



**FINANCIAL MONITORING CENTER  
CENTRAL BANK OF THE REPUBLIC OF ARMENIA**

**ANNUAL REPORT**

**2015 ACTIVITIES IN THE FIELD OF  
COMBATING MONEY LAUNDERING AND TERRORISM  
FINANCING  
IN THE REPUBLIC OF ARMENIA**

**YEREVAN, 2016**



## Contents

Acronyms .....	3
Introduction .....	4
1. Regulatory framework and developments .....	4
2. Analyses, investigations and outcomes .....	4
3. Domestic cooperation .....	7
4. International cooperation.....	7
5. Violations and sanctions.....	11
6. Trainings, consultancy and technical assistance .....	12
Annexes.....	13



## Acronyms

<b>AML/CFT</b>	Ant-money laundering and counter-terrorism financing
<b>CBA</b>	Central Bank of Armenia
<b>CHFIU CIS</b>	Council of Heads of FIU of the Commonwealth of Independent States
<b>CIS</b>	Commonwealth of Independent States
<b>FIU</b>	Financial Intelligence Unit
<b>FMC</b>	Financial Monitoring Center
<b>FSD</b>	Financial Supervision Department
<b>FSRD</b>	Financial System Regulation Department
<b>IIS</b>	Integrated Information System
<b>IMF</b>	International Monetary Fund
<b>LEA</b>	Law enforcement agency
<b>ML/FT</b>	Money laundering and terrorism financing
<b>PF</b>	Proliferation financing
<b>UN</b>	United Nations



## Introduction

This report summarizes the works implemented and outcomes achieved in the field of AML/CFT in the Republic of Armenia over the course of 2015, which have provided for reaching the objectives of the 2013-2015 National Strategy for Combating Money Laundering and Terrorism Financing in the Republic of Armenia.

The works have been facilitated by multilateral cooperation with national authorities and international institutions and have been aimed at enabling legislative regulation of the fight against ML/TF, identifying potential cases of ML/TF, strengthening international and domestic cooperation, improving ML/TF awareness of the relevant staff of reporting entities, and ensuring professional development of the personnel within the FMC and the other agencies involved in the fight against ML/TF.

In 2015 the Council of Europe's MONEYVAL Committee plenary session on December 10 adopted the 5<sup>th</sup> round assessment report on Armenia's AML/CTF system (hereinafter referred to as the Assessment Report)<sup>1</sup> thus consummating an evaluation exercise commenced as early as in 2014 to assess the compliance of the country's AML/CTF system with the FATF 40 Recommendations.

### 1. Regulatory framework and developments

In 2015, works aimed at the improvement of the necessary AML/CTF mechanisms, as well as at the introduction of legislation in line with international standards have continued by means of adopting regulatory acts at various levels of legal hierarchy, and publicizing methodical clarifications and guidelines on their application.

The decisions of the Chairman of the Central Bank No. 1/324A and 1/325A from April 22, 2015 endorsed, respectively, the *“Rules for Proposing Persons or Entities for Designation under the Lists Published by or in Accordance with the United Nations Security Council Resolutions; for Designating Persons or Entities under the Lists Published by the Authorized Body”* and the *“Guidance on Freezing of Property of Designated Persons and Entities, Providing Access to Frozen Property and Related Actions”*.

Since December 2015 works have commenced to draft amendments and additions into a number of legal acts based on the recommendations of the Assessment Report adopted at the 49<sup>th</sup> plenary session of the MONEYVAL Committee.

### 2. Analyses, investigations and outcomes

In 2015, within the framework of combating ML/TF the FMC has conducted comprehensive analyses based on the signals and reports on suspicious transactions and business relationships

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<sup>1</sup> See the details in Section 4, *“International Cooperation”*.



with the potential of comprising ML/TF elements<sup>2</sup>. The results of analyzes have been disseminated to law enforcement agencies and foreign FIUs, as appropriate, in the form of notifications setting out, *inter alia*, relevant ML/TF hypotheses. The schemes identified due to the analyses of received information have been diverse and manifold but, as in previous years, the following typical examples have been traced more frequently:

- Various fraud schemes related to counterfeit cards, stolen data on cards issued by foreign banks, attempts to legalize proceeds of crimes committed by the use of computer technologies, as well as of different schemes of mass marketing fraud;
- Financial transactions potentially aimed at tax evasion, illegal entrepreneurship and underreported economic activity;
- Other cases with similarities to the schemes described in the typologies published by the Central Bank.

The statistics on the notifications and requests sent by the FMC to law enforcement agencies, as well as on the requests received from law enforcement agencies over the period 2010-2015 is presented in Table 1 below.

*Table 1*

	2010	2011	2012	2013	2014	2015	Total
FMC notifications to LEAs	23	17	11	25	28	31	135
FMC requests to LEAs	15	33	11	17	17	9	102
LEA requests to FMC	53	58	61	36	66	36	310

Within the framework of cooperation with foreign counterparts, in 2015 the FIU made 28 to and received 26 requests from foreign FIUs (see Table 2).

*Table 2*

	2010	2011	2012	2013	2014	2015	Total
Foreign FIU requests to FMC	25	36	11	32	17	26	147
FMC requests to foreign FIUs	28	30	38	24	39	28	187

It should be noted that in 2015 criminal prosecution authorities instigated 4 criminal cases. One criminal case was instigated for standalone money laundering and the other three cases were instigated for charges of laundering proceeds of the following predicate offences:

- Fraud;
- Embezzlement by use of computer technologies;
- Theft.

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<sup>2</sup> See Annex 1.



The statistics on initiated criminal cases and convictions, on the funds involved in transactions and business relationships suspended by the decisions of the Central Bank Board, as well as on the funds subject to confiscation under ML convictions achieved in the period 2010-2015 is presented in Tables 3 and 4.

*Table 3*

	2010	2011	2012	2013	2014	2015	Total
Criminal cases	13	12	9	10	9	4	57
Convictions	3	5	2	2	1	0	13

*Table 4*

	Funds involved in transactions and business relationships suspended by Central Bank Board decisions	Funds subject to confiscation <sup>3</sup>
2010	AMD 345.000; USD 290.000	AMD 514.026.500
2011	0	AMD 415.517.535
2012	AMD 23.003.274	AMD 12.220.947
2013	AMD 54.893.971	AMD 25.079.666
2014	0	AMD 283.600
2015	AMD 10.000.000	0
<b>Total</b>	<b>AMD 88.242.245; USD 290.000</b>	<b>AMD 967.128.248</b>

In order to mitigate the potential ML/TF risks, measures have been also taken to prevent the misuse of the financial and non-financial systems of Armenia for ML/TF purposes.

In view of the developments in the region, within the framework of the fight against terrorism financing the FMC has conducted strategic and operational analyses to detect possible sources, trends and schemes of terrorism financing, as well as to identify the persons involved. Information has been collected and analyzed on the transactions conducted within the reporting period in any way related to areas considered high-risk in terms of the terrorism financing. The results of the analyses, as appropriate, have been disseminated to the relevant domestic authorities, as well as to foreign FIUs and appropriate structures. As a result, once again it has been verified that the risks of terrorism financing in Armenia are very low, as also reflected in the findings of the National Assessment of Money Laundering and Terrorism Financing Risks conducted in 2014. From among the preventive measures taken within the reporting period, one should emphasize the assignments issued to the financial institutions operating in the territory of Armenia to carry out more in-depth scrutiny and request additional justification in relation to transactions associated with high-risk countries and territories, and to refuse and/or suspend the transactions in the absence of sufficient information.

<sup>3</sup> In addition to the funds subject to confiscation for the benefit of the state budget, as shown in the table, convictions for money laundering passed in 2011 satisfied claims for the forfeiture of an additional AMD 83.535.019 for the benefit of third parties.



### 3. Domestic cooperation

An AML/CFT regime requires effective cooperation among competent domestic authorities, which in fact has been carried out on various platforms during the reporting period.

In 2015 the FMC and the competent authorities involved in the fight against ML/TF continued implementation of the IIS system to enable timely exchange of information through secure channels.

The three-year Action Plan to address the shortcomings identified under the National Assessment of Money Laundering and Terrorism Financing Risk in the Republic of Armenia has been drafted and, upon agreement with the stakeholder agencies, approved by the Standing Interagency Committee on Combating Counterfeit Money, Fraud with Plastic Cards and Other Payment Instruments, Money Laundering and Terrorism Financing established by the Presidential Ordinance No. NK -1075 from March 21, 2002 (hereinafter referred to as the Interagency Committee). This Action Plan has built on the findings of the national risk assessment considered by the Interagency Committee in 2014, with the aim to remedy identified vulnerabilities and to improve the effectiveness in countering ML/TF threats.

In the framework of national cooperation within the reporting period, the FMC has implemented a number of training programs, as presented in Section 6 of this report titled *"Training, consultancy and technical assistance"*

### 4. International cooperation

The FMC provides for international cooperation in the field of AML/CTF, representing Armenia in international structures and collaborating with foreign financial intelligence units.

During the reporting period, the FMC has furthered its cooperation with international counterparts by involving in the improvement of international instruments, as well as in other international initiatives.

Actions have been taken to fulfill the requirements of the restrictive measures imposed by international structures. Thus, the FMC published on its web site and notified to the reporting entities the following:

- Updates to the lists published by or in accordance with the UN Security Council (hereinafter referred to as the UNSC) resolutions stipulating the requirement for freezing of assets, including updates to the lists defined under resolutions 1267/1989/2253 and 1988 with regard to ISIL (DAESH) and Al-Qaida, Taliban and associated persons;
- FATF statements on jurisdictions with strategic deficiencies in their AML/CTF regime, as well as on jurisdictions which, as part of the FATF's on-going review of compliance with the AML/CFT standards, have been identified as having strategic AML/CFT deficiencies for which they have developed an action plan with the FATF.

The amendments and additions have also been updated in the FMC database.



## Council of Europe's MONEYVAL Committee

### Fifth round assessment of the Armenian AML/CFT system

The process of the fifth round assessment of the Armenian AML/CTF by the Council of Europe's MONEYVAL Committee (hereinafter referred to as MONEYVAL Committee), which had begun in June 2014, was completed in 2015. Armenia was the first MONEYVAL country to be assessed under the revised FATF Recommendations.

The FATF Methodology revised in 2013 uses the complementary approach of assessing AML/CTF systems for their technical compliance with the FATF Recommendations and for the effectiveness of the system.

In May 2015 the country received a two-week visit of an evaluation team led by the Executive Secretary of the MONEYVAL Committee.

During the visit, the evaluation team met and held discussions both with the Interagency Committee and the members of its Working Group, and with the authorized representatives of other government agencies and the private sector involved in the fight against ML/TF and PF. Overall, more than 50 meetings were held with around 250 representatives of agencies with competencies to combat ML/TF and PF.

Subsequent to the visit, the evaluation team of the MONEYVAL Committee drafted and presented the preliminary findings of the assessment on the key issues identified. The mentioned document was circulated among the concerned agencies involved in the process, and their comments were collected and submitted to the MONEYVAL Committee.

Taking into account the comments submitted by the Armenian authorities, the evaluation team of the MONEYVAL Committee drafted the full assessment report, which, again, was circulated among the concerned agencies involved in the process, and their comments were collected and submitted to the MONEYVAL Committee.

In November, representatives of the FMC, the Ministry of Justice and the General Prosecutor's Office held a meeting with the evaluation team in Strasbourg to discuss the draft report.

On December 10, 2015 the 49<sup>th</sup> plenary session of the MONEYVAL Committee considered and adopted the fifth round assessment report of the Armenian AML/CTF system.

The report states that:

- In terms of technical compliance, the Armenia is fully or largely compliant with 35 out of 40 FATF Recommendations;
- In terms of effectiveness, Armenia demonstrates a significant or moderate level of effectiveness for 9 out of 11 Immediate Outcomes.

A substantial or moderate level of effectiveness has been demonstrated in the areas of international cooperation, preventive measures implemented in the financial system, transparency of legal entities, consideration of TF cases, implementation of TF preventive measures, as well as of the fight against proliferation financing.





At the same time, it has been stated that additional measures are to be implemented in respect of ML-related investigations and subsequent judicial proceedings, as well as of confiscation of property.

The MONEYVAL Committee decided that the progress report on the actions taken on the basis of the report should be produced in April 2018, whereas an interim report on certain issues should be presented in December 2016.

### Plenary sessions of the MONEYVAL Committee

During the reporting period, the FMC representatives have joined the Armenian delegation to attend the 47<sup>th</sup>-49<sup>th</sup> plenary sessions of the MONEYVAL.

The following main issues were discussed during the sessions:

- Country reports on implementation of the UNSC Resolutions 2161 (2014), 2170 (2014) and 2199 (2015);
- Progress reports on the 3<sup>rd</sup> round assessment of Ukraine and the Holy See;
- Reports on the 4<sup>th</sup> round assessment of Montenegro, Bosnia and Herzegovina, the United Kingdom dependencies of Jersey and Guernsey;
- Reports on application of Enhanced Compliance Procedures with regard to Lithuania, Bosnia and Herzegovina;
- Progress reports on the 4<sup>rd</sup> round assessment of a number of MONEYVAL member countries<sup>4</sup>;
- The report of the 5<sup>th</sup> round of assessment of the Republic of Armenia.

The FMC representatives have acted as the legal evaluator for the 4<sup>th</sup> round assessment of Montenegro, and as the legal expert within the special review group for the assessment of the United Kingdom dependency of Jersey.

### Preparatory course for the MONEYVAL Committee's fifth round assessments

According to the agreement reached with the MONEYVAL Committee, in March 2015 an AML/CTF assessor qualification training was held at the Dilijan Research and Training Center of the Central Bank attended by 5 representatives of the FMC, the Ministry of Justice and the General Prosecutor's Office and by 28 representatives of the MONEYVAL member states, who thus were qualified for mutual country evaluations.

### Egmont Group of Financial Intelligence Units

In January and June the FMC delegation attended the meetings of the Working Groups and the plenary session of the Egmont Group. A summary report of a project initiated and led by the

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<sup>4</sup> Andorra, FYR Macedonia, Czech Republic, Malta, Poland, Georgia, Slovenia, Latvia, Slovakia, Israel, Moldova, Azerbaijan, Bulgaria, Croatia, Lithuania.



FMC, which aimed at improving the efficiency of information exchange between the Egmont Group member FIUs, was presented to the Egmont Group Committee. The process of developing joint guidelines with the FATF based on the outcomes of the project was discussed.

Within the Information Technologies Working Group, the members of the FMC delegation introduced the outcomes of the national ML/TF risk assessment and of the self-assessment carried out by the FMC on the basis of the FIU information system maturity model.

Within the Outreach Working Group, the works for the FMC-sponsored Egmont Group accession of the Islamic Republic of Iran and Turkmenistan were presented.

Within the training programs organized by the Egmont Group, the FMC representatives made presentations on the self-assessment based on the FIU information system maturity model and on the national ML/TF risk assessment.

### *Financial Action Taskforce*

The FMC delegation attended, in the capacity of an observer, the plenary sessions of the FATF in February and June, which, *inter alia*, considered mutual assessment reports of the FATF member countries.

Within the framework of the FATF Working Group meetings, the FMC representative made a presentation on the national ML/TF risk assessment.

### *Conference of Parties to Warsaw Convention*

During the reporting period, works were implemented for assessing compliance of Armenia with the Council of Europe 2005 Warsaw Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism. To that end, in September representatives of the FMC and the Ministry of Justice attended the preliminary discussion on the country's compliance with the Convention.

The FMC delegation attended the 7<sup>th</sup> session of the latter, where the FMC representative was elected as a member of the Bureau of the Conference of the Parties.

In July 2015 the FMC representative took part in a training seminar for evaluation experts organized by the Conference of the Parties established under the Convention, to participate in the evaluation of compliance of the countries that ratified the Convention.

### *Eurasian Group on Combating ML/TF*

On behalf of Armenia as an observer to the Eurasian Group, the FMC has continued to actively participate in the initiatives of the Group.

In November, the Armenian delegation took part in the 23<sup>th</sup> plenary session of the Eurasian Group, which considered the following main issues:

- Schedule for the 2<sup>nd</sup> round evaluations of the member countries' AML/CTF systems;
- Progress reports on the mutual assessments of the AML/CTF systems of Belarus, Kazakhstan, Turkmenistan and Uzbekistan;



- Issues related to the expansion of the Eurasian Group observer membership.

### *Council of Heads of FIUs of the CIS countries*

During the reporting period, the FMC delegation took part in the 5<sup>th</sup> and 6<sup>th</sup> sessions of the CHFIU CIS, as well as in the meetings of its Working Groups.

The following main issues were discussed during the sessions:

- Rules of procedure and composition of the Working Group for the assessment and mitigation of ML/TF risks and threats; the FMC representative was elected as the leader of the group;
- Amendments and supplements to the October 5, 2007 agreement between CIS member states for the fight against ML/TF;
- Measures to identify persons involved in international terrorist organizations;
- Expansion of the Eurasian Group observer membership and their cooperation with other bodies of the CIS.

In September and November the FMC delegation participated in the meetings of the Working Group for the assessment and mitigation of ML/TF risks and threats to draft relevant procedures and to discuss the following main issues:

- Rules of procedure and 2016-2017 work program of the Working Group;
- Experience of the countries' national ML/TF risk assessment;
- Methodology for a regional risk assessment.

To provide for cooperation in the exchange of information between member states within the framework of the CHFIU CIS agreement, the FMC has integrated into the videoconference system of the uniform information platform of the Eurasian Group, which enables organizing and conducting real-time courses and workshops.

### *Cooperation Agreements between FMC and FIUs*

During the reporting period, the FMC signed a memorandum of understanding with the Kazakh FIU. The FMC has also re-signed the memoranda of understanding previously signed with the FIUs of the Russian Federation and Croatia, as per the Egmont Group's revised version of a model memorandum of understanding. As of 2015, the FMC has memoranda of understanding with the FIUs of 31 countries<sup>5</sup>.

## **5. Violations and sanctions**

During 2015 a number of irregularities have been ascertained due to the inspections of the reporting entities, both financial and non-financial institutions, and appropriate sanctions have been applied.

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<sup>5</sup> See Annex 2.



Violations of the legislation by financial institutions mainly related to customer due diligence, record keeping, competencies of the internal compliance, internal regulations, requirements related to the internal compliance reporting to the senior management and the like. Imposed sanctions, according to the types of financial institutions, are presented in Table 5.

*Table 5*

<b>Sanctions imposed on financial institutions in 2015</b>	
<b>Banks</b>	23 violations were committed by 8 banks, resulting in: <ul style="list-style-type: none"><li>• Warnings issued for 11 violations;</li><li>• A warning and a fine of AMD 500,000 imposed for 1 violation;</li></ul>
<b>Credit organizations</b>	3 violations were committed by 1 credit organization, resulting in AMD 350,000 in fines
<b>Insurance companies</b>	3 violations were committed by 2 insurance companies, resulting in warnings issued for all violations
<b>Exchange bureaus</b>	4 violations were committed by 4 exchange bureaus, resulting in warnings issued for all violations

As for non-financial institutions, within the reporting period sanctions have been applied on 2 organizers of internet games of chance in the form of a fine AMD 200,000 on each, for the failure to have internal regulations stipulated by the Law on Combating Money Laundering and Terrorism Financing, and to register with the Authorized Body within one month after the licensing.

The FMC employees have taken part in the inspections of financial institutions to support the examination of their internal AML/CTF systems.

## **6. Trainings, consultancy and technical assistance**

In order to deepen the knowledge and to further build the capacities of the competent authorities involved in the fight against ML/TF, as well as of the relevant staff of reporting entities, a number of training programs and events have been organized in 2015, as presented in Annexes 3 and Appendix 4 below.



## Annexes

*Annex 1*

### Disclosures to the Financial Monitoring Center

Reporting entities	Registered as of December 31, 2015	Disclosures to FMC by reporting entities in 2015	
		<i>Over-threshold</i>	<i>STR</i>
<b>Financial institutions</b>			
Banks	22	347841	231
Credit organizations	32	802	4
Entities engaged in foreign currency exchange	191	31	-
Dealers and brokers in foreign currency exchange	1	70	-
Licensed entities engaged in money (currency) transfer services	6	173	1
Investment firms (entities providing investment services, as defined under the Law on Securities Market)	8	410	1
The central depository of regulated market securities (as defined under the Law on Securities Market)	1	-	-
Insurance (including re-insurance) companies	8	-	-
Entities providing intermediary insurance (including re-insurance) services	2	-	-
Pawnshops	114	744	-
<b>Non-financial institutions</b>			
Realtors	215	-	-
Notaries	100	7183	2
Attorneys, independent lawyers and law firms	1491	-	-
Independent accountants and accounting firms	8	-	-
Independent auditors and auditing firms	34	-	-
Dealers in precious metals	-	-	-
Dealers in precious stones	21	-	-
Dealers in works of art	-	-	-
Organizers of auctions	-	-	-
Entities organizing games of chance and casino	11	19	-
Entities organizing lotteries	4	-	-
Entities organizing internet games of chance	4	-	-
Trust and company service providers	-	-	-
Credit bureaus	-	-	-
The authorized body in charge of the integrated state cadaster of real estate (registrars)	165	873	-
The authorized body in charge of registering legal person (State Registry)	1	-	-
<b>Total</b>	<b>2439</b>	<b>358146</b>	<b>239</b>



## MoUs between the FMC and foreign FIUs

<b>Country</b>	<b>FIU name</b>
Australia	Australian Transaction Report and Analysis Center
Belarus	Financial Monitoring Department of the State Control Committee of Belarus
Bermuda	Financial Intelligence Agency Bermuda
Canada	Financial Transactions and Reports Analysis Center of Canada
China	China Anti-Money Laundering Monitoring and Analysis Center
Croatia	Anti-Money Laundering Office
Cyprus	Cyprus Unit for Combating Money Laundering
Georgia	Financial Monitoring Service of Georgia
Iran	Iran Financial Intelligence Unit
Israel	Israel Money Laundering Prohibition Authority
Japan	Japan Financial Intelligence Center
Kazakhstan	Financial Monitoring Committee of the Ministry of Finance of the Republic of Kazakhstan
Kyrgyz Republic	State Financial Intelligence Service of the Government of the Kyrgyz Republic
Liechtenstein	Financial Intelligence Unit Liechtenstein
Macedonia	Macedonia Money Laundering Prevention Directorate
Moldova	Moldova Office for Prevention and Control of Money Laundering
Montenegro	Montenegro Administration for the Prevention of Money Laundering
Panama	Panama Financial Analysis Unit
Poland	Poland General Inspector of Financial Information
Romania	Romania National Office for the Prevention and Control of Money Laundering
Russian Federation	Russian Federation Service for Financial Monitoring
San Marino	San Marino Financial Intelligence Agency
Saudi Arabia	Saudi Arabia Financial Investigation Unit
Serbia	Serbian Administration for the Prevention of Money Laundering
South Africa	South Africa Financial Intelligence Center
Taiwan (China)	Taiwan Anti-Money Laundering Division
Tajikistan	Tajikistan Financial Monitoring Department of the National Bank of Tajikistan
Thailand	Thailand Anti-Money Laundering Office
Ukraine	Ukraine State Committee for Financial Monitoring of Ukraine (SCFM)
United Arab Emirates	United Arab Emirates Anti-money Laundering and Suspicious Cases Unit
United Kingdom	United Kingdom Serious Organized Crime Agency



### Trainings for the FMC, other CBA departments and AML/CFT competent authorities

Topic	Participants	Date
AML/CTF assessor qualification training, organized by the Council of Europe's MONEYVAL Committee	Representatives of the FMC, the General Prosecutor's Office and the Ministry of Justice	March 9-13
<i>"Organization of work of the banking system in the fight against laundering of proceeds of crime and terrorist financing: currency control"</i> , organized by the Central Bank of the Russian Federation	FMC staff member	March 24-26
<i>"Identification and investigation of crimes related to the legalization of proceeds generated through electronic money and virtual currencies"</i> , organized by the Regional Office for Central Asia of the UN Office on Drugs and Crime	FMC staff member	March 31-April 1
The third plenary session under the initiative <i>"Establishing and strengthening the network of prosecutors and central bodies from source, transit and destination countries in response to transnational organized crime in the Central Asia and the Caucasus region"</i> , organized by the Regional Office for Central Asia of the UN Office on Drugs and Crime	FMC staff members	July 23-25
Training seminar for country evaluation experts, organized by the Conference of the Parties established under the Council of Europe Warsaw Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism	FMC staff member	July 15-16
Conference on combating the financing of proliferation of weapons of mass destruction, organized by the US Department of State	Representatives of the FMC and the General Prosecutor's Office	July 22-23
<i>Seminar on "Risk-based approach: AML/CTF supervision for financial sector supervisors"</i> , organized by the International Monetary Fund	FMC staff member	August 24-28
Workshop on <i>"Contemporary challenges in AML/CTF"</i>	FMC and FSD staff members	October 1
International conference on <i>"Developing trends in combating corruption, money laundering and recovering criminal assets in Europe"</i>	FMC staff member	October 20-21
Short-term study program <i>"New Generation"</i> , organized by the CIS Federal Agency	FMC, FSRD and FSD staff members	November 9-13
Conference on <i>"Fighting the laundering of money generated through corruption"</i> , organized by the Polish Ministry of Finance	FMC staff members	November 17-18
Round table on <i>"Basic indicators of money laundering through the misuse of the Customs Union procedures, as well as through external economic activity in the CIS countries and Latvia"</i> (videoconference)	FMC staff members	November 20
Training course on <i>"International standards for risk management"</i> , organized by the Institute of Financial and Economic Security of the National Nuclear Research	FMC staff members	November 23-26



University of the Russian Federation (videoconference)		
Round table on <i>"Crypto-currencies and new payment methods"</i> , organized by the International Training and Methodological Center of the Russian Financial Monitoring Service (videoconference)	FMC staff members	November 27
Seminar on <i>"Current issues in the financing of terrorism and extremism"</i> , organized by the International Training and Methodological Center of the Russian Financial Monitoring Service (videoconference)	FMC staff members	December 3
Round table on <i>"Conducting national ML/TF risk assessments and implementing the risk-based approach: the study of international experience in the preparation of the concept for a national risk assessment"</i> (videoconference)	FMC staff members	December 11
Seminar on <i>"The risk-based approach as a mechanism to increase the efficiency of the AML/CTF system"</i> , organized by the Institute of Financial and Economic Security of the National Nuclear Research University of the Russian Federation (videoconference)	FMC and FSRD staff members	December 16-17
Round table on <i>"The organization of the activities related to strategic analysis at the FIUs of the Eurasian Group member countries"</i> , organized on the initiative of the FIU of Uzbekistan (videoconference)	FMC staff members	December 18





### **Training programs and events for reporting entities and their supervisory bodies**

<b>Topic</b>	<b>Participants</b>	<b>Date</b>
Armenian AML/CTF legislation, FATF Recommendations and other international instruments, outcomes of the National Assessment of ML/TF Risks in Armenia	Compliance staff of commercial banks and the representatives of the CBA FSD	January 29
Armenian AML/CTF legislation, FATF Recommendations and other international instruments, outcomes of the National Assessment of ML/TF Risks in Armenia	Compliance staff of credit organizations and pawnshops and the representatives of the CBA FSD	February 5
Armenian AML/CTF legislation, FATF Recommendations and other international instruments, outcomes of the National Assessment of ML/TF Risks in Armenia	Compliance staff of insurance (including reinsurance) companies, money transfer services and the representatives of the CBA FSD	February 12
Armenian AML/CTF legislation, FATF Recommendations and other international instruments, outcomes of the National Assessment of ML/TF Risks in Armenia	Compliance staff of the Central Depository of Armenia, investment companies, investment fund managers and the representatives of the CBA FSD	February 19
Seminar-workshop on the fight against ML/TF	Realtors, dealers in precious metals and precious stones	February 26
Seminar-workshop on the fight against ML/TF	Compliance staff of audit companies and the representatives of the Ministry of Finance	March 19
National and international instruments for combating ML/TF, outcomes of the National Assessment of ML/TF Risks in Armenia	Organizers of casino, games of chance, including internet games of chance, lotteries, and the representatives of the Inspectorate of Licensing Conditions and Requirements of the Ministry of Finance	April 2
National and international instruments for combating ML/TF, outcomes of the National Assessment of ML/TF Risks in Armenia	Compliance staff of currency dealers/brokers and the representatives of the CBA FSD	April 22
National and international instruments for combating ML/TF, outcomes of the National Assessment of ML/TF Risks in Armenia	Independent accountants and accounting firms, and the representatives of the Armenian Association of Accountants and Auditors	April 30
National and international instruments for combating ML/TF, outcomes of the National Assessment of ML/TF Risks in Armenia	Attorneys, independent lawyers and law firms	May 6
Specific features of the AML/CFT procedures within the reporting entities	Representatives of commercial banks	May 8