

▶ ANNUAL REPORT

▶ On activities of the Financial Monitoring Center in 2017

▶ Yerevan 2018



FINANCIAL MONITORING CENTER
CENTRAL BANK OF ARMENIA

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ACRONYMS

AML/CFT	Anti-Money Laundering and Counter-Terrorism Financing
CIS	Commonwealth of Independent States
Egmont Group	Egmont Group of Financial Intelligence Units
Eurasian Group	The Eurasian Group on Combating Money Laundering and Financing of Terrorism
FIU	Financial Intelligence Unit
FMC	Financial Monitoring Center of the Central Bank of Armenia
Interagency Committee	Interagency Committee on Combating Money Laundering, Terrorism Financing and Proliferation Financing in the Republic of Armenia
ML/FT	Money laundering and terrorism financing
MONEYVAL Committee	Council of Europe's Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism
Mutual Evaluation Report	Fifth round Mutual Evaluation Report of the Council of Europe's MONEYVAL Committee on Anti-Money Laundering and Counter-Terrorism Financing Measures in Armenia
STR	Suspicious transaction report
UN	United Nations

EXECUTIVE SUMMARY

This report provides a summary of the works implemented by the FMC in the field of AML/CFT over the course of 2017. In particular, the following topics are covered in corresponding chapters of the report:

- **Information on transactions:** statistical data is presented on transactions subject to mandatory reporting and STRs filed by reporting entities to the FMC,
- **Risk analysis and preventive measures:** information is presented on strategic analyses conducted for the identification of ML/FT risks and preventive measures implemented towards the mitigation of identified risks, as well as on instructions cascaded to reporting entities,
- **Cooperation:** information is provided on cooperation in the field of AML/CFT with both domestic and international counterparts, covering the works performed and measured implemented by joint effort, as well as the rankings given by international organizations to the RA in the field of AML/CFT,
- **Information systems:** information is brought on the development of the FMC database, Online Training System on AML/CFT and Integrated Information System.

Statistical data is presented in the concluding Annexes of this report, covering the reporting entities registered with the FMC as at 31 December 2017, trainings provided to reporting entities and memoranda of understanding signed with domestic and international counterparts.

The report is presented pursuant to Part 1(15) of Article 10 of the *Law on Combating Money Laundering and Terrorism Financing (hereafter AML/CFT Law)*.

INFORMATION ON TRANSACTIONS

The FMC collects reports from reporting entities, covering STRs, as well as cash and non-cash transactions exceeding the minimum reporting threshold defined by the AML/CFT Law. Statistical data is presented below on the reports collected in 2016 and 2017.

REPORTS ON CASH TRANSACTIONS

Regulatory requirement

Transactions above AMD 5 million

2017 **232635**

2016 **206065**

REPORTS ON NON-CASH TRANSACTIONS

Regulatory requirement

Transactions above AMD 20 million
and real estate transactions above
AMD 50 million

2017 **193460**

2016 **168329**

SUSPICIOUS TRANSACTION REPORTS

Regulatory requirement

Suspicious transactions and business
relationships

2017 **280**

2016 **256**

STRs were related to suspicions of money laundering and predicate offences

As presented above, the FMC received 256 and 280 STRs in 2016 and 2017, correspondingly, the majority of which (245 and 259 STRs, respectively) were filed by banks. The STRs were related to suspicions of money laundering and

predicate offences.

Summary information is presented below on the involvement of resident and non-resident natural and legal persons in the STRs filed by banks.

	Natural persons		Legal persons	
	Resident	Non-resident	Resident	Non-resident
2016	214	32	73	60
2017	178	49	93	79

The analysis of information received demonstrates that STRs filed on residents (both on natural and legal persons) are mainly related to transactions around tax evasion and unreported economic activity. With regard to non-residents, STRs filed on natural persons are mainly related to various fraud schemes (including illegitimate use of stolen bank card information; mass marketing schemes, etc.). STRs filed on non-resident legal persons were related to transit flows of funds through the banking system of Armenia.

RISK ANALYSIS AND PREVENTIVE MEASURES

AML/CFT risk analyses have an essential role for identifying and assessing ML/FT risks and implementing preventive measures. The FMC and other parties involved in AML/CFT, such as reporting entities, supervisory and law enforcement authorities, have a unique role to play in assessing ML/FT risks and implementing preventive measures.

This part provides information on the risk analysis and preventive measures performed by the FMC, acting as the national FIU for Armenia; particularly, the relevant sections refer to the following topics:

- **Strategic analyses and regulatory amendments for the identification and mitigation of ML/FT risks:** In the reporting period information was collected from reporting entities and other parties involved in AML/CFT for the purpose of ML/FT risk identification and assessment,
- **Instructions (notifications) cascaded to reporting entities:** Instructions for implementing preventive measures were cascaded to reporting entities,
- **Measures towards the harmonized implementation of regulatory requirements by reporting entities:** Discussions were organized to understand the practice of implementation by reporting entities of the requirements specified under the AML/CFT Law, as well as to support the harmonized implementation of the above mentioned requirements,
- **Trainings:** Trainings were organized to develop AML/CFT capacities among the employees of reporting entities, supervisory and law enforcement authorities (information on trainings is provided in Annex 2 of this report).

Continuous implementation of AML/CFT preventive measures is in the focus of the FMC and other parties involved in AML/CFT.

Strategic analyses and regulatory amendments for the identification and mitigation of ML/FT risks

FMC periodically conducts strategic analyses for the identification and mitigation of ML/FT risks. The latest comprehensive strategic analysis of ML/FT risks in Armenia

The national assessment of ML/FT risks has been re-launched

was conducted in 2014, the results of which were consolidated in a document¹ titled “*National Assessment of Money Laundering and Terrorism Financing Risks in the Republic of Armenia*”. In the

reporting period, the Interagency Committee re-launched the national assessment of ML/FT risks. In particular, actions were taken to analyze criminal cases and convictions with ML/FT predicate offences, latent crimes and corruption, in order to assess the associated ML/FT risks, as well as to evaluate the risk of profit and non-profit organizations being misused for ML/FT purposes.

Driven by the importance of mitigating ML risks in the real estate sector, the FMC had drafted relevant regulatory amendments back in 2016, which was aimed at limiting

Draft amendments for limiting cash transactions in real estate were presented to the National Assembly

cash transactions in buying and selling real estate. In the reporting period, the draft regulatory amendments continued to be subject of consultation and review among stakeholder agencies. Several meetings and discussion were organized with legal scholars on the subject of the

draft amendments. After post-discussion improvements, the draft regulatory amendments were approved by the Government and presented to the National Assembly of the Republic of Armenia. The amendments are expected to be approved in the first half of 2018.

¹ The document is meant for official use by competent authorities involved in AML/CFT; however, the introduction and key findings of the report are publicly available on the official webpage of the FMC at the following address:

<https://www.cba.am/Storage/EN/FDK/risk assesment/2014 NRA key findings eng.pdf>

Instructions (notifications) cascaded to reporting entities

In the reporting period 65 instructions and notifications were cascaded to reporting entities in the context of preventive measures. These measures were directed towards raising awareness on ML/FT risks and implementing preventive measures related to the following cases, including:

- Cases with elements of fraud schemes,
- Inflows and outflows from geographies associated with high FT risk,
- Cash transactions and business relationships,
- Risks inherent to mediated/transit flows of funds.

In 2017 alone a total of 52 high-risk transactions were refused and business relationships with customers terminated by banks. In particular, 37 cases from 52 were initiated upon the instructions cascaded to banks by the FMC, while 17 cases were initiated as a result of banks' own analyses, which then became subject of FMC analysis.

52 transactions and business relationships with high ML risks were refused or terminated

In order to mitigate FT risks arising from the increasing international threat of terrorism, continued efforts were invested into collection of information in the context of international cooperation on financial transactions to and from geographies associated with high FT risk, directed towards the identification of potential sources of

Armenia continues to have a very low level of FT risk

funding, patterns, schemes and persons involved in FT. The collected information is systematically analyzed both by reporting entities and the FMC. The FMC analysis demonstrates that FT risks continue to be very low in Armenia. At the same time, instructions were cascaded to reporting entities in order to implement additional measures in relation to transfers to and from geographies associated with high FT risk and to collect maximum detailed information (where impossible, transactions are subject to refusal).

In order to effectively mitigate FT risks, continuous efforts were invested in the reporting period to implement the restrictive measures imposed by international organizations. In particular, the following information was published on the FMC website and notified to reporting entities:

- Updates in the lists published by or in accordance with the UN Security Council resolutions that stipulate for the freezing of assets of persons under, *inter alia*, UNSCR 1267/1989/2253 designations on ISIL (DA'ESH) and Al-Qaeda, UNSCR 1988 designations on the Taliban, and UNSCR 1718 designations on North Korea;
- The FATF statements on countries with strategic deficiencies in their AML/CFT systems, as well as on countries with such strategic deficiencies monitored by the FATF under its on-going global AML/CFT compliance process.

Measures towards the harmonized implementation of regulatory requirements by reporting entities

Harmonized implementation by reporting entities of regulatory requirements set by the *AML/CFT Law* is of key importance for the FMC. For that end, considering the alerts received from reporting entities, the FMC organized a forum in 2017 via the Online Training System on classifying non-face to face transactions and business relationships into the high risk category and performing customer due diligence at corresponding level. During the forum reporting entities answered to the questions raised by the FMC

Financial institutions were notified about risks inherent to mediated/transit flows of funds and corresponding preventive measures.

on the common platform. The results of the forum were summarized and provided to reporting entities.

A total of three circulars were sent to financial institutions, summarizing the findings of FMC analyses. The circulars were related to cash transactions and business relationships, risks inherent to mediated/transit flows of funds, corresponding preventive measures and establishment of non-face to face business relationships with customers from geographies associated with high risk.

COOPERATION

Domestic cooperation

Domestic cooperation for AML/CFT can be divided into two areas:

- Cooperation for policy development and coordination in the context of the Interagency Committee established under the *Republic of Armenia President's Ordinance No. 1075-N of March 21, 2002*,
- Cooperation among the FMC, supervisory and law enforcement authorities in the context of information exchange, implementation of preventive measures and detection of potential cases of ML/FT.

Interagency Committee

In the reporting period, the Interagency Committee continued pursuing the objectives set out in the *2016-2018 National Strategy for Combating ML/FT and proliferation financing*. The Interagency Committee always focuses on enhancing domestic

Guidance for ML Investigations was developed

cooperation in the area of AML/CFT, challenging issues related to AML/CFT, as well as the progress and results of implementing the action plan for closing the deficiencies and gaps identified in the

Mutual Evaluation Report. In this context, the development of the *Guidance for ML Investigations* for law enforcement authorities was completed in 2017. The guidance was presented to the Academy of Justice and the Police Education Center in order to be included in the educational program for the next academic year.

Cooperation with law enforcement authorities

The cooperation between the FMC and law enforcement authorities is mainly around information exchange on ML/FT hypotheses. As a result of FMC analyses, disseminations were made to law enforcement authorities with ML hypotheses, which included the following most common schemes:

- Various fraud schemes, including:
 - ✓ Obtaining bank card information by way of mistreating cardholders, illegitimate transactions via virtual POS terminals by using stolen bank card information,
 - ✓ Attempts to legalize proceeds of crimes committed through the use of various mass marketing schemes.

- Transit flow of funds through the Armenian banking system, where the funds are originating from outside of Armenia in other countries with unknown (potentially criminal) sources,
- Financial transactions potentially aimed at tax evasion, illegal entrepreneurship and unreported economic activity,
- Other cases with similarities to the schemes described in the typologies published by the Central Bank of Armenia.

The table below presents statistical data for 2016-2017 on disseminations made to law enforcement authorities resulting from analyses with ML hypotheses, as well as on requests made by the FMC to law enforcement authorities and vice-versa.

	2016	2017	Total
Disseminations from FMC to law enforcement authorities	34	37	71
Requests from FMC to law enforcement authorities	11	5	16
Requests from law enforcement authorities to FMC	36	58	94
Criminal cases instigated	5	2	7

In 2017 a total of four convictions were made with elements of ML, including one conviction for a standalone ML offence. The rest of the convictions had the following predicate offences: theft, fraud, production and alienation of counterfeit payment instruments, and tax evasion.

Memoranda of understanding and other initiatives

In 2017, the FMC continued efforts in achieving the objectives set out in the *2016-2018 National Strategy for Combating ML/FT and proliferation financing*, directed towards enhancing domestic cooperation and improving the effectiveness of the fight against ML/FT and proliferation financing (hereafter PF).

In the reporting period, memoranda of understanding were signed and updated with supervisory and law enforcement authorities. In particular,

- Memoranda of understanding were updated between the FMC and National Security Service Adjunct to the Government of the Republic of Armenia, as well as between the FMC and the State Revenue Committee Adjunct to the Government of the Republic of Armenia,
- In order to enhance cooperation in the area of supervision over reporting entities, a memorandum of understanding was signed between the FMC and the Ministry of

Finance of Armenia, whereas a similar arrangement with the Ministry of Justice of Armenia is in the discussion stage,

- In order to collect information on potential turnover of materials sensitive towards proliferation of weapons for mass destruction, a memorandum of understanding was signed between the FMC and the Ministry of Economic Development and Investments of Armenia.

The list of memoranda of understanding between the FMC and other state bodies involved in AML/CFT is presented in Annex 3 of this report.

In 2017 upon the initiative of the FMC and law enforcement authorities a total of 15 meetings and discussions were organized, directed towards raising the effectiveness of

Conferences were held on “ML/FT risks and investigations” and “Current issues in ML investigations”, attended by international experts

ML investigations. In order to discuss current issues and develop capacities for law enforcement authorities in charge of ML investigations, conferences were organized on the topics of “ML/FT risks and investigations” and “Current issues in ML investigations”, which were attended by approximately 40 employees of various law

enforcement authorities. The forums hosted discussions about the gaps identified in the Mutual Evaluation Report, best solutions for closing identified gaps, recent developments in the national risk assessment methodology, parallel financial investigations, international best practices in resolving to a ML hypothesis and other topics. One of the speakers at the conference on “ML/FT risks and investigations” was an international expert in ML/FT assessments from the US Department of the Treasury’s Financial Crimes Enforcement Network, who shared insights from the US experience.

Supervision and examinations

In the reporting period the FMC continued cooperating with supervisory authorities of financial institutions and designated non-financial businesses and professions to support adequate compliance with AML/CFT regulatory requirements.

Examinations and other supervisory measures resulted in penalties imposed on reporting entities, 15 financial institutions and 13 designated non-financial businesses and professions, in the form of warnings and fines.

The violations of AML/CFT regulatory requirements by financial institutions were mainly related to incompliance with requirements on customer due diligence, record keeping, competencies of the internal compliance service, internal procedures and reporting by internal compliance service to senior management.

The violations by designated non-financial businesses and professions were mainly related to incompliance with requirements to register under the AML/CFT Law, internal procedures, internal compliance service, and record keeping.

International cooperation

In the context of AML/CFT, the FMC continues cooperation both with foreign FIUs (in terms of information exchange) and international organizations involved in AML/CFT (in terms of joint implementation of various projects). Armenia, represented by the FMC, participates in the mandate of international organizations involved in the development of AML/CFT international standards, as well as in the introduction and implementation of standards at individual country level. Such organizations include the Council of Europe's MONEYVAL Committee, the Egmont Group, the Eurasian Group, and the Council of Heads of CIS FIUs.

MONEYVAL Committee

In the reporting period, the FMC participated in the implementation of MONEYVAL's work plan as part of the Armenian delegation. In the context of the fifth round mutual evaluations of AML/CFT systems conducted by the MONEYVAL Committee, representatives of the FMC participated as financial and legal evaluators in the assessment of national systems for combating ML/FT and PF in the Czech Republic and Latvia, and acted as reviewing experts in evaluations of Ukraine and Hungary. The MONEYVAL Committee did not discuss any issues related to Armenia in the reporting period. Nevertheless, MONEYVAL is scheduled to discuss the progress report of the fifth round mutual evaluation of Armenia's AML/CFT system, which initiated a preparation work in the reporting period by the FMC and other parties involved in AML/CFT.

Egmont Group

The FMC continued exchanging information with foreign FIUs through Egmont Group's secure information network. The FMC also participated in the joint project between Egmont Group and the University of Toronto, directed towards the identification of legal impediments in exchanging information between FIUs across borders. The FMC continued sponsoring Turkmenistan FIU for accession into Egmont Group.

Eurasian Group

In the reporting period, the FMC and other authorities attended the plenary session of the Eurasian Group, the meetings of working groups, as well as the meeting organized by the UN Security Council Counter-Terrorism Committee on identifying individual terrorists and enforcement of target financial sanctions. During the plenary session of the Eurasian Group, among other topics of the agenda, the mutual evaluation report for

Kyrgyzstan was discussed, where an FMC representative participated as a law enforcement evaluator.

Council of Heads of CIS FIUs

In the framework of the Ashgabat Agreement, endorsed by the National Assembly of Armenia on the 8th of February 2017, Armenia became a full member of the Council of Heads of CIS FIUs. The main mission of the Council is to support cooperation between member FIUs in the context of AML/CFT. During the Council meetings taking place in the reporting period, the FMC presented the results of the study on the formation of harmonized approaches in combating PF and the practice of information exchange between CIS FIUs.

International Rankings

The Basel Institute AML Index Report was published in August of 2017, which ranks 146 countries according to the level of ML/FT risks in the country. The ranking takes

Basel Institute AML Index Report indicates low ML/FT risk for Armenia

into account such factors as the strength of the AML/CFT system, institutional capacities, as well as transparency in financial and public sectors. The rankings are based on mutual evaluation reports

by the FATF (as well as regional-type bodies like the MONEYVAL Committee), and publications by the Transparency International, The World Bank and other organizations. According to the report, Armenia is on the 134th place among 146 countries², being considered a country with low level of ML/FT risks.

Foreign FIUs

The FMC continued cooperation with foreign FIUs, leading to 27 information requests received and 12 sent in 2017. In the course of the last two years the highest number of information requests were sent to the FIUs in USA, Latvia, Russia, while the highest number of request were received from Russia, Latvia, Ukraine, USA and Moldova.

Complete information on 34 memoranda of understanding signed with foreign FIUs is presented in Annex 3 of this report.

² Countries with highest risk on the first rankings are Iran, Afghanistan, Tajikistan and Guinea Papua. Finland is associated with the lowest ML/FT risk.

DEVELOPMENT OF INFORMATION SYSTEMS

In the course of 2017 the information systems at FMC were further developed, including:

- In the context of developing the information systems required to support the analytical function of the FMC, a new architecture for the online report submission system was designed following the analogy in the FISMM model of the Egmont Group. Upon completion, a unified report submission system will be implemented with integrated analytical tools. The design of the new system is scheduled for completion in 2018.
- Continuous efforts were invested in gaining access to information databases of law enforcement authorities and in exchanging information with law enforcement authorities through a fast and secure channel. In the reporting period, the State Revenue Committee of Armenia and the Investigative Committee of Armenia joined the existing Integrated Information System, providing for information exchange through a fast and secure channel.
- In the reporting period, the FMC Online Training System was launched. The main mission of the Online Training System is to raise AML/CFT awareness among reporting entities by way of providing systematically organized information. In 2017, approximately 220 participants attended the Online Training System, including employees of reporting entities and other interested parties. International best practice in online training systems was studied and new solutions were identified for implementation.

The FMC Online Training System was launched

ANNEXES

Annex 1. Reporting entities and filing of reports

Reporting entities	Registered at FMC	Reports filed to FMC	
		Mandatory Reporting Transactions	Suspicious Transaction Reports
<i>Financial institutions</i>			
Banks	17	414204	259
Credit organizations	35	1743	5
Traders in foreign exchange	180	114	-
Broker-dealers in foreign exchange	1	286	-
Licensed money (currency) transfer services	6	276	5
Investment firms	9	1054	1
Investment fund managers	3	-	-
Central depository	1	-	7
Insurance (reinsurance) companies	8	-	-
Insurance (reinsurance) agents	3	-	-
Corporate investment funds	-	-	-
Non-public contractual investment funds without a licensed manager	10	-	-
Pawn shops	113	531	1
<i>Non-financial institutions</i>			
Realtors	205	-	-
Notaries	113	7865	-
Attorneys, independent lawyers and law firms	1499	-	-
Independent accountants and accounting firms	10	-	-
Independent auditors and audit firms	31	-	-
Dealers in precious metals	-	-	-
Dealers in precious stones	22	-	-
Dealers in art work	-	-	-
Action houses	-	-	-
Organizers of games of chance and casinos	4	19	-
Organizers of lotteries	5	2	-
Organizers of internet games of chance	3	1	2
Trust and company service providers	-	-	-
<i>Others</i>			
Credit bureaus	1	-	-
TOTAL	2279	426095	280

Annex 2. Trainings for reporting entities

<i>Training Topic</i>	<i>Reporting entities</i>	<i>Attendees</i>
Recent developments in AML/CFT, including: <ul style="list-style-type: none"> • Identification, assessment and mitigation of ML/FT risks: presentation of international best practices and tendencies, • Feedback on STRs filed by banks, exemplary procedures for filing STRs. 	Banks	20
Recent developments in AML/CFT, including: <ul style="list-style-type: none"> • ML risks in agricultural sector, • Presentation of exemplary procedures for filing STRs by credit organizations. 	Credit organizations	28
Recent developments in AML/CFT, including: <ul style="list-style-type: none"> • Presentation of new tendencies, risks and recent schemes in ML/FT, • Presentation of international sanctions against ML/FT and PF, • Presentation of exemplary procedures for filing STRs by money transfer services. 	Money transfer services	5
Recent developments in AML/CFT, including: <ul style="list-style-type: none"> • Presentation of new tendencies, risks and recent schemes in ML/FT, • Presentation of exemplary procedures for filing STRs by insurance companies. 	Insurance companies	6
Recent developments in AML/CFT, including: <ul style="list-style-type: none"> • Presentation of new tendencies, risks and recent schemes in ML/FT, • ML/FT high risk and suspicion criteria, red flags. 	Investment service providers	8
Recent developments in AML/CFT, including: <ul style="list-style-type: none"> • ML/FT high risk and suspicion criteria, red flags. 	Pawn shops	27
Recent developments in AML/CFT, including: <ul style="list-style-type: none"> • ML/FT high risk and suspicion criteria, red flags, • Presentation of international sanctions against ML/FT and PF. 	Traders in foreign exchange	18
Recent developments in AML/CFT, including: <ul style="list-style-type: none"> • ML/FT high risk and suspicion criteria, red flags, • Presentation of exemplary procedures for filing STRs by organizers of games of chance, lotteries and casinos, • Presentation of international sanctions against ML/FT and PF. 	Organizers of games of chance, lotteries and casinos	13
Recent developments in AML/CFT, including: <ul style="list-style-type: none"> • ML/FT high risk and suspicion criteria, red flags, • Presentation of exemplary procedures for filing STRs by audit firms, • Presentation of international sanctions against ML/FT and PF. 	Audit firms	23
Recent developments in AML/CFT, including: <ul style="list-style-type: none"> • ML/FT high risk and suspicion criteria, red flags, • Presentation of international sanctions against ML/FT and PF. 	Notaries	17
Recent developments in AML/CFT, including: <ul style="list-style-type: none"> • ML/FT high risk and suspicion criteria, red flags, • Presentation of exemplary procedures for filing STRs by attorneys. 	Attorneys	35

Annex 3. Memoranda of understanding

Memoranda of understanding between the FMC and domestic competent authorities

Law enforcement authorities

- General Prosecutor's Office (updated on 28.11.2016)
- National Security Service (updated on 24.01.2017)
- Police (updated on 18.11.2016)
- State Revenues Committee (updated on 25.09.2017)
- Investigative Committee (signed on 16.11.2016)

Other competent authorities

- Academy of Justice (signed on 12.11.2016)
- Ministry of Economic Development and Investments (signed on 19.01.2017)
- Ministry of Finance (signed on 10.10.2017)

Memoranda of understanding between the FMC and foreign FIUs

Country	Date	Country	Date
 Australia	26.08.2009	 Montenegro	12.07.2011
 Belarus	04.02.2008	 Panama	03.07.2013
 Bermuda	21.10.2009	 Poland	22.09.2009
 Canada	21.12.2009	 Romania	27.05.2009
 China	08.06.2011	 Russia	09.06.2015
 Croatia	11.07.2012	 San Marino	15.03.2010
 Cyprus	11.07.2012	 Saudi Arabia	12.07.2011
 Georgia	26.02.2008	 Serbia	12.07.2011
 Israel	03.11.2011	 South African Republic	22.05.2009
 Iran	26.05.2010	 Taiwan	12.07.2011
 Japan	29.10.2012	 Tajikistan	19.05.2011
 Kazakhstan	11.11.2015	 Thailand	29.11.2010
 Kyrgyzstan	19.02.2014	 Turkmenistan	24.10.2017
 Latvia	28.10.2017	 Ukraine	13.03.2008
 Lichtenstein	04.06.2014	 United Arab Emirates	28.05.2009
 FYR Macedonia	13.07.2011	 United Kingdom	27.09.2012
 Moldova	12.07.2011	 Vatican	14.04.2017