

**Cabinet of Ministers of Ukraine
Regulation**

**as of August 30, 2017, № 601-p
Kiev**

**On Implementing the Strategy of Development of the System for Prevention and Counteraction to
Legalization (Laundering) of Proceeds of Crime, Financing of Terrorism and Financing of
Proliferation of Weapons of Mass Destruction until 2020**

1. To approve the measures plan for 2017-2019 on Implementing the strategy of development of the system for prevention and counteraction to legalization (laundering) of proceeds of crime, financing of terrorism and financing of proliferation of weapons of mass destruction until 2020, that attached.

2. To add amendments to the order of the Cabinet of Ministers of Ukraine as of December 30, 2015, No. 1407 "On approval of the AML/CFT Strategy until 2020" (Ofitsiyni Visnyk Ukrainu, 2016, No. 3, Art. 198).

3. Ministries and other central executive authorities submit annually until January 10 and July 10 to the State Financial Monitoring Service information on the implementation of measures plan approved by this order for report submission to the Cabinet of Ministers of Ukraine every year till January 25 and July 25.

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| Prime Minister of Ukraine | Volodymyr Groysman |
| Ind. 67 | |

APPROVED
by the Regulation of the Cabinet of Ministers of Ukraine
of August 30, 2017 No. 601-r

ACTION PLAN

**for 2017-2019 on Implementing the Strategy of Development of the System for Prevention and Counteraction to Legalization (Laundering) of
Proceeds of Crime, Financing of Terrorism and Financing of Proliferation of Weapons of Mass Destruction until 2020**

| No. | Action item | Responsible | Deadline |
|-----|--|--|--|
| | <i>International cooperation and evaluation of the national system for prevention and counteraction to legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction</i> | | |
| 1. | Ensure performing by the Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL) of the 5th round of evaluation of the national system for counteraction to laundering (legalization) of proceeds of crime, financing of terrorism and financing of proliferation of weapons of mass destruction | State Financial Monitoring Service of Ukraine National Police Security Service of Ukraine (subject to consent) Prosecutor General's Office of Ukraine (subject to consent) State Fiscal Service National Anti-Corruption Bureau (subject to consent) Ministry of Finance Ministry of Justice Ministry of Economic Development and Trade Ministry of Infrastructure, National Securities and Stock Market Commission (subject to consent) National Commission for State Regulation of Financial Services Markets (subject to consent) National Bank of Ukraine (subject to consent) State Judicial Administration of Ukraine (subject to consent) Ministry of Foreign Affairs, Deposit Guarantee Fund (subject to consent) State Border Guard Service Administration | 2017 |
| 2. | Ensure submittal by Ukraine of the draft report of the Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL) on the 5th round of evaluation of the national system for counteraction to laundering (legalization) of proceeds of crime, financing of terrorism and financing of proliferation of weapons of mass destruction MONEYVAL | State Financial Monitoring Service of Ukraine Prosecutor General's Office of Ukraine (subject to consent) Security Service of Ukraine (subject to consent) National Police National Securities and Stock Market Commission (subject to consent) | National Bank (subject to consent) National Anti-Corruption Bureau of Ukraine (subject to consent) |

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| <p>3.</p> | <p>Ensure participation of Ukraine in international actions to prevent and counter legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction taken under the aegis of the Financial Action Task Force (FATF), European Union, Council of Europe, Organization for Security and Cooperation (OSCE), World Bank, International Monetary Fund in the framework of international organizations of universal nature, namely UN and its relevant departments, divisions, committees, as well as in the working committees of the Egmont Group, Eurasian Group for counteraction to legalization of criminal proceeds or financing of terrorism, law-enforcement and financial intelligence units of foreign states, etc.</p> | <p>State Financial Monitoring Service of Ukraine Ministry of Finance Ministry of Foreign Affairs Ministry of Justice Ministry of Internal Affairs National Police State Fiscal Service Ministry of Economic Development and Trade National Bank (subject to consent) Security Service of Ukraine (subject to consent) Prosecutor General's Office of Ukraine (subject to consent) National Anti-Corruption Bureau (subject to consent) National Securities and Stock Market Commission (subject to consent)</p> | <p>Continuously</p> |
| <p>4.</p> | <p>Ensure due preparation and conclusion of international agreements on counteraction to legalization (laundering) of proceeds of crime, financing of terrorism, financing of proliferation of weapons of mass destruction, and separatism</p> | <p>State Financial Monitoring Service of Ukraine Ministry of Foreign Affairs Ministry of Justice Ministry of Finance Ministry of Economic Development and Trade National Bank (subject to consent) Security Service of Ukraine (subject to consent) Ministry of Internal Affairs National Police Foreign Intelligence Service (subject to consent) State Fiscal Service</p> | <p>Continuously</p> |

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| | | Prosecutor General's Office (subject to consent) National Securities and Stock Market Commission (subject to consent) National Anti-Corruption Bureau (subject to consent) | |
| 5. | Exchange of information with the competent foreign agencies and international organizations to identify the methods, schemes, and mechanisms of legalization (laundering) of proceeds of crime and to document offenses in the foreign economic sphere | State Financial Monitoring Service of Ukraine Ministry of Finance Ministry of Foreign Affairs Ministry of Economic Development and Trade Ministry of Internal Affairs National Police State Fiscal Service National Bank (subject to consent) Security Service of Ukraine (subject to consent) Prosecutor General's Office of Ukraine (subject to consent) National Securities and Stock Market Commission (subject to consent) National Commission for State Regulation of Financial Services Markets (subject to consent) National Anti-Corruption Bureau (subject to consent) | As required |

Transparency of operation of the state authorities

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| 6. | Provide mass media coverage of the results of the actions taken by the state authorities to prevent and counter legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction | State Financial Monitoring Service of Ukraine Ministry of Finance Ministry of Justice Ministry of Economic and Trade Development Ministry of Infrastructure State Committee for Television and Radio Broadcasting National Bank (subject to consent) Security Service of Ukraine (subject to consent) National Securities and Stock Market Commission (subject to consent) National Commission for State Regulation of Financial Services Markets (subject to consent) | Continuously |
| 7. | Ensure access to public information per the procedure set forth in the Law of Ukraine "On Access to Public Information", specifically by publishing information on financial monitoring on the official web-sites of the state financial monitoring entities in the relevant information blocks | State Financial Monitoring Service of Ukraine Ministry of Finance Ministry of Justice Ministry of Economic Development and Trade Ministry of Infrastructure, National Bank (subject to consent) National Securities and Stock Market Commission (subject to consent) National Commission for State Regulation of Financial Services Markets (subject to consent) | Continuously |

Measures to prevent and/or mitigate the negative consequences of the risks in the system for prevention and counteraction to legalization (laundering) of proceeds of crime and financing of terrorism

Risk 1. Non-transparent funding of political parties

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| 8. | Exercise control over the operation of political parties in terms of compliance with the law-specified limitations on the funding of political parties | National Agency on Corruption Prevention | -"- |
| <i>Risk 2. Inadequate identification and sanctioning of suspicious financial transactions of the national politically exposed persons</i> | | | |
| 9. | Ensure monitoring of financial transactions whose participants include national politically exposed persons, their close and related persons | State Financial Monitoring Service of Ukraine | -"- |
| 10. | Establish close cooperation between the National Anti-Corruption Bureau of Ukraine and the State Financial Monitoring Service of Ukraine and implement efficient cooperation mechanisms | State Financial Monitoring Service National Anti-Corruption Bureau of Ukraine (subject to consent) | Quarter III of 2017 |
| <i>Risk 3. Inefficient measures to identify ultimate beneficial owners (controllors) and establish control over them</i> | | | |
| 11. | Develop tools to verify credibility of information provided by legal entities on the ultimate beneficial owners (controllors) | Ministry of Justice State Fiscal Service State Financial Monitoring Service of Ukraine | Quarter IV of 2017 |
| 12. | Develop proposals on increasing the liability for failure to submit, untimely submission, or submission of false information on the ultimate beneficial owners (controllors) during the registration procedures | Ministry of Justice | -"- |

Risk 4. Inappropriate identification and inappropriate elimination of the factors which contribute to the growing size of the shadow and off-shore financial system

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| 13. | Develop proposals on establishing, based on the information contained in the registers of promisors, of a unified state register of promissory notes drawn and ensure the state authorities' access to it | National Securities and Stock Market Commission (subject to consent) State Fiscal Service | Quarter I of 2018 |
| 14. | Develop proposals on amending the legislation to limit transactions on the sales of promissory notes by insurers | National Commission for State Regulation of Financial Services Markets (subject to consent) National Securities and Stock Market Commission (subject to consent) | -"- |
| 15. | Develop proposals on amending legislative acts to step up requirements for securities issuers | National Securities and Stock Market Commission (subject to consent) | -"- |
| 16. | Intensify cooperation with the OECD with the aim of subsequent accession to the organization and ensure active participation in the Global Forum on Transparency and Exchange of Information for Tax Purposes | State Fiscal Service Ministry of Foreign Affairs Ministry of Finance Ministry of Justice National Bank (subject to consent) National Securities and Stock Market Commission (subject to consent) | -"- |
| 17. | Ensure periodic updating of the Ukrainian offshore zone list based on the Global Forum on Transparency and Exchange of Information for Tax Purposes and OECD data | Ministry of Economic Development and Trade Ministry of Foreign Affairs | Continuously |
| 18. | Ensure, with the aim of counteraction to legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction in the foreign economic activities, prevention of unlawful money transfer abroad by business entities through offshore zones, checking availability of registration and operation of foreign counterparties through exchange of information with competent foreign authorities, and the use of international databases | State Fiscal Service National Police State Financial Monitoring Service of Ukraine Security Service of Ukraine (subject to consent) | -"- |
| <i>Risk 5. Low level of confidence in the financial system</i> | | | |
| 19. | Ensure harmonization of Ukraine's bank legislation with the provisions and standards of the European Union bank law in accordance with the Association Agreement between the European Union and the European Atomic Energy Community and their Member States, of the one part, and Ukraine, of the other part | National Bank of Ukraine (subject to consent) | Quarter IV of 2019 |
| 20. | Determine the sequence and priority of changes in bank regulation pursuant to the new international capital agreement (Basel III) based on the principles of dynamic provisioning, increase requirements for the qualitative and quantitative level of common equity, and determine criteria of the systemic importance of banks | -"- | -"- |
| <i>Risk 6. High level of cash circulation</i> | | | |
| 21. | Take actions to raise the population financial awareness level about payment cards | National Bank of Ukraine (subject to consent) | Continuously |
| 22. | Take actions to increase the level of population confidence in the bank system of Ukraine | -"- | Quarter IV of 2018 |
| 23. | Take actions to develop cashless transactions | -"- | Quarter II of 2018 |
| <i>Risk 7. Outflow of the financial capital from the country</i> | | | |
| 24. | Develop proposals on enhancing the efficiency of customs and currency control measures | State Fiscal Service National Bank of Ukraine (subject to consent) | Quarter I of 2018 |
| 25. | Take action to improve the investment climate in Ukraine | Ministry of Economic Development and Trade National Bank of Ukraine (subject to consent) | -"- |
| <i>Risk 8. Incomplete implementation in the national legislation of the provisions of Directive EU 2015/849 of the European Parliament and of the Council on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing</i> | | | |
| 26. | Prepare a draft law to implement in the legislation of Ukraine the provisions of the Directive EU 2015/849 of the European Parliament and of the Council on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing and Regulation EU 2015/847 of the European Parliament and of the Council on information accompanying transfers of funds, and support it in the Verkhovna Rada until adoption | Ministry of Finance State Financial Monitoring Service of Ukraine National Bank (subject to consent) Ministry of Justice Ministry of Economic Development and Trade Ministry of Infrastructure National Securities and Stock Market Commission (subject to consent) National Commission for State Regulation of Financial Services Markets (subject to consent) National Police State Fiscal Service Security Service of Ukraine (subject to consent) Prosecutor General's Office of Ukraine (subject to consent) National Anti-Corruption Bureau of Ukraine (subject to consent) | Quarter IV of 2017 |
| 27. | Bring Ukraine's legislation in line with the FATF recommendations in the case of changes to them | Ministry of Finance State Financial Monitoring Service of Ukraine | Continuously |

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| | | National Bank (subject to consent) Ministry of Justice, Ministry of Infrastructure Ministry of Economic Development and Trade National Securities and Stock Market Commission (subject to consent) National Commission for Regulation of Financial Services Markets (subject to consent) Ministry of Internal Affairs National Police State Fiscal Service Prosecutor General's Office of Ukraine (subject to consent) Security Service of Ukraine (subject to consent) National Anti-Corruption Bureau of Ukraine (subject to consent) | |
| 28. | Make coordinated proposals on the procedure for implementing the effective sanctions and restrictive measures imposed by the UN Security Council Resolutions | Ministry of Foreign Affairs Ministry of Justice Ministry of Finance State Financial Monitoring Service of Ukraine | Quarter IV of 2017 |
| <i>Risk 9. Growing organized crime</i> | | | |
| 29. | Ensure arrangement of meetings and training for the law enforcement agencies on detection and suppression of the activities of organized criminal groups | National Police State Fiscal Service Prosecutor General's Office of Ukraine (subject to consent) Security Service of Ukraine (subject to consent) National Anti-Corruption Bureau of Ukraine (subject to consent) | Continuously |
| 30. | Take measures to enhance the efficiency of law enforcement authorities interaction on combating organized crime, specifically cooperation with the newly established (including anti-corruption) law enforcement agencies | National Police State Fiscal Service Prosecutor General's Office of Ukraine (subject to consent), Security Service of Ukraine (subject to consent) National Anti-Corruption Bureau of Ukraine (subject to consent) | Continuously |
| <i>Risk 10. Acts of terrorism and separatism</i> | | | |
| 31. | Provide information to the State Financial Monitoring Service for compiling of the list of persons related to terrorist activities or to whom international sanctions were applied | Ministry of Foreign Affairs Security Service of Ukraine (subject to consent) | -"- |
| <i>Risk 11. Insufficiently efficient actions by competent authorities to counter financing of terrorism and separatism</i> | | | |
| 32. | Exercise supervision on prevention and counteraction to legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction over the activities of payment systems and their participants, postal operators (on their money transfer activities) | Ministry of Infrastructure National Bank (subject to consent) | -"- |
| 33. | Take effective measure to identify and liquidate financing of terrorism channels | Security Service of Ukraine (subject to consent) State Fiscal Service State Financial Monitoring Service of Ukraine National Security and Defense Council of Ukraine Apparatus (subject to consent) | -"- |
| 34. | Ensure monitoring of information from the Internet to identify the persons who use their accounts to raise charity and assist terrorist and separatist groups and impose limitations on the accounts of persons related to financial of separatism | State Financial Monitoring Service of Ukraine Security Service of Ukraine (subject to consent) | -"- |
| 35. | Ensure identification of facts of providing financial support by representatives of international terrorist and extremist organizations to their supporters in Ukraine, including through legalized proceeds of crime | National Police Security Service of Ukraine (subject to consent) Foreign Intelligence Service (subject to consent) State Fiscal Service Prosecutor General's Office of Ukraine (subject to consent) | Continuously |
| 36. | Ensure identification of facts of financing the operation of the Islamic State terrorist organization through affiliated persons with the aim of taking action to block them and make it impossible for the said persons to use the financial system of Ukraine | National Police Security Service of Ukraine (subject to consent) Foreign Intelligence Service (subject to consent) State Financial Monitoring of Ukraine Service State Fiscal Service | -"- |
| 37. | Ensure identification of smuggling operations, illegal migration channels, terrorist activities, movement through the customs border and transit through Ukraine of narcotic substances, psychotropic substances, their counterparts or precursors to preclude gaining of criminal proceeds | State Fiscal Service National Police Security Service of Ukraine (subject to consent) State Border Guard Service Administration State Financial Monitoring Service of Ukraine | -"- |

Risk 12. Non-compliance of the SFMSU Training and Methodical Center's organizational and legal form with the requirements of the Law

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| 38. | Reorganize the SFMSU Training and Methodical Center into the Financial Monitoring Academy | State Financial Monitoring Service of Ukraine Ministry of Finance | Quarter IV of 2017 |
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Risk 13. Insufficient training level of the participants of the system for prevention and counteraction to legalization (laundering) of proceeds of crime, financing of terrorism and financing of proliferation of weapons of mass destruction

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| 39. | Ensure timely training of the responsible employees of the reporting entities, as well as of the employees involved in conducting financial monitoring | State Financial Monitoring Service of Ukraine Ministry of Finance Ministry of Justice Ministry of Infrastructure Ministry of Economic Development and Trade National Securities and Stock Market Commission (subject to consent) National Commission for State Regulation of Financial Services Markets (subject to consent) | Continuously |
| 40. | Continue the practice of participation of court representatives in meetings, workshops, conferences on prevention and counteraction to legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction | State Financial Monitoring Service of Ukraine State Judicial Administration (subject to consent) High Specialized Court of Ukraine for Civil and Criminal Cases/Criminal Court of Cassation of the Supreme Court (subject to consent) | Continuously |
| 41. | Summarize the court practice of reviewing cases under Articles 209, 306, 258-258 ⁵ of the Criminal Code of Ukraine | High Specialized Court of Ukraine for Civil and Criminal Cases/Criminal Court of Cassation of the Supreme Court (subject to consent) | “-” |
| 42. | Ensure organization of joint training of the law enforcement authorities to exchange experience on investigating cases related to legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction | National Police State Fiscal Service Prosecutor General's Office of Ukraine (subject to consent) Security Service of Ukraine (subject to consent) National Anti-Corruption Bureau of Ukraine (subject to consent) State Financial Monitoring Service of Ukraine | “-” |
| 43. | Ensure involvement of the primary financial monitoring subjects and self-regulatory organizations in review of the issues related to the functioning of the system for preventing and countering legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction by holding joint meetings, seminars, round table meetings, conferences, etc. | State Financial Monitoring Service of Ukraine Ministry of Finance Ministry of Justice Ministry of Economic Development and Trade Ministry of Infrastructure National Bank (subject to consent) National Securities and Stock Market Commission (subject to consent) National Commission for State Regulation of Financial Services Markets (subject to consent) | “-” |

Risk 14. Insufficient material and technical support of the SFMS

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| 44. | Ensure funding for operation of a unified state information system on prevention and counteraction to legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction | Ministry of Finance State Financial Monitoring Service of Ukraine | Continuously |
| 45. | Ensure development of a unified state information system on prevention and counteraction to legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction. | State Financial Monitoring Service of Ukraine Ministry of Finance | “-” |

Risk 15. Low salary of the SFMSU staff

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| 46. | Eliminate disproportion in the salary of the SFMS's staff and other state authorities involved in counteraction to legalization (laundering) of proceeds of crime and financing of terrorism, and in the anti-corruption activities | “-” | Quarter I of 2018 |
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Risk 16. Inefficient system of initial detection of suspicious financial transactions

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| 47. | Ensure that the reporting entities use a risk-based approach during analysis and identification of clients' financial transactions and submit information about them to the SFMS | Ministry of Finance State Financial Monitoring Service of Ukraine National Bank (subject to consent) Ministry of Justice Ministry of Infrastructure Ministry of Economic Development and Trade National Securities and Stock Market Commission (subject to consent) National Commission for Regulation of Financial Services Markets (subject to consent) | Quarter II of 2018 |
| 48. | Develop proposals to formulate a clear list of civil service positions, holding which automatically refers a person to the category of the national politically exposed person (enhancing the role of the National Agency of Ukraine on Civil Service in this issue) | National Agency on Civil Service National Agency on Corruption Prevention | Quarter IV of 2017 |

Risk 17. Outdated (inefficient) suspicious financial transaction information analysis system

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| 49. | Ensure the required actions to implement the program "Upgrading the information system on prevention and counteraction to legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction" | State Financial Monitoring Service of Ukraine | 2nd half of 2017 |
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Risk 18. Inefficient system of investigation of materials by the SFMS

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| 50. | Analyze the status of consideration by the law enforcement authorities of the SFMS's case referrals to eliminate deficiencies in the investigation and develop preventive actions to preclude them in future | National Police State Fiscal Service Prosecutor General's Office of Ukraine (subject to consent) Security Service of Ukraine (subject to consent) National Anti-Corruption Bureau of Ukraine (subject to consent) State Financial Monitoring Service of Ukraine | Quarter IV of 2017 |
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Risk 19. Inefficient sanctions for breaches of legislation on prevention and counteraction to legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction

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| 51. | Improve the procedure of applying penalties to the reporting entities following audits for compliance with the legislation on prevention and counteraction to legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction | State Financial Monitoring Service of Ukraine Ministry of Finance National Bank (subject to consent) Ministry of Justice Ministry of Infrastructure, Ministry of Economic Development and Trade National Securities and Stock Market Commission (subject to consent) National Commission for State Regulation of Financial Services Markets (subject to consent) | Continuously |
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Risk 20. Insufficient staff and resources for efficient supervision

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| 52. | Increase the number of the state financial monitoring entities' staff involved in supervision over the reporting entities on prevention and counteraction to legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction | State Financial Monitoring Service of Ukraine Ministry of Finance Ministry of Justice Ministry of Infrastructure Ministry of Economic Development and Trade National Securities and Stock Market Commission (subject to consent) National Commission for State Regulation of Financial Services Markets (subject to consent) | Quarter IV of 2017 |
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Risk 21. Absence of sectoral risk assessment of the reporting entities in the sphere of prevention and counteraction to legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction

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| 53. | Conduction by the state financial monitoring entities of assessment of risks of using the reporting entities for legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction, and its use during the planning of the reporting entities' audits for compliance with the legislation on prevention and counteraction to legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction | State Financial Monitoring Service of Ukraine Ministry of Finance National Bank (subject to consent) Ministry of Justice Ministry of Infrastructure Ministry of Economic Development and Trade National Securities and Stock Market Commission (subject to consent) National Commission for State Regulation of Financial Services Markets (subject to consent) | Quarter I of 2019 |
| 54. | Develop and adopt a regulatory legal act to implement the risk-based approach for supervision in the sphere of prevention and counteraction to legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction | Ministry of Economic Development and Trade | Quarter IV of 2017 |

Risk 22. Insufficient interaction between the law enforcement authorities and the SFMS

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| 55. | Establish an efficient system of feedback between the law enforcement authorities and the SFMS on the results of the consideration by the law enforcement authorities of case referrals through ensuring control and accounting of the status of the case referrals' consideration and ensuring timely exchange of relevant information | National Police State Fiscal Service Prosecutor General's Office of Ukraine (subject to consent) Security Service of Ukraine (subject to consent) National Anti-Corruption Bureau of Ukraine (subject to consent) State Financial Monitoring Service of Ukraine | Quarter IV of 2017 |
| 56. | Ensure close cooperation between the SFMS and the law enforcement authorities during suspension of financial transactions | State Financial Monitoring Service of Ukraine National Police State Fiscal Service | Continuously |

Prosecutor General's Office of Ukraine (subject to consent)
Security Service of Ukraine (subject to consent)
National Anti-Corruption Bureau of Ukraine (subject to consent)

Risk 23. Inefficient investigation of crimes related to legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction

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| 57. | Develop guidelines on investigation of crimes related to legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction | Prosecutor General's Office of Ukraine (subject to consent) National Police State Fiscal Service Security Service of Ukraine (subject to consent) National Anti-Corruption Bureau of Ukraine (subject to consent) | Quarter IV of 2018 |
| 58. | Introduce reporting by the law enforcement authorities on the accounting of criminal offenses and criminal cases under Articles 209, 306, 258-258 ⁵ , 439, 440 of the Criminal Code of Ukraine | Prosecutor General's Office of Ukraine (subject to consent) National Police State Fiscal Service Security Service of Ukraine (subject to consent) National Anti-Corruption Bureau of Ukraine (subject to consent) State Financial Monitoring Service of Ukraine | Quarter I of 2018 |
| 59. | Enhance the efficiency of the actions by the law enforcement system of recovery to Ukraine of the assets blocked abroad | National Police State Fiscal Service Prosecutor General's Office of Ukraine (subject to consent) Security Service of Ukraine (subject to consent) National Anti-Corruption Bureau of Ukraine (subject to consent) National Agency for Detection, Search, and Management of Proceeds of Corruption and Other Crimes | Continuously |
| 60. | Ensure detection and prevention of the illegal activities of "conversion centers" and enterprises with attributes of fictitiousness involved in the legalization (laundering) of proceeds of crime or financing of terrorism, or financing of proliferation of weapons of mass destruction | State Fiscal Service National Police State Financial Monitoring Service of Ukraine Security Service of Ukraine (subject to consent) National Securities and Stock Market Commission (subject to consent) | c |
| 61. | Ensure, within the limits of authority, detection of facts of concealing or masking the illegal nature of proceeds, determining their sources of origin, location, and establishing the methods of transfer, areas of use (specifically for entrepreneurship, investment, other economic and charity activities, payments and loan transactions), as well as to search, arrest, and confiscate such proceeds | State Financial Monitoring Service of Ukraine National Police State Fiscal Service Security Service of Ukraine (subject to consent) Prosecutor General's Office of Ukraine (subject to consent) National Anti-Corruption Bureau (subject to consent). National Agency for Detection, Search, and Management of Proceeds of Corruption and Other Crimes | "- |
| 62. | Ensure detecting the facts of moving commodities, cash and cashless resources, negotiable instruments, other currency values, cultural values, precious metals and precious stones and products thereof which may be related to legalization (laundering) of proceeds of crime, financing of terrorism, or financing of proliferation of weapons of mass destruction | State Fiscal Service State Border Guard Service Administration | Continuously |

Risk 24. Inefficient investigation of criminal offenses related to organized crime

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| 63. | Ensure strengthening of the interaction between the law enforcement authorities on combating organized crime | Ministry of Internal Affairs National Police State Fiscal Service Prosecutor General's Office of Ukraine (subject to consent) Security Service of Ukraine (subject to consent) National Anti-Corruption Bureau of Ukraine (subject to consent) | Quarter IV of 2017 |
| 64. | Improve and enhance measures to neutralize the factors which condition the activities of organized criminal groups | "- | "- |
| 65. | Strengthening international cooperation on combating transnational organized crime | "-Bureau of Ukraine (subject to consent) | "- |
| 66. | Organize system-based countering of organized economic crime and shadowing of economy through consolidation of institutional capacity of financial, tax, customs, and law enforcement authorities, identification and confiscation of the assets of organized criminal groups | Ministry of Internal Affairs National Police State Fiscal Service Prosecutor General's Office of Ukraine (subject to consent), Security Service of Ukraine (subject to consent) National Anti-Corruption Bureau of Ukraine (subject to consent) State Financial Monitoring Service of Ukraine | Continuously |

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| | | National Security and Defense Council of Ukraine Apparatus (subject to consent) | |
| | | National Police State Fiscal Service Prosecutor General's Office of Ukraine (subject to consent) Security Service of Ukraine (subject to consent) | |
| 67. | Development and implementation of the mechanism for monitoring and summarizing of the status of the cross-border and transnational organized crime, including a periodic assessment of its influence on the socio-political and socio-economic processes in the country in general and in its regions | National Anti-Corruption Bureau of Ukraine (subject to consent) National Security and Defense Council of Ukraine Administration (subject to consent) | Quarter I of 2018 |
| | | National Police State Fiscal Service Security Service of Ukraine (subject to consent) Prosecutor General's Office of Ukraine (subject to consent) National Anti-Corruption Bureau of Ukraine (subject to consent) | |
| 68. | Taking operative and search actions to identify and suppress the operation of organized groups or criminal organizations which perform transactions on legalization (laundering) of proceeds of crime as well as conduction of pre-trial investigations by the law enforcement authorities of the criminal cases on the offenses related to legalization (laundering) of proceeds of crime, including offences under Articles 209 and 209 ¹ of the Criminal Code of Ukraine | | Continuously |
| <i>Risk 25. Inefficient investigation into tax crimes</i> | | | |
| | | State Fiscal Service Security Service of Ukraine (subject to consent) National Police Prosecutor General's Office of Ukraine (subject to consent) National Anti-Corruption Bureau of Ukraine (subject to consent) | |
| 69. | Enhance the efficiency of interaction of the State Fiscal Service with other law enforcement authorities | | Quarter I of 2018 |
| | | State Fiscal Service | -" |
| 70. | Develop proposals on amending the Criminal Code of Ukraine on the application of Article 212 of the Criminal Code of Ukraine | | |
| <i>Risk 26. Inefficient investigation into terrorist offences</i> | | | |
| | | National Police Security Service of Ukraine (subject to consent) State Fiscal Service State Financial Monitoring Service of Ukraine Prosecutor General's Office of Ukraine (subject to consent) State Audit Service | |
| 71. | Strengthen measures to detect financial transactions and criminally prosecute persons related to financing of terrorism | | Continuously |
| | | Security Service of Ukraine (subject to consent) National Police State Fiscal Service Prosecutor General's Office of Ukraine (subject to consent) State Financial Monitoring Service of Ukraine | |
| 72. | Strengthen interagency coordination on detection and subsequent freezing of the assets of the persons involved in financing of terrorism and proliferation of weapons of mass destruction, including those that use the non-profit sector | | Quarter I of 2018 |
| | | Ministry of Internal Affairs Security Service of Ukraine (subject to consent) National Police State Fiscal Service Prosecutor General's Office of Ukraine (subject to consent) | |
| 73. | Performance of efficient interaction and information exchange between competent foreign agencies and international organizations involved in prevention and counteraction to terrorism and its financing | | Continuously |
| <i>Risk 27. Inefficient investigation into predicate offences related to legalization (laundering) of proceeds of crime</i> | | | |
| | | National Police Security Service of Ukraine (subject to consent) State Fiscal Service Prosecutor General's Office of Ukraine (subject to consent) National Anti-Corruption Bureau (subject to consent) | |
| 74. | Enhance the efficiency of investigation by the law enforcement authorities of the predicate offences related to laundering of criminal proceeds, including building an efficient evidential database | | Quarter I of 2018 |
| | | State Fiscal Service, National Police, Security Service of Ukraine (subject to consent), State Financial Monitoring Service, National Securities and Stock Market Commission (subject to consent), State Border Guard Service Administration | |
| 75. | Ensure taking measures aimed at detecting the facts of human trafficking or other illegal contracts in relation to the human being, illegal trafficking in weapons, drugs, excise goods, discs for laser reading systems, gambling, using insider information, stock market manipulations | | Continuously |
| | | National Anti-Corruption Bureau (subject to consent) National Bank (subject to consent) | |
| 76. | Ensure normative and legal regulation to implement a unified format of information exchange and mechanism of electronic interaction between the National Anti-Corruption Bureau of Ukraine and banks on search and identifying criminal proceeds | | Quarter I of 2018 |
| <i>Risk 28. Inconsistency between the punishment and the severity of the offences related to legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction</i> | | | |
| | | Ministry of Justice State Judicial Administration (subject to consent) | |
| 77. | Develop proposals to implement dedicated court statistics on application of confiscation (special confiscation) | | Quarter IV of 2017 |

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|-----|--|---|--------------------|
| | | High Specialized Court of Ukraine for Civil and Criminal Cases (subject to consent) | |
| 78. | Take actions to summarize court practices in the cases on legalization (laundering) of criminal proceeds and financing of terrorism, and provide relevant recommendations to judges | High Specialized Court of Ukraine for Civil and Criminal Cases (subject to consent) | Quarter I of 2018 |
| | <i>Risk 29. Legalization (laundering) of proceeds of crime and financing of terrorism through remote services</i> | | |
| 79. | Develop recommendations for the reporting entities to minimize the risks during their provision of remote services | National Bank (subject to consent) State Financial Monitoring Service of Ukraine National Securities and Stock Market Commission (subject to consent) | Quarter IV of 2017 |
| 80. | Conduction of control over the application of security systems when using remote services with due regard for protection from possible offenders' attacks | National Bank (subject to consent) State Financial Monitoring Service of Ukraine National Securities and Stock Market Commission (subject to consent) | Continuously |
| 81. | Ensure identification of crimes related to computer systems and data (cybercrimes) and preventing legalization (laundering) of proceeds of such crimes | National Police Security Service of Ukraine (subject to consent) State Financial Monitoring Service of Ukraine | -"- |
| | <i>Risk 30. Insufficient level of understanding of the risks of legalization (laundering) of proceeds of crime</i> | | |
| 82. | Ensure summarizing of information on the identified schemes of legalization (laundering) of proceeds of crime, taking into account the experience gained by competent foreign authorities, financial, regulatory, and law enforcement authorities of Ukraine to be used for prevention of the said crimes and bring it to the attention of the primary financial monitoring subjects by posting it on the official SFMS's web-site | State Financial Monitoring Service of Ukraine National Bank (subject to consent) Ministry of Economic Development and Trade Ministry of Infrastructure Ministry of Justice Ministry of Finance Ministry of Foreign Affairs National Police State Fiscal Service State Audit Service Security Service of Ukraine (subject to consent) National Securities and Stock Market Commission (subject to consent) National Commission for State Regulation of Financial Services Markets (subject to consent) Foreign Intelligence Service (subject to consent) National Anti-Corruption Bureau (subject to consent) Prosecutor General's Office of Ukraine (subject to consent) | Annually |
| | <i>Risk 31. Failure of the DNFBPs to submit information on suspicious financial transactions</i> | | |
| 83. | Continue development and publication of guidelines for representatives of the DNFBPs on the standards of reporting about suspicious financial transactions | Ministry of Finance State Financial Monitoring Service of Ukraine Ministry of Justice | Continuously |
| | <i>Risk 32. Absence of legal regulation of the operation of some representatives of the DNFBPs</i> | | |
| 84. | Develop the draft Law of Ukraine "On Realtor Activities" and ensure its support in the Verkhovna Rada of Ukraine till its adoption | Ministry of Economic Development and Trade State Financial Monitoring Service of Ukraine Ministry of Justice Ministry of Finance | Quarter II of 2018 |
| 85. | Develop proposals to determine clear criteria of professional intermediary operation on the real estate market | Ministry of Economic Development and Trade State Financial Monitoring Service of Ukraine Ministry of Finance | -"- |
| | <i>Risk 33. Legalization (laundering) of proceeds of crime and financing of terrorism through gambling</i> | | |
| 86. | Continue activities to prevent, detect, suppress, and prosecute the persons involved in the forbidden gambling business in Ukraine | National Police Security Service of Ukraine (subject to consent) State Fiscal Service Prosecutor General's Office of Ukraine (subject to consent) | Continuously |
| | <i>Risk 34. Use of non-profit organizations for legalization (laundering) of proceeds of crime and financing of terrorism</i> | | |
| 87. | Ensure strengthening of measures to detect non-profit organizations' financial transactions and criminally prosecute persons related to financing of terrorism and actions committed aimed at a violent change or overthrow of the constitutional order or capturing the state power, a change in the boundaries of the territory or state border | National Police Security Service of Ukraine (subject to consent) State Fiscal Service Prosecutor General's Office of Ukraine (subject to consent) State | -"- |

Financial Monitoring Service of
Ukraine
Ministry of Justice

National Police
Security Service of Ukraine
(subject to consent)
State Fiscal Service
Prosecutor General's Office of
Ukraine (subject to consent)
Ministry of Justice
State Financial Monitoring Service
of Ukraine

88. Perform sectoral risk assessment of using non-profit (non-governmental) organizations for legalization (laundering) of proceeds of crime, financing of terrorism, and financing of proliferation of weapons of mass destruction

2nd half of 2019