

What Standard Setters Say Recommendation 31 (proposed 32)

- ✓ All relevant authorities should cooperate and coordinate (where appropriate) domestically with each other;
- ✓ Levels include policy making and operational;
- ✓ Subject – development and implementation of policy and activities.



Domestic Cooperation in Ukraine: General Implementation

- ✓ Policy level – Annual Action Plan approved by the Cabinet and the Central Bank;
- ✓ Implementation of policy - Inter-agency working group on typologies and related issues (includes state agencies, judiciary representative and private sector associations);
- ✓ Coordination between regulators and the FIU (all AML/CFT regulations are prepared with the consent of the FIU).

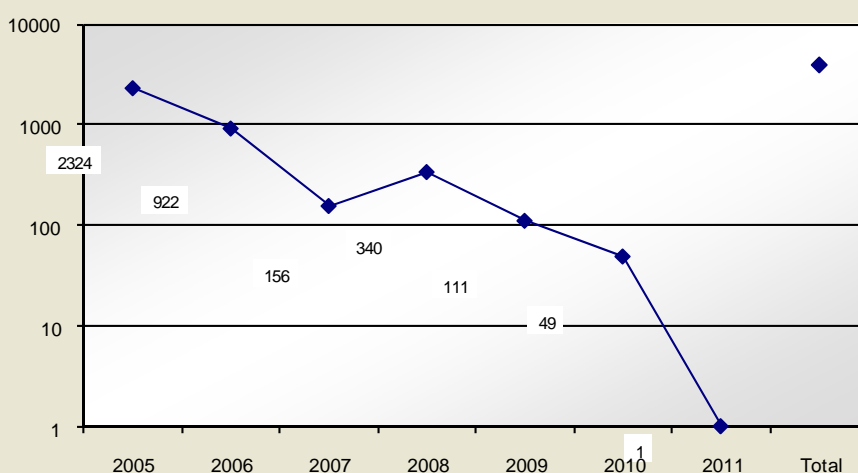


Domestic Cooperation in Ukraine: Central Bank and FIU

- ✓ The FIU uses the Central Bank e-mail system and cryptographic software for electronic information exchange with banks;
- ✓ The Central Bank and the FIU conduct information exchange on a basis of an MOU;
- ✓ Interaction in cases of possible non-compliance by banks, detected by the FIU.



Verifying Information of the FIU Concerning Possible Non-compliance

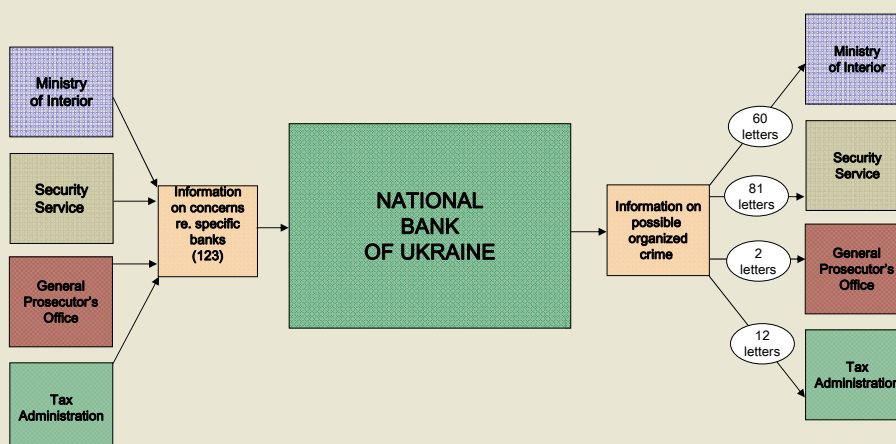


Domestic Cooperation in Ukraine: Central Bank and Law Enforcement

- ✓ Law enforcement agencies inform the Central Bank on investigated cases that may require supervisory action;
- ✓ The Central Bank independently informs the law enforcement agencies on suspicion regarding possible organized criminal activities of bank customers.



Cooperation between the National Bank of Ukraine and the law enforcement authorities of Ukraine, during 2008-2011 (as of 01.10.2011)



Some Conclusions

- ✓ 3-D Regime: Domestic cooperation should be effective on three levels and between these levels: executive branch and central bank (between all agencies), reporting agencies and judiciary;
- ✓ Coordination between the regulators and the FIU can result in increasing efficiency of AML/CFT regulatory regime.

