| Increased awareness of the competent authorities, FIs, DNFBPs and the NPO sector about TF risks | Published TF risk assessment of the NPO sector

Statistics on NPOs and their activities are documented and available |
Established internal controls and procedures among NPOs to detect and deter TF risks	Documented codes of conduct on transparency and accountability, internal AML/CFT risk assessments, controls, policies and procedures by NPOs.
Action Measures	
1. Ensure that the legal and regulatory framework to regulate the NPO sector in Samoa is adequate and effective.	

2. Conduct comprehensive TF risk assessment of the NPO sector, identifying subset of NPOs that satisfy the FATF definition of NPOs under Recommendation 8 and that are at a high risk of abuse for TF.
3. Establish and maintain a risk-based supervisory framework for non-profit organizations consistent with relevant international standards and effective for preventing and deterring TF activities.
4. Enhance outreach activities promoting NPOs awareness on TF risks and to enhance their capacities to effectively detect and prevent their misuse for TF.

Implementation and Review of the National AML/CFT Strategy

A National AML/CFT Coordinating Committee (NCC) shall be established to ensure the effective implementation and monitoring of the National AML/CFT Strategy 2023-2026. Key government agencies and those who participated in the drafting of the National Strategy shall be part of the national coordinating body. These agencies shall have the responsibility of implementing the action measures and activities within their areas of focus.

Within each action item, lead agency(ies) are identified with the primary responsibility of implementing and reporting on the required actions. Agencies which are likewise concerned with the outcome of the action item are identified to support its implementation. Timelines for implementation, as committed by the relevant agencies, are also provided. There remains, however, a broad responsibility for all AML/CFT public and private stakeholders to support and cooperate with the primary authorities in the implementation of the National Strategy.

A Secretariat will be formed, which shall be responsible for, among others, the coordination, logistics and operations of the meetings, and coordination with and monitoring of duties and responsibilities of the NCC.

The National AML/CFT Strategy is a dynamic document as ML/TF risks are constantly evolving and may change from time-to-time the National Strategy shall be subject to review and updated by the NCC after every three (3) years, or when circumstances so warrant, to keep it relevant.

Annex I: Action Plan of the National AML/CFT Strategy

Strategic Objective 1: Maintaining and improving a comprehensive understanding of money laundering and terrorist financing risks in Samoa

Action Measures:

1. Ensure that all reporting entities, relevant competent authorities, supervisory and regulatory bodies are aware of the findings of the NRA and understand the ML/TF risks facing Samoa,
2. Continuously monitor the emerging ML/TF risks and publish relevant typologies and trends reports.
3. Conduct the national ML/TF risk assessment of virtual assets (VAs) and virtual asset service providers (VASPs).
4. Update the ML/TF NRA and the National AML/CFT Strategy after three years' time period in 2026.

Action Measures	Activity	Lead Responsible Authority	Other Supporting Authorities	Deadline	Resources & Fiscal Implications
1. Ensure that all reporting entities, relevant competent authorities, supervisory and regulatory bodies are aware of the findings of the NRA and understand the ML/TF risks facing Samoa	1.1. Publication of the NRA report on the website of the SFIU	SFIU	-		No fiscal implications
	1.2. Conduct outreach activities to inform all FIs, DNFBPs, NPO, competent authorities, supervisory and regulatory bodies of the results and findings of the NRA	SFIU	All supervisory authorities		
2. Continuously monitor emerging ML/TF risks and publish relevant typologies and trends reports.	2.1. Publication of quarterly trends and typologies reports	MLP Task Force	All supervisory and competent authorities		No fiscal implications
3. Conduct the national ML/TF risk assessment of virtual assets (VAs) and virtual asset service providers (VASPs)	3.1. Develop a methodology to conduct the ML/TF risk assessment of VAs and VASPs	SFIU	Central Bank of Samoa and Ministry of Finance		No fiscal implications

	3.2. Adopt and publish the national ML/TF risk assessment of VAs and VASPs	SFIU	Central Bank of Samoa and Ministry of Finance		No fiscal implications
4. Update the ML/TF NRA and AML/CFT Strategy in three years' time in 2026	4.1. Undertake analysis of the third NRA process, especially challenges faced during the process and the issues identified as requiring further in-depth analysis	MLP Task Force	All supervisory and competent authorities		No fiscal implications
	4.2. Agree on the overall oversight and governance of the process, including establishing the NRA WG and execution plan	MLP Task Force	All supervisory and competent authorities		No fiscal implications
	4.3. Gather relevant data and stakeholder perspectives	MLP Task Force	All supervisory and competent authorities		No fiscal implications
	4.4. Draft the first NRA report, hold workshops with key stakeholders, incorporate feedback, finalise and publish the NRA report	MLP Task force	All supervisory and competent authorities		No fiscal implications

Strategic Objective 2: Strengthening the national AML/CFT legal and regulatory framework of Samoa to ensure its compliance with the international AML/CFT standards and to effectively mitigate money laundering and terrorism financing risks.

Action Measures:

1. Conduct a legal gap analysis of existing AML/CFT legal and regulatory framework and to undertake necessary measures to ensure compliance with the international AML/CFT standards.
2. Review and update existing guidance and to issue new AML/CFT guidance and procedures, where required, to FIs, DNFBPs and NPOs.

Action Measures	Activity	Lead Responsible Authority	Other Supporting Authorities	Deadline	Resources & Fiscal Implications
1. Conduct a legal gap analysis of existing AML/CFT legal and regulatory framework and to undertake necessary measures to ensure compliance with the international AML/CFT standards.	1.1. Conduct a legal review of the existing AML/CFT legal and regulatory framework to identify the remaining gaps and shortcomings *vis-à-vis* the FATF Standards	MLP Task Force	All supervisory and competent authorities		No fiscal implications
	1.2. Amend or enact new legislation, byelaws and/or regulations, as per the gap analysis report under 1.1. above	MLP Task Force	All supervisory and competent authorities		
2. Review and update existing guidance and to issue new AML/CFT guidance and procedures, where required, to FIs, DNFBPs and NPOs.	2.1. Conduct a review of the existing AML/CFT guidance and procedures to identify the need for any amendments or to propose the issuance of new guidance and procedures, based on the findings of the NRA and updated international standards	MLP Task Force	All supervisory and competent authorities		No fiscal implications
	2.2. Issue updated or new AML/CFT guidance and procedures, as identified under 2.1 above	MLP Task Force	All supervisory and competent authorities		No fiscal implications

Strategic Objective 3: Strengthening national cooperation, coordination and information sharing mechanisms between the relevant competent authorities, as well as with the private sector stakeholders

Action Measures:

1. Establish a national coordinating committee (NCC), with sufficient powers and resources, to ensure the effective implementation and monitoring of this Strategy
2. Improve information sharing between the relevant competent authorities, even outside the MLP Task Force, for improved coordination at operational level
3. Strengthening cooperation between the relevant authorities for successful investigation and prosecution of ML and TF cases
4. Develop arrangements and maximize existing coordination mechanisms to enforce cross-border declarations and to combat physical smuggling of cash
5. Establish public-private partnerships and platforms that serves as a think tank and forum for public/private sector dialogue on issues pertaining to ML and TF.

Action Measures	Activity	Lead Responsible Authority	Other Supporting Authorities	Deadline	Resources & Fiscal Implications
1. Establish a national coordinating committee (NCC), with sufficient powers and resources, to ensure the effective implementation and monitoring of this Strategy	1.1. Review and/or amend the legal framework to establish the NCC and design its governance and organizational structure	Ministry of Finance	SFIU		No fiscal implications
	1.2. Establish and operationalize a Secretariat to support the NCC, including deciding on its role, agreeing on priorities and workplan	Ministry of Finance	SFIU		
	1.3. Create a standard reporting process and format for all members of the NCC to report the implementation of action measures	Ministry of Finance	SFIU		

	1.4. Create NCC sub-committees in charge of specific areas, agree on set-up and composition	Ministry of Finance	SFIU		No fiscal implications
2. Improve information sharing between the relevant competent authorities, even outside the MLP Task Force, for improved coordination at operational level	2.1. Conduct a legal review of the existing information sharing mechanisms	SFIU	-		No fiscal implications
	2.2. Execution/updating of Memorandum of Understandings (MoUs) on AML/CFT between the relevant competent authorities	SFIU	All supervisory and competent authorities		No fiscal implications
	2.2. Establish infrastructure for requests and access to other sources of information/databases (i.e., information held by LEAs, government registries/database, identification documents etc.)	MLP Task Force	All supervisory and competent authorities		
	2.3. Provide IT systems and allocate sufficient resources (including staff) to timely process information sharing requests between national competent authorities.	Ministry of Finance	All supervisory and competent authorities		
	2.4. Train personnel for effective implementation of the relevant laws and mechanisms on information sharing	SFIU	All supervisory and competent authorities		
3. Strengthening cooperation between the relevant authorities for successful investigation and	3.1. Creation of joint task forces, committees, working groups for parallel and/or joint investigation and prosecution of ML and predicate offence	MLP Task force	All supervisory and competent authorities		No fiscal implications

prosecution of ML and TF cases	3.2. Develop tasking and coordination mechanisms between the competent authorities	MLP Task Force	All supervisory and competent authorities		No fiscal implications
	3.3. Carry out regular reviews on the effectiveness of working arrangements and take action on deficiencies found	MLP Task Force	All supervisory and competent authorities		
4. Develop arrangements and maximize existing coordination mechanisms to enforce cross-border declarations and to combat physical smuggling of cash	4.1. Establish/amend MoUs between the relevant competent authorities on sharing of information relating to cross-border declarations of currency or BNIs	Ministry of Customs and Revenue	SFIU, Immigration Division and Ministry of Prime Minister and Cabinet		No fiscal implications
	4.1. Provide adequate IT system (including appropriate software) for timely sharing of information between the Custom's authority, Immigration and the SFIU	Ministry of Customs and Revenue	SFIU, Immigration Division and Ministry of Prime Minister and Cabinet		
	4.2. Integrate Customs' and Immigration's databases on incoming passengers	Ministry of Customs and Revenue and Immigration Division	-		
	4.3. Establish mechanism for sharing of the relevant information by Customs with Transnational crime Unit (TCU) and Samoa Police	Ministry of Customs and Revenue	Ministry of Prime Minister and Cabinet		

5. Establish public-private partnerships and platforms that serves as a think tank and forum for public/private sector dialogue on issues pertaining to ML and TF.	5.1. Identify on the composition and scope of the public-private partnership, set out vision and strategic objectives, set out list of main activities to be carried out (e.g., tactical intelligence, developing typologies, strategic analysis etc.)	MLP Task Force	All supervisory and competent authorities		No fiscal implications
	5.2. Set up operating model and governance structure (e.g., composition of committees, working groups, expert groups, advisory groups)	MLP Task Force	All supervisory and competent authorities		No fiscal implications
	5.3. Draft MoUs, Terms of References, as well as agreements on knowledge/information sharing	MLP Task Force	All supervisory and competent authorities		No fiscal implications

Strategic Objective 4: Enhancing international cooperation to ensure appropriate information, financial intelligence and evidence is delivers to facilitate action against criminals and their assets.

Action Measures:

1. Enhance the existing legal framework and arrangements to handle international cooperation including mutual legal assistance, extradition, intelligence and asset recovery
2. Develop and implement an international coordination framework for each supervisory authority
3. Strengthen and formalize procedures and coordination with regards to sending and responding to MLA requests
4. Ensure that the relevant agencies have adequate resources and capacity to deal expeditiously with exchange of information and MLA requests

Action Measures	Activity	Lead Responsible Authority	Other Supporting Authorities	Deadline	Resources & Fiscal Implications

1. Enhance the existing legal framework and arrangements to handle international cooperation including mutual legal assistance, extradition, intelligence and asset recovery	1.1. Conduct a legal review of existing legal and regulatory framework to handle international cooperation	AGO	SFIU		No fiscal implications
	1.2. Introduce the necessary amendments to the relevant legislations and regulations to ensure that international requests are handled effectively	AGO	SFIU		No fiscal implications
	1.3. Ensure that adequate mechanisms and systems are put into place to record all the necessary information related to formal and informal international cooperation requests, both sent and received.	AGO	SFIU		
2. Develop and implement an international coordination framework for each supervisory authority	2.1. Define and implement policies and procedures to allow informal exchanges of information across supervisors of all sectors with international counterparts	AGO	All supervisory and competent authorities		No fiscal implications
	2.2. Define and formalize approach to group supervision	AGO	All supervisory and competent authorities		No fiscal implications
	2.3. Establish procedures to respond to international requests for information-gathering regarding NPOs suspected of TF abuse.	MCIL	SFIU and AGO		
3. Strengthen and formalize procedures and coordination with regards	3.1. Review current procedures to respond to MLA requests	AGO	All supervisory and competent authorities		No fiscal implications

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to sending and responding to MLA requests	3.2. Identify potential areas of improvement, as per 3.1 above.	AGO	All supervisory and competent authorities		No fiscal implications
	3.3. Formalise coordination on MLA procedures (including, for example, facilitating information exchange and coordination between AGO, Ministry of Police, SIFA and SFIU on actions required post-receipt of foreign MLA request, establishing feedback mechanism to foreign counterparts requesting MLA, issuing internal communication etc.)	AGO	All supervisory and competent authorities		
4. Ensure that the relevant agencies have adequate resources and capacity to deal expeditiously with exchange of information and MLA requests	4.1. Conduct a needs assessment to determine the resource requirements, including human and technical, by the relevant agencies to expeditiously deal with exchange of information and MLA requests	AGO	All supervisory and competent authorities		No fiscal implications
	4.2. Ensure the availability of any additional resources, as determined under 4.1., to the relevant agencies	Ministry of Finance	AGO and SFIU		
	4.3. Explore mechanisms, in consultation with the private sector, that would facilitate more rapid access to financial information and information on beneficial ownership of legal persons and legal arrangements	MLP Task Force	All supervisory authorities		

Action Measures	Activity	Lead Responsible Authority	Other Supporting Authorities		
4.4. Provide training to the relevant agencies' staff to efficiently and effectively handle international cooperation requests	MLP Task Force	AGO, SFIU and other supervisory and competent authorities			

Strategic Objective 5: Strengthening the risk-based AML/CFT supervision of the financial sector and DNFBPs to ensure their compliance with the AML/CFT obligations commensurate with their risks.

Action Measures:

1. Establish and maintain a risk-based supervisory framework for FIs and DNFBPs consistent with relevant international standards and effective for preventing and deterring ML/TF.
2. Conduct sector-specific risk-based assessments across all financial and DNFBPs sectors, where the risk warrants this approach.
3. Enhance the risk-based supervision of the DNFBPs sector.
4. Promote cooperation and coordination among AML/CFT supervisory authorities.
5. Strengthening AML/CFT supervisory capacities and skills.
6. Develop and implement proper 'fit and proper' requirements for FIs and DNFBPs, including extending it to beneficial owners.

Action Measures	Activity	Lead Responsible Authority	Other Supporting Authorities	Deadline	Resources & Fiscal Implications
1. Establish and maintain a risk-based supervisory framework for FIs and DNFBPs consistent with relevant international standards and effective for	1.1. Analyze and document the current supervisory framework, including any gaps identified for improvement	SFIU	SIFA, Gambling Casino Authority and MCIL		No fiscal implications
	1.2. Agree and define target supervisory set-up and develop an implementation plan	SFIU	SIFA, Gambling Casino Authority and MCIL		No fiscal implications

preventing and deterring ML/TF.	1.3. Develop clear and adequate methodologies and procedures for conducting off-site and on-site supervisions.	SFIU	SIFA, Gambling Casino Authority and MCIL		No fiscal implications
2. Conduct sector-specific risk-based assessments across all financial and DNFBPs sectors, where the risk warrants this approach.	2.1. Develop a methodology and conduct sector-specific AML/CFT risk assessments of FIs and DNFBPs, where identified.	SFIU	SIFA, Gambling Casino Authority and MCIL		No fiscal implications
	2.2. Develop a methodology for data collection and risk profiling of reporting entities in various sectors.	SFIU	SIFA, Gambling Casino Authority and MCIL		No fiscal implications
	2.3. Based on the findings of the risk assessment under 2.2 above, define targets (e.g., frequency, including off-site and on-site inspections, and intensity of supervisory inspections) and carry out capacity planning based on targets and overall capacity demand	SFIU	SIFA, Gambling Casino Authority and MCIL		No fiscal implications
	2.4. Establish process for more targeted thematic reviews across many supervised entities in a sector (e.g., CDD, risk assessment, transaction monitoring)	SFIU	SIFA, Gambling Casino Authority and MCIL		No fiscal implications
3. Enhance the risk-based supervision of the DNFBPs sector.	3.1. Develop and/or update manuals and procedures for implementing risk-based approach to supervision	SFIU	SIFA and Gambling Casino Authority		No fiscal implications

	3.2. Implement the risk-based supervision (on-site and off-site inspections) in accordance with 3.1 and 2.3 above.	SFIU	SIFA and Gambling Casino Authority		
	3.3. Develop and establish annual compliance reporting procedures and processes for reporting entities to have a sound understanding of their activities and operations, including any changes in their risk profile, to inform the risk-based approach to supervision	SFIU	SIFA and Gambling Casino Authority		
4. Promote cooperation and coordination among supervisory authorities in supervising reporting entities.	4.1. Establish procedures and systems to conduct joint supervisions	SFIU	SIFA, Gambling Casino Authority and MCIL		No fiscal implications
	4.2. Establish system and procedures to liaise with and update the SFIU on supervisory activities (off-site and on-site inspections) by supervisors on a quarterly basis, including submitting reports on the findings of on-site inspections	SFIU	SIFA, Gambling Casino Authority and MCIL		
5. Strengthening AML/CFT supervisory capacities and skills.	5.1. Conduct a detailed needs assessment (technical and human) of each supervisory authority on conducting risk-based AML/CFT supervision of FIs and DNFBPs	MLP Task Force	All supervisory authorities		

	5.2. Based on the findings of the needs assessment report, ensure the availability of the adequate resources, both human and technical, to the supervisory authorities.	MLP Task Force	All supervisory authorities		
	5.3. Conduct trainings of the staff of the supervisory authorities on conducting risk-based AML/CFT supervision	MLP Task Force	All supervisory authorities		
6. Develop and implement proper 'fit and proper' requirements for FIs and DNFBPs, including extending it to beneficial owners	6.1. Conduct a legal gap analysis or review of the current legislation/regulations on the licensing/registration requirements of various regulated sectors under the AML/CFT law of Samoa	SFIU	All supervisory and regulatory authorities		No fiscal implications
	6.2. Enact or amend, as appropriate, the adequate law and/or regulations requiring the licensing or registration of all covered persons (e.g., money lenders, real estate agents, dealers in precious metals and stones)	Ministry of Finance	All supervisory and regulatory authorities		No fiscal implications
	6.3. Set out the modus operandi for licensing/registration with supervisory and regulatory authorities or other relevant bodies	Ministry of Finance	All supervisory and regulatory authorities		No fiscal implications
	6.4. Develop and implement proper 'fit and proper' requirements for FIs and DNFBPs,	Ministry of Finance	All supervisory and regulatory authorities		

	including extending it to beneficial owners				
	6.5. Set out rules and regulations to ensure the maintenance of a complete and up-to-date register of reporting entities in each regulated sector by the designated authorities.	Ministry of Finance	All supervisory and regulatory authorities		No fiscal implications
	6.6. Implement AML/CFT training on requirements to obtain and maintain licensing/registration	MLP Task Force	All supervisory and regulatory authorities		

Strategic Objective 6: Strengthening the implementation of AML/CFT measures, and the quality of suspicious activity reports submitted by FIs and DNFBPs to the SFIU.

Action Measures:

1. FIs and DNFBPs adopt and implement adequate measures and actions to detect ML/TF risks in accordance with their determined risks and risk profile.
2. Increased supervisory outreach to industry on AML/CFT obligations (e.g., sectoral guidance, conferences, training)
3. Improved quantity and quality of STRs

Action Measures	Activity	Lead Responsible Authority	Other Supporting Authorities	Deadline	Resources & Fiscal Implications

1. FIs and DNFBPs adopt and implement adequate measures and actions to detect ML/TF risks in accordance with their determined risks.	1.1. Issuance of guidance and tools to supervised entities on conducting enterprise-wide ML/TF risk assessments	SFIU	SIFA, Gambling Casino Authority and MCIL		No fiscal implications
	1.2. Issue guidelines, and as a part of off-site and on-site inspections, ensure that FIs and DNFBPs maintain the necessary statistics required for assessing ML/TF risk.	SFIU	SIFA, Gambling Casino Authority and MCIL		
	1.3. Training of the reporting entities on conducting enterprise-wide risk assessments	SFIU	SIFA, Gambling Casino Authority and MCIL		
2. Increase supervisory outreach to industry on AML/CFT obligations (e.g., sectoral guidance, conferences, training)	2.1. Develop/update and publish sector-specific guidelines (manuals, tests, model situations from the practice, typologies etc.) for all regulated sectors on ensuring compliance with their AML/CFT obligations	MLP Task Force	All supervisory authorities		No fiscal implications
	2.2. In consultation with the industry associations and reporting entities, identify specific AML/CFT topics to issue written guidance and/or conduct trainings/seminars to strengthen AML/CFT capabilities of the reporting entities.	MLP Task Force	All supervisory authorities		No fiscal implications

	2.3. Develop and issue a guidance on identification and verification of beneficial ownership information.	SFIU	SIFA, Gambling Casino Authority and MCIL		No fiscal implications
	2.4. Develop and publish a relevant typologies report of most often used sophisticated schemes involving legal entities, with emphasis on cross-border aspects.	SFIU	SIFA, Gambling Casino Authority and MCIL		No fiscal implications
	2.5. Conduct regular trainings of all sectors on their AML/CFT obligations	SFIU	SIFA, Gambling Casino Authority and MCIL		
3. Improved quantity and quality of STRs	3.1. Develop/update and issue guidance to FIs and DNFBPs on STRs	SFIU	All supervisory authorities		No fiscal implications
	3.2. Develop/update and issue appropriate guidance on suspicious indicators for FIs and DNFBPs, based on the findings of the NRA	SFIU	All supervisory authorities		No fiscal implications
	3.3. Carry out a detailed analysis of STRs reports submitted by the reporting entities and based on the results of the analysis, train compliance staff of reporting entities on the content and quality of STRs, including writing and presenting case studies (e.g., examples meriting/not meriting submissions)	SFIU	All supervisory authorities		
	3.4. Establish mechanisms to inform reporting entities on actions taken with regards to	SFIU	-		

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	submitted STRs (e.g., police investigation ongoing, prosecution initiated etc.)				
	3.5. Collaborate with expert working group in public-private partnership to further strengthen STR feedback loop.	SFIU	-		

Action Measures:

1. Undertake a comprehensive assessment of ML/TF risks associated with legal persons and legal arrangements in Samoa, including international financial services sector.
2. Strengthen the legal and regulatory framework on the transparency of beneficial ownership (BO) of both domestic legal persons and arrangements and international financial services sector ensuring compliance with the international AML/CFT standards.
3. Strengthen the BO register established for international financial services sector to ensure that the registered BO data is adequate, accurate and up-to-date.
4. Establish BO database for domestic legal persons and legal arrangements.

Action Measures	Activity	Lead Responsible Authority	Other Supporting Authorities	Deadline	Resources & Fiscal Implications
1. Undertake a comprehensive assessment of ML/TF risks associated with legal persons and legal arrangements in Samoa.	1.1. Undertake a comprehensive ML/TF risk assessment of domestic legal entities and legal arrangements	MCIL	SFIU		No fiscal implications
	1.2. Undertake a comprehensive risk assessment of ML/TF risks associated with international financial services sector	SIFA	SFIU		No fiscal implications

2. Strengthen the legal and regulatory framework on the transparency of beneficial ownership (BO) of both domestic legal persons and arrangements and international financial sector ensuring compliance with the international AML/CFT standards	2.1. Conduct a legal gap analysis of the relevant law and regulations to determine their compliance with the international standards in ensuring the transparency of legal entities and arrangement in Samoa, including law and regulations governing international financial services sector	MCIL and SIFA	SFIU		No fiscal implications
	2.2. Amend the relevant law and regulations, as determined in 2.1 above, to address any gaps and deficiencies to promote compliance with international AML/CFT standards	MCIL and SIFA	SFIU		No fiscal implications
3. Strengthen the existing mechanisms to ensure that adequate, accurate and up-to-date BO information on entities within the international financial services sector is available to competent authorities in a timely manner.	3.1. Continue to conduct a regular review of the BO information collected and maintained by TCSPs to determine any gaps or shortcomings	SIFA	SFIU		No fiscal implications
	3.2. Take appropriate steps to ensure that the up-to-date BO information on all entities within the international financial services sector is properly collected and maintained (including issuing guidance, building capacity and skills)	SIFA	SFIU		

	3.3. Determine and apply appropriate measures and establish systems to ensure that the BO information is reported to SIFA at the time of establishment of entities within international financial services sector, including applying it to existing entities, and any change in information are updated in the system on regular basis by TCSPs (i.e., establishing BO database of international financial services sector)	SIFA	SFIU		
4. Establish BO database for domestic legal persons and legal arrangements;	4.1. Assess options for data incorporation (within existing database or new one), benefits, risks and costs, and set out implementation plan	MCIL	SFIU		
	4.2. Amend the relevant legislation and/or issue new regulations, as required, on BO data collection	MCIL	SFIU		No fiscal implications
	4.3. Implement the system for BO data collection	MCIL	SFIU		
	4.4. Establish processes and processes for effective data management and information sharing	MCIL	SFIU		
	4.5. Conduct outreach activities and communicate to legal persons and	MCIL	SFIU		

arrangement about new changes in BO information and its implications				

Strategic Objective 8: Strengthening the law enforcement efforts and intelligence capability to effectively detect, process and properly sanction the perpetrators of ML and ensuring that illegal proceeds are confiscated.

Action Measures:

1. Enhance the capacity and capabilities of the SFIU and other LEAs to efficiently investigate and prosecute ML/TF cases.
2. Strengthen the capacities of the SFIU for making tactical and strategic analysis.
3. Strengthen the capacities of the SFIU for operational analysis.
4. Strengthen the knowledge, skills and capacities of LEAs in conducting parallel financial investigations.
5. Strengthen the knowledge and capacities of prosecutors and judges on prosecuting and adjudicating ML/TF cases
6. Establish and ensure the effective implementation of systems and mechanisms for freezing, seizing and confiscating illegal assets.

Action Measures	Activity	Lead Responsible Authority	Other Supporting Authorities	Deadline	Resources & Fiscal Implications
1. Enhance the capacity and capabilities of the SFIU and other LEAs to efficiently investigate and prosecute ML/TF cases.	1.1. Carry out detailed needs assessment exercise to determine the necessary resource requirements, both human and technical, of the SFIU and other LEAs to investigate and prosecute ML/TF cases	Ministry of Finance	All supervisory and competent authorities		No fiscal implications
	1.2. Based on the findings of the needs assessment report, agree on the target number of required AML/CFT dedicated staff and other resources for the SFIU and other LEAs	Ministry of Finance	All supervisory and competent authorities		No fiscal implications

	1.3. Take necessary measures to ensure that the necessary resources (as determined in 1.2.) are made available to the SFIU and other LEAs	Ministry of Finance	All supervisory and competent authorities		
	1.4. Implement staff development strategy to enhance their skills, knowledge and specialization in the field of AML/CFT	All supervisory and competent authorities			
	1.5. Carry out targeted and topic-specific trainings of the SFIU and LEAs on AML/CFT	MLP Task Force	All supervisory and competent authorities		
2. Strengthen the capacities of the SFIU for making tactical and strategic analysis.	2.1. Review and finalize list of databases required for effective intelligence activities	MLP Task Force	All supervisory and competent authorities		No fiscal implications
	2.2. Liaise with competent authorities about information sharing	MLP Task Force	All supervisory and competent authorities		
	2.3. Amend law/regulations granting SFIU the access to the identified databases for intelligence purposes	Ministry of Finance	SFIU		No fiscal implications
	2.4. Set out and implement enhanced IT infrastructure and processes within the SFIU for effective and efficient data gathering and analysis	Ministry of Finance	SFIU		

	2.5. Train SFIU staff to effectively use new data sources	SFIU	Ministry of Finance		
3. Strengthen the capacities of the SFIU for operational analysis.	4.1. Enhance the existing STR collection ICT tool of SFIU to provide for automated filtering (e.g., risk scoring) and developing STR taxonomy to optimize ability to search	Ministry of Finance	SFIU		
	4.2. Enhance strategic and operational analysis with this enhanced and specialized analytical ICT tool	Ministry of Finance	SFIU		
	4.3. Update internal processes and policies	SFIU	Ministry of Finance		No fiscal implications
	4.4. Train FIU staff on the specialized analytical tool, procedures and processes	SFIU	Ministry of Finance		
5. Strengthen the knowledge, skills and capacities of LEAs in conducting parallel financial investigations.	4.1 Establish a policy, guidelines and practice of conducting parallel financial investigations by LEAs.	Ministry of Police, Prisons and Corrections	SFIU, Ministry of Prime Minister and Cabinet, AGO		
	4.2 Conduct training of LEAs in conducting parallel financial investigations and finding property acquired through illegal activities that can be confiscated.	Ministry of Police, Prisons and Corrections	SFIU, Ministry of Prime Minister and Cabinet, AGO		
5. Strengthen the knowledge and capacities of prosecutors and judges on	5.1 Conduct a needs assessment of the prosecutors and judges in prosecuting and adjudicating ML/TF cases	AGO	SFIU		

prosecuting and adjudicating ML/TF cases	5.2 Arrange and conduct trainings of prosecutors and judges on prosecuting and adjudicating ML/TF cases.	AGO	SFIU		
6. Establish and ensure the implementation of effective systems and mechanisms for freezing, seizing and confiscating illegal assets.	6.1 Establish policies and procedures to ensure effective coordination and cooperation between the relevant authorities for freezing, seizing and confiscating illegal assets.	AGO	SFIU, Ministry of Prime Minister and Cabinet, and Ministry of Police, prisons and Corrections		
	6.2 Provide training to the relevant authorities on freezing, seizing and confiscating illegal assets	AGO	SFIU, Ministry of Prime Minister and Cabinet, and Ministry of Police, prisons and Corrections		
	6.3 Establishing an asset management system on seizures and confiscations	AGO and Central Bank of Samoa	SFIU, Ministry of Prime Minister and Cabinet, and Ministry of Police, prisons and Corrections		
	6.4 Strengthening the capacities of the designated authority in efficient management of the confiscated property.	Central Bank of Samoa	AGO and SFIU		

Strategic Objective 9: Developing and implementing an effective AML/CFT data collection system

Action Measures:

1. Establish a central database for the collection and maintenance of AML/CFT data and statistics.
2. Set up governance and infrastructure.
3. Agree on information sharing approach.
4. Enhance the capabilities and capacities of all the relevant agencies to meet the AML/CFT data collection and sharing requirements.

Action Measures	Activity	Lead Responsible Authority	Other Supporting Authorities	Deadline	Resources & Fiscal Implications
1. Establish a central database for the collection and maintenance of AML/CFT data and statistics	1.1. Identify relevant authorities/agencies that should be made responsible for collection of AML/CFT-related statistical data	MLP Task Force	All competent authorities		No fiscal implications
	1.2. Carry out an in-depth review of the AML/CFT data collection processes of all the relevant agencies to determine the most effective manner in which such data should be collected and compiled to be made readily available	MLP Task Force	All competent authorities		No fiscal implications
	1.3. Agree on statistics/data points to be included	MLP Task Force	All competent authorities		No fiscal implications
2. Set up governance and infrastructure	2.1. Allocate responsibilities for build, maintenance, and updating of database	MLP Task Force	All competent authorities		
	2.2. Set-up IT infrastructure	SFIU	All competent authorities		

	2.3. Design regular reporting/management of information structure	SFIU	All competent authorities		
3. Agree on information sharing approach	3.1. Decide on list of competent authorities to receive access rights	MLP Task Force	All competent authorities		No fiscal implications
	3.2. Align on reports to be disseminated publicly	MLP Task Force	All competent authorities		No fiscal implications
	3.3. Implementation of a feedback system on utilization of information submitted by the relevant agencies (feedback).	MLP Task Force	All competent authorities		No fiscal implications
4. Enhance the capabilities and capacities of the competent authorities to meet the AML/CFT data collection and sharing requirements	4.1. Conduct a needs assessment of all the competent authorities to determine the required resources, both human and technical, to comply with the data collection, maintenance and sharing requirements	MLP Task Force	All competent authorities		No fiscal implications
	4.2. Ensure that the competent authorities have the identified resources, as determined under 4.1. to carry out their data collection, maintenance and sharing obligations	MLP Task Force	All supervisory and competent authorities		
	4.3. Conducting staff training of all competent authorities on data collection, maintenance and sharing, including the use of the IT based data collection system	MLP Task Force	SFIU		

	4.4. Designate contact points within all competent authorities for collecting and maintaining the relevant data	MLP Task Force	All competent authorities		No fiscal implications

Strategic Objective 10: Improvement and efficient implementation of the legislative framework governing the prevention of terrorist financing and increased efficiency in detecting, processing and properly sanctioning the perpetrators of terrorist financing.

Action Measures:

1. Conduct a legal gap analysis of existing legal and regulatory framework on terrorism and TF and undertake necessary measures to ensure compliance with the international standards.
2. Adopt the necessary legal and regulatory framework and take effective measures to implement the UNSCRs.
3. Enact legislation and related bye-laws for implementation of TFS relating to proliferation financing.
4. Strengthen the capacity for detection and processing of TF cases
5. Raise awareness and provide more guidance to FIs and DNFBPs on detecting and processing TF risks

Action Measures	Activity	Lead Responsible Authority	Other Supporting Authorities	Deadline	Resources & Fiscal Implications
1. Conduct a legal gap analysis of existing legal and regulatory framework on terrorism and TF and undertake necessary measures to ensure compliance with the international standards.	1.1. Conduct a legal review of the existing legal and regulatory framework on terrorism and TF to identify any gaps or shortcomings *vis-à-vis* international requirements.	MLP Task Force	All supervisory and competent authorities		No fiscal implications
	1.2. Amend or enact legislation, byelaws and/or regulations to address the gaps identified in section 1.1. above	Ministry of Finance	All supervisory and competent authorities		No fiscal implications

2. Adopt the necessary legal and regulatory framework and take effective measures to implement the UNSCRs	2.1. Enact legislation to support targeted financial sanctions (TFS) relating to terrorism.	MLP Task Force	SFIU, Ministry of Prime Minister and Cabinet		No fiscal implications
	2.2. Establish a clear mechanism by which a target for designation may be identified and the process to be followed.	MLP Task Force	SFIU, Ministry of Prime Minister and Cabinet		No fiscal implications
	2.3. Establish a legal framework to deal with cross-border designation requests under UNSCR 1373	MLP Task Force	SFIU, Ministry of Prime Minister and Cabinet		No fiscal implications
3. Establish legal framework for implementation of TFS relating to proliferation financing.	3.1. Conduct a legal review of the exiting law and regulations and propose the enactment of legislation on TFS relating to proliferation financing	MLP Task Force	All supervisory and competent authorities		
	3.2. Draft related bye-laws, procedures and guidance for the effective implementation of TFS relating to proliferation financing.	MLP Task Force	All supervisory and competent authorities		
4. Strengthen the capacity for detection and processing of TF cases	4.1. Establish a joint-working group/committee to investigate and prosecute TF cases	AGO	SFIU, Ministry of Prime Minister and Cabinet, and Ministry of Police, prisons and Corrections		

	4.2. Provide training to investigators and prosecutors to detect, investigate and prosecute TF cases	AGO	SFIU, Ministry of Prime Minister and Cabinet, and Ministry of Police, prisons and Corrections		
5. Raise awareness and provide more guidance to FIs and DNFBPs on detecting and processing TF risks	5.1. Issue updated or new guidance, policies and procedures to reporting entities focused on the identification and reporting of TF risks to SFIU, including suspicious TF indicators	SFIU	All supervisory authorities		
	5.2. Organize training, seminars or workshops for reporting entities focusing on TF risks, TF trends and typologies, as well as on the identification and reporting of TF risks	SFIU	All supervisory authorities		

Strategic Objective 11: Improving the framework for preventing the abuse of the NPO sector for terrorist financing, through active cooperation between the public and NPO sectors.

Action Measures:

1. Ensure that the legal and regulatory framework to regulate the NPO sector in Samoa is adequate and effective
2. Conduct comprehensive TF risk assessment of the NPO sector, identifying subset of NPOs that satisfy the FATF definition of NPOs under Recommendation 8 and that are at a high risk of abuse for TF.
3. Establish and maintain a risk-based supervisory framework for non-profit organizations consistent with relevant international standards and effective for preventing and deterring TF activities.
4. Enhance outreach activities promoting NPOs awareness on TF risks and to enhance their capacities to effectively detect and prevent their misuse for TF.

Action Measures	Activity	Lead Responsible Authority	Other Supporting Authorities	Deadline	Resources & Fiscal Implications
1. Ensure that the legal and regulatory framework to regulate the NPO sector in Samoa is adequate and effective	1.1. Conduct a legal review of the existing legal and regulatory framework governing NPOs in Samoa	MCIL	SFIU and Ministry of Finance		No fiscal implications
	1.2. Recommend and introduce necessary amendments to effectively regulate the NPO sector	MCIL	SFIU and Ministry of Finance		No fiscal implications
	1.3. Issue policies to promote transparency, integrity and public confidence in the administration and managing of all NPOs	MCIL	SFIU and Ministry of Finance		No fiscal implications
	1.4. Establish systems and procedures to ensure effective implementation and compliance by the NPOs with legislative requirements (for example, annual financial reporting etc.)	MCIL	SFIU and Ministry of Finance		

2. Conduct comprehensive TF risk assessment of the NPO sector, identifying subset of NPOs that satisfy the FATF definition of NPOs under Recommendation 8 and that are at a high risk of abuse for TF.	2.1. Conduct comprehensive TF risk assessment of the NPO sector	MCIL	SFIU, Ministry of the Prime Minister & Cabinet and Ministry of Finance		No fiscal implications
	2.2. Identify a subset of NPOs that satisfy the FATF definition of NPOs under Recommendation 8	MCIL	SFIU, Ministry of the Prime Minister & Cabinet and Ministry of Finance		No fiscal implications
	2.3. Identify the characteristics and features of NPOs that are at a high risk of TF abuse	MCIL	SFIU, Ministry of the Prime Minister & Cabinet and Ministry of Finance		No fiscal implications
	2.4. Identify a total number of NPOs that are at a high risk of TF abuse, as per 2.3 above.	MCIL	SFIU, Ministry of the Prime Minister & Cabinet and Ministry of Finance		No fiscal implications
3. Establish and maintain a risk-based supervisory framework for non-profit organisations consistent	3.1. Based on the findings of the risk assessment under point 2 above, develop and establish a procedure and process to	MCIL	SFIU		No fiscal implications

with relevant international standards and effective for preventing and deterring TF activities.	conduct a targeted risk-based supervision of the NPO sector				
4. Enhance outreach activities promoting NPOs awareness on TF risks and to enhance their capacities to effectively detect and prevent their misuse for TF.	4.1. Update or issue new guidance to the NPO sector on ML/TF, including any suspicious indictors	MCIL	SFIU		No fiscal implications
	4.2. Conduct outreach activities to raise awareness among the NPO sector on ML/TF risks and their capacities to effectively detect and prevent their misuse for ML/TF.	MCIL	SFIU		

Annex II: Action Measure Activities: Gantt Charting

Activities								2024												2025												2026				
	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5
1.1 Publication of the NRA report on the website of the SFIU.																																				
1.2 Conduct outreach activities to inform all FIs, DNFBPs, NPO, competent authorities and supervisory and regulatory bodies of the results and findings of the NRA.																																				
1.3 Conduct a legal review of the existing AML/CFT legal and regulatory framework (including on TF under objective 10) to identify the remaining gaps and shortcomings *vis-à-vis* the FATF Standards.																																				
1.4 Update and issue updated AML/CT guidance to FIs and DNFBPs																																				
1.5 Establish a NCC, with sufficient powers and resources, to ensure the effective implementation and monitoring of this Strategy.																																				
1.6 Undertake the necessary action measures under Objective 5 to develop a targeted risk-based supervisory approach and an implementation plan																																				
1.7 Develop a methodology for data collection and risk profiling of reporting entities in various sectors to develop a risk-based supervisory approach.																																				
1.8 Develop and/or update manuals and procedures for implementing risk-based approach to supervision (including off-site and on-site inspections)																																				

Activities								2024												2025												2026				
	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5
1.9 Issuance of guidance and tools to supervised entities on conducting enterprise-wide ML/TF risk assessments. 1.10 Develop and issue a guidance on identification and verification of beneficial ownership information 1.11 Undertake a comprehensive risk assessment of ML/TF risks associated with international financial services sector, including conducting any legal gap analysis in the existing law and regulations and undertaking necessary amendments.. 1.12 Take measures to establish a system for recording and regular reporting of any changes in the BO information by SIFA.																																				
1.13 Carry out detailed needs assessment exercise to determine the necessary resource requirements, both human and technical, of the SFIU and other LEAs to investigate and prosecute ML/TF cases, and to ensure that they have necessary resource.																																				
1.14 Action measures under Objective 9 on ensuring the collection, maintenance and availability of relevant AML/CFT data/statistics by the competent authorities.																																				

Annex III– Supporting Agencies

Financial Intelligence Unit	
Samoa Financial Intelligence Unit (SFIU)	
Supervisory Authorities	
Central Bank of Samoa	Samoa International Finance Authority
Gambling Casino Authority	Ministry of Commerce, Industry and Labour
Competent Authorities	
The Attorney General's Office	Ministry of Customs and Revenue
Ministry of Commerce, Industry and Labour	Ministry of Finance
Ministry of Police, Prisons and Corrections	Ministry of the Prime Minister and Cabinet
Samoa Audit Office	Transnational Crime Unit
Samoa Airport Authority	Ministry of Foreign Affairs and Trade

Table of Acronyms

AML/CFT	Anti-Money Laundering / Countering the Financing of Terrorism
APG	Asia-Pacific Group on Money Laundering
ADB	Asian Development Bank
AG	Attorney General
AGO	Office of Attorney General
BCRs	Border Cash Reports
CDD	Customer Due Diligence
CID	Criminal Investigation Division
CTA	Counter Terrorism Act
CTRs	Cash Transaction Reports
DNFBPs	Designated Non-Financial Businesses and Professions
EDD	Enhanced Due Diligence
FATF	Financial Action Task Force
FI	Financial Institution
FIU	Financial Intelligence Unit
LEAs	Law Enforcement Agencies
MCIL	Ministry of Commerce, Industry and Labour
MCR	Ministry of Customs and Revenue
MER	Mutual Evaluation Report
ML	Money Laundering
MLA	Mutual Legal Assistance
MLPA	Money Laundering Prevention Act
MoF	Ministry of Finance
MOPPC	Ministry of Police, Prisons and Corrections
MoU	Memorandum of Understanding
MPMC	Ministry of the Prime Minister and Cabinet
MTOs	Money Transfer Operators
NCC	National Coordination Committee
NPO	Non-Profit Organisation
NRA	National Risk Assessment
NRAWG	National Risk Assessment Working Group

PEPs	Politically Exposed Persons
PF	Proliferation Financing
POCA	Proceeds of Crime Act
RCIP	Registration of Companies and Intellectual Property Division
SFIU	Samoa Financial Intelligence Unit
SHC	Samoa Housing Corporation
SIA	Samoa Institute of Accountants
SIFA	Samoa International Finance Authority
SLS	Samoa Law Society
SNPF	Samoa National Provident Fund
STRs/SARs	Suspicious Transaction Reports/Suspicious Activity Reports
TCSPs	Trust or Company Service Providers
TCU	Samoa Transnational Crime Unit
TF/FT	Terrorist Financing/Financing of Terrorism
UNSC	United Nations Security Council
UNSCRs	United Nations Security Council Resolutions