



ISTITUTO PER LA VIGILANZA
SULLE ASSICURAZIONI

IVASS



Summer School on Terrorism and Human Rights 2018

Siena 27 luglio 2018

Cooperation between financial authorities on CFT

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** The views expressed are strictly personal*



THE BIRTH OF FINANCIAL MEASURES AGAINST TERRORISM .1

- New York UN convention of 9th December 1999 (rat. in Italy by Law n. 7/2003): suppression of international terrorism by financial measures + extension of AML policy (cfr. artt. 8 e 18) ;
- Various UN resolutions (from 2011 to 2017): funds and financial resources freezing of entities included in the black list; transparency and guarantee in listing's and delisting's procedures; blocking money flows resulting from kidnappings, oil trading and trafficking of archaeological heritage;
- UN Res. 2322/2016 e 2341/2017 (cfr. par. 1, 4 e 10): exchanges of information and cooperation between States and authorities;
- FATF - Financial Action Task Force: 2001 → extension of powers to CFT ; set di 9 recommendations CFT (today rec. da 5 a 8 Sez. C) Rec.) → guidelines to implement UN resol.; regulatory standards on money transfer, cross-border credit transfers, cash transfers and activities of non profit organizations



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THE BIRTH OF FINANCIAL MEASURES AGAINST TERRORISM .2

- **EU law**: Various common foreign and security policy positions e EU Regulations containing the entities included in the UN black list; Reg. 2017/541/UE (criminal measures); Dir. 2005/60/UE (the Third money laundering Directive) → integrations policy AML and CFT → both are threats to the integrity of the financial market;
- **Italian Law**: l. n. 431/2001 created CSF (Financial Security Committee) to implement financial measures against terrorism and to encourage cooperation between investigative authorities → Decree n. 109/2007 → coordination of national provisions on CFT : law enforcement based both on measures of freezing and on reports of suspicious transactions, integration with Decree n. 231/2007 (AML Law) .



THE SUBSTANTIVE REASONS OF THE CURRENT LEGAL FRAMEWORK

FINANCIAL APPROACH ON THE FIGHT AGAINST TERRORISM

MARKETS INTEGRITY

(Flows of illicit money can damage the integrity, stability and reputation of the financial sector)

EFFORT OF FIGHT

AML/CFT AND PRUDENCIAL SUPERVISION ARE RELATED AND COMPLEMENTARY
(att. 2 Decr. n. 109/2007 and 2 Decr. n. 231/2007 - AML Law)

**AMMINISTRATIVE NATURE
OF THE ITALIAN FIU,
OPERATING WITHIN THE BANK OF ITALY**

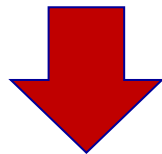
**ROLE OF PRUDENCIAL SUPERVISORY
ON CFT**



CFT  **AML**

AML (ART. 2, CO 4 E 5 DECR. N. 231/2007 – AML LAW) → THE MONEY LAUNDERER INTRODUCES ILLICIT ECONOMIC-FINANCIAL RESOURCES IN THE LEGAL ECONOMY, EXPLOITING THE FINANCIAL CIRCUITS.

CFT (ART. 1, LETT. A) D. LGS N. 109/2007) →: WHO FINANCES THE TERRORISM MAKES LAWFUL ACTIVITIES, IN WHICH ONLY THE DESTINATION OF THE FUNDS AND THEREFORE THE FINAL ACT HAS ILLICIT NATURE.



IN BOTH CASES:

- **THEY USE THE FINANCIAL MARKET;**
- **EFFECTIVE DETECTION REQUIRES ACQUISITION AND ANALYSIS OF BEHAVIORS, SUBJECTS AND SITUATIONS;**
- **THE SYSTEMS OF ANALYSIS AND TRACING OF INTERMEDIARIES ARE VERY IMPORTANT.**



COOPERATION FORMS BETWEEN FINANCIAL AUTHORITIES ON AML/CFT:

- **INDIRECT COOPERATION AT SUPRANATIONAL LEVEL;**
- **INDIRECT COOPERATION AT NATIONAL LEVEL;**
- **"INSTRUMENTAL" AND HORIZONTAL COOPERATION AT NATIONAL LEVEL;**
- **DIRECT COOPERATION AT EU LEVEL;**
- **DIRECT COOPERATION AT SUPRANATIONAL LEVEL.**



INDIRECT COOPERATION AT SUPRANATIONAL LEVEL (EXTRA UE):

- **PARTICIPATION OF INTERNATIONAL AND INTER-GOVERNMENTAL ORGANIZATIONS → the authorities (and Italian FIU) can participate in the Italian delegation led by the Ministry of Economy, in defining technical measures and policies CFT.**

FOR EXAMPLE

- **GAFI** (FATF - Financial Action Task Force) →

A) INTEGRATED STRATEGY → 2016 STRATEGY FOR CFT + OPERATIONAL PLAN

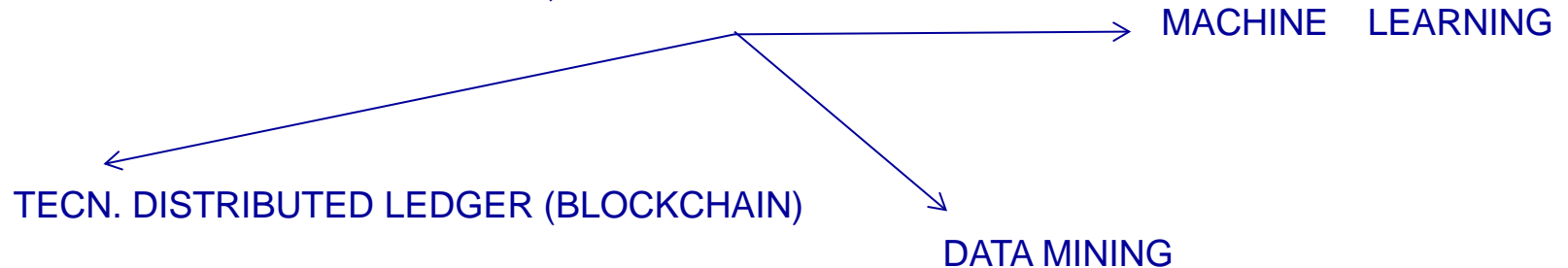
- investigations on the ways of financing terrorism;
- analysis on the risks connected to ISIL;
- measures on non-profit organizations;
- lower thresholds for the application of proportionate checks;
- checks relating to cash and funds transfers;
- lower cooperation between national and international authorities, removing obstacles that limit the exchange of information between FIUs;

B) MUTUAL EVALUATION (2013 NEW METODOLOGY) TECHNICAL COMPLIANCE+ EFFECTIVENESS → FOLLOW UP: ON 10 FEBRUARY 2016 WAS APPROVED REPORT ON ITALIAN SYSTEM;



INDIRECT COOPERATION AT SUPRANATIONAL LEVEL (EXTRA UE):

C) SPECIALIZED WORKING GROUPS (2015 - GUIDANCE FOR A RISK BASED APPROACH TO VIRTUAL CURRENCIES; 2015 – BEST PRACTICES ON COMBATTING THE ABUSE OF NON PROFIT ORGANISATIONS; 2017 – ANALYSIS ON FINTECH E REGTECH →



➤ **GRUPPO EGMONT** → 150 FIU

A) DEVELOPMENT ESW;

B) COLLABORATION AND EXCHANGE OF INFORMATION (2015 - FINANCIAL ANALYSIS ON VIRTUAL MONEYS; 2015 - COOPERATION AND IMPACT OF THE PRIOR CONSENT RULE);

C) COMMON STANDARDS AND PRACTICES (2017 CHARACTERISTICS OF AUTONOMY AND INDEPENDENCE FIU);

D) ISIL PROJECT (2015-2016 SPECIFIC CLUSTERS, PREVENTIVE INTELLIGENCE THROUGH ESW).



INDIRECT COOPERATION AT SUPRANATIONAL LEVEL (EU):

European Financial Supervisory Authorities (IV e V DIR. AML):

- RECEIVE SRA (SUPRANATIONAL RISK ASSESSMENT) AND NRA (NATIONAL RISK ASSESSMENT) FOR COMPREHENDING RISKS;
- BIENNIAL OPINION ON THE RISKS OF MONEY LAUNDERING AND TERRORIST FINANCING IN THE FINANCIAL MARKET;
- GUIDELINES ON RISK FACTORS → JC N. 37/2017 → PROMOTION OF THE COMMON RISK COMPREHENSION → COINCIDENCE MEASURES AML FOR CFT;
- GUIDELINES ON THE CHARACTERISTICS OF A RISK-BASED APPROACH TO SUPERVISION AND THE PROVISIONS TO BE ADOPTED FOR RISK-BASED SUPERVISION.



INDIRECT COOPERATION AT SUPRANATIONAL LEVEL (EU):

- **EXPERT GROUP ON MONEY LAUNDERING AND TERRORIST FINANCING;**
- **PLATFORM UE FIU → IMPROVING COLLABORATION FORMS (JOINT ANALYSIS AUTOMATIC SUSPICIOUS TRANSACTIONS CROSS BORDER REPORTS; MAPPING EXERCISE AND GAP ANALYSIS ON FIU'S POWERS AND OBSTACLES FOR OBTAINING AND EXCHANGING INFORMATION (C. D. MAPPING EXERCISE));**



INDIRECT COOPERATION AT NATIONAL LEVEL:

- THE SECTORAL SUPERVISORY FINANCIAL AUTHORITIES PARTICIPATE TO THE CSF FOR CFT FUNCTIONS (ARTICLES 3, C. 3, 7 AND 10, 4-QUINQUIES DECR. N. 109/2007 AND ARTICLE 4, PARAGRAPH 4 AND 5 DECR N. 231 / 2007): NOTWITHSTANDING THE RULES OF PROFESSIONAL SECRECY, SEND INFORMATION:
 - ELABORATION OF CFT STRATEGIES AND COORDINATION OF MEASURES TO LIMIT THE RELATED RISK;
 - APPROVAL OF NATIONAL RISK ASSESSMENT (LAST NRA WAS MADE IN 2014);
 - PROPOSAL FOR D. M. TEMPORARY RESOURCES AND FUNDS FREEZING FOR SUBJECTS WHO COMMIT OR TRY TO COMMIT CRIMES RELATED TO TERRORISM;
 - IMPLEMENTATION OF UN-EU FREEZING MEASURES;
 - MOTIVATED PROPOSAL FOR LISTING AND DELISTING;
 - CONSULTATIVE FUNCTIONS, "NETWORKS OF EXPERTS" AND COMMITTEES.



"INSTRUMENTAL" AND HORIZONTAL COOPERATION AT NATIONAL LEVEL:

➤ **ITALIAN FIU (CFR. EGMONT definition and Article 2 dec. 2000/642 / GAI) :**

It is the central, national unit which, in order to AML/CFT, is responsible for receiving (and to the extent permitted, requesting), analyzing and disseminating to the competent authorities, disclosures of financial information which concern suspected proceeds of crime or are required by national legislation or regulation.

- analysis of financial flows;
- cooperation in EU and non-EU;
- reception of "objective" communications and related regulatory powers;
- temporary freezing of suspicious transactions at the request of the Finance Police Unit, Antimafia Bureau, judicial authorities, or on its own initiative;
- inspection powers;
- Promotion of active cooperation (The Unit draws up regulations on the filing of suspicious transactions reports and on the transmission of aggregate data by financial intermediaries. It promotes active cooperation by concerned entities and facilitates the identification of suspicious transactions by providing illustrations of anomalous economic and financial conduct. F. E. Communication of 13th of October 2017 → promotion of the active collaboration in relation to the risks related to the inflows of "returnees")



"INSTRUMENTAL" AND HORIZONTAL COOPERATION AT NATIONAL LEVEL:

SECTORAL SUPERVISORY AUTHORITIES (BANK OF ITALY, CONSOB, IVASS):

- ADOPT REGULATIONS REGARDING AUDITING, REGISTRATION, ORGANIZATION, PROCEDURES AND INTERNAL CONTROLS AML / CFT;
- DEFINE PROCEDURES AND METHODOLOGIES FOR AML/CFT RISK ASSESSMENT;
- HAVE THE POWERS OF ASSESSMENT ON THE ADEQUACY OF THE ORGANIZATION OF ENTITIES SUPERVISED;
- HAVE POWER OF SUPERVISION AND ENFORCEMENT;
- SIGNAL TO UIF AND DNA (ANTIMAFIA BUREAU) SITUATIONS AML / CFT;
- GIVE INFORMATION TO EUROPEAN FINANCIAL SUPERVISORY AUTHORITIES.



"INSTRUMENTAL" AND HORIZONTAL COOPERATION AT NATIONAL LEVEL:

- **Article 49 Dir. 2015/849/UE:** Member States shall ensure that policy makers, the FIUs, supervisors and other competent authorities involved in AML/CFT have effective mechanisms to enable them to cooperate and coordinate domestically concerning the development and implementation of policies and activities to combat money laundering and terrorism financing;
- Italian FIU and sectoral supervisory authorities collaborate to facilitate the identification of every circumstance in which facts and situations which can be used to prevent the use of the financial and economic system for money laundering or terrorism financing (Article 12, paragraph 1 Legislative Decree No. 231/2007);
- The FIU relies on cooperation and information exchange at national and international level to perform its duties effectively and more generally to ensure the efficiency and efficacy of the AML/CFT system as a whole.
- Cooperation may take different forms: supervisory authorities may waive the rule of professional secrecy when working together and with the FIU, in order to facilitate the task of all concerned; supervisory authorities may be required to provide information to the FIU; and the FIU and the investigative and judicial authorities may collaborate in numerous areas to identify and examine anomalous financial flows and transactions.



"INSTRUMENTAL" AND HORIZONTAL COOPERATION AT NATIONAL LEVEL:

SOME WAYS OF COLLABORATION

- **PROTOCOL. UIF / BDI 2009; PROT. UIF/CONSOB 2012; PROT. UIF ISVAP-IVASS 2011**
 - **Information from sectoral authorities to FIU in case of anomalies detected in the exercise of supervision;**
 - **inspection activity coordination;**
 - **access of UIF to sectoral authorities databases;**
 - **coordination in reporting to judicial authorities;**
 - **exchanges resulting studies and joint analysis;**
 - **collaboration of sectoral authorities to UIF to update identification of suspicious transactions by providing illustrations of anomalous economic and financial conduct in the sector supervised by authorities;**
 - **periodic common training sessions;**

- **Collaboration in defining inspection criteria (risk-based approach).**



"INSTRUMENTAL" AND HORIZONTAL COOPERATION AT NATIONAL LEVEL:

SAME EXAMPLES OF COLLABORATION

- AML/CFT PROFILES ABOUT FOREIGN COMPANIES, OPERATING IN ITALY, WERE REQUESTED TO IVASS BY THE HOME STATE AUTHORITY (DIR. 2007/44/EC AND GUIDELINES CEIPOS / CESR / CEBS 11TH OF JULY 2008 → SHAREHOLDER REPUTATION EVALUATION → **TRANSVERSE COLLABORATION** : IVASS REQUESTED INFORMATION TO ITALIAN UIF AND ITALIAN UIF COMUNCATED THEM TO FOREIGN UIF WITH PRIOR TO COMMUNICATE THEM TO HOME STATE AUTHORITY.



CAN AML/CFT INFORMATION BE COMMUNICATED AND USED FOR PRUDENTIAL PURPOSES?

- ART. 12 D. 231/2007 IMPOSE THE REQUESTS FOR INFORMATION TO UIF MUST ONLY BE REASONED WITH REFERENCE TO THE OBJECTIVES;
- IN ANOTHER CASE, THE RULE OF PROFESSIONAL SECRECY IS EFFECTIVE;
- THE CONFIDENTIALITY OF WHO MAKES REPORT OF SUSPICIOUS TRANSACTIONS IS STRONGER (Article 38 D. LGS No. 231/2007)



"INSTRUMENTAL" AND HORIZONTAL COOPERATION AT NATIONAL LEVEL:

DIR. 2018/843/UE 30° OF MAY 2018 (PUBLISHED 19th JUNE 2018, TO BE IMPLEMENTED WITHIN 18 MONTHS)

- “THE RULE OF PROFESSIONAL SECRECY DOES NOT PREVENT THE EXCHANGE OF INFORMATION BETWEEN COMPETENT AUTHORITIES SUPERVISING CREDIT AND FINANCIAL INSTITUTIONS WITHIN A MEMBER STATE IN ACCORDANCE WITH THIS DIRECTIVE OR OTHER LEGISLATIVE ACTS RELATING TO THE SUPERVISION OF CREDIT AND FINANCIAL INSTITUTIONS”;
- “COMPETENT AUTHORITIES SUPERVISING CREDIT AND FINANCIAL INSTITUTIONS RECEIVING CONFIDENTIAL INFORMATION SHALL ONLY USE THIS INFORMATION IN THE DISCHARGE OF THEIR DUTIES UNDER THIS DIRECTIVE OR UNDER OTHER LEGISLATIVE ACTS IN THE FIELD OF AML/CFT, OF PRUDENTIAL REGULATION AND OF SUPERVISING CREDIT AND FINANCIAL INSTITUTIONS, INCLUDING SANCTIONING”;
- “MEMBER STATES SHALL ENSURE THAT COMPETENT AUTHORITIES SUPERVISING CREDIT AND FINANCIAL INSTITUTIONS COOPERATETO THE GREATEST EXTENT POSSIBLE, REGARDLESS OF THEIR RESPECTIVE NATURE OR STATUS. SUCH COOPERATION ALSO INCLUDES THE ABILITY TO CONDUCT, WITHIN THE POWERS OF THE REQUESTED COMPETENT AUTHORITY, INQUIRIES ON BEHALF OF A REQUESTING COMPETENT AUTHORITY, ...”;
- “MEMBER STATES MAY AUTHORIZE THEIR NATIONAL COMPETENT AUTHORITIES WHICH SUPERVISE CREDIT AND FINANCIAL INSTITUTIONS TO CONCLUDE COOPERATION AGREEMENTS PROVIDING FOR COLLABORATION AND EXCHANGES OF CONFIDENTIAL INFORMATION WITH THE COMPETENT AUTHORITIES OF THIRD COUNTRIES THAT CONSTITUTE COUNTERPARTS OF THOSE NATIONAL COMPETENT AUTHORITIES. SUCH COOPERATION AGREEMENTS SHALL BE CONCLUDED ON THE BASIS OF RECIPROCITY AND ONLY IF THE INFORMATION DISCLOSED IS SUBJECT TO A GUARANTEE OF PROFESSIONAL SECRECY..”



DIRECT COOPERATION AT EU LEVEL:

(lett. G) rec. 40 GAFI; dec. 2000/642/GAI; Sottos. III (artt. da 51 a 57) dir. 2015/849/UE; Sottos. II-bis dir. 2018/843/UE; decree n. 231/2007)

- COUNTRIES SHOULD ENSURE THAT THEIR COMPETENT AUTHORITIES CAN RAPIDLY, CONSTRUCTIVELY AND EFFECTIVELY PROVIDE THE WIDEST RANGE OF INTERNATIONAL COOPERATION IN RELATION TO AML/CFT. COUNTRIES SHOULD DO SO BOTH SPONTANEOUSLY AND UPON REQUEST, AND THERE SHOULD BE A LAWFUL BASIS FOR PROVIDING;
- COUNTRIES SHOULD AUTHORIZE THEIR COMPETENT AUTHORITIES TO USE THE MOST EFFICIENT MEANS TO COOPERATE. SHOULD A COMPETENT AUTHORITY NEED BILATERAL OR MULTILATERAL AGREEMENTS OR ARRANGEMENTS, SUCH AS A MEMORANDUM OF UNDERSTANDING (MOU), THESE SHOULD BE NEGOTIATED AND SIGNED IN A TIMELY WAY WITH THE WIDEST RANGE OF FOREIGN COUNTERPARTS.
- COMPETENT AUTHORITIES SHOULD USE CLEAR CHANNELS OR MECHANISMS FOR THE EFFECTIVE TRANSMISSION AND EXECUTION OF REQUESTS FOR INFORMATION OR OTHER TYPES OF ASSISTANCE. COMPETENT AUTHORITIES SHOULD HAVE CLEAR AND EFFICIENT PROCESSES FOR THE PRIORITIZATION AND TIMELY EXECUTION OF REQUESTS, AND FOR SAFEGUARDING THE INFORMATION RECEIVED;
- THE REFUSAL TO COOPERATE MUST BE ADEQUATELY MOTIVATED;
- INFORMATION EXCHANGED ARE FINANCIAL, ADMINISTRATIVE, INVESTIGATIVE;



DIRECT COOPERATION AT EU LEVEL:

(lett. G) rec. 40 GAFI; dec. 2000/642/GAI; Sottos. III (artt. da 51 a 57) dir. 2015/849/UE; Sottos. II-bis dir. 2018/843/UE; decree n. 231/2007)

- THE TRANSMITTING FIU MAY IMPOSE RESTRICTIONS AND CONDITIONS FOR THE USE OF THAT INFORMATION. THE RECEIVING FIU SHALL COMPLY WITH THOSE RESTRICTIONS AND CONDITIONS;
- FOR COMMUNICATIONS, FIUS USE ADEQUATE AND PROTECTED NETWORKS AND GUARANTEE CONFIDENTIALITY; MEMBER STATES SHALL ENCOURAGE THE USE OF THE FIU.NET OR ITS SUCCESSOR.
- THE FIU TO WHOM THE REQUEST IS MADE IS REQUIRED TO USE THE WHOLE RANGE OF ITS AVAILABLE POWERS WHICH IT WOULD NORMALLY USE DOMESTICALLY FOR RECEIVING AND ANALYSING INFORMATION;
- A FIU MAY REFUSE TO EXCHANGE INFORMATION ONLY IN EXCEPTIONAL CIRCUMSTANCES WHERE THE EXCHANGE COULD BE CONTRARY TO FUNDAMENTAL PRINCIPLES OF ITS NATIONAL LAW. THOSE EXCEPTIONS SHALL BE SPECIFIED IN A WAY WHICH PREVENTS MISUSE OF, AND UNDUE LIMITATIONS ON, THE FREE EXCHANGE OF INFORMATION FOR ANALYTICAL PURPOSES.



DIRECT COOPERATION AT EU LEVEL:

(lett. G) rec. 40 GAFI; dec. 2000/642/GAI; Sottos. III (artt. da 51 a 57) dir. 2015/849/UE; Sottos. II-bis dir. 2018/843/UE; decree n. 231/2007)

- DIFFERENCES BETWEEN NATIONAL LAW DEFINITIONS OF TAX CRIMES SHALL NOT IMPEDE THE ABILITY OF FIUS TO EXCHANGE INFORMATION OR PROVIDE ASSISTANCE TO ANOTHER FIU;
- MEMBER STATES SHALL NOT PROHIBIT OR PLACE UNREASONABLE OR UNDULY RESTRICTIVE CONDITIONS ON THE EXCHANGE OF INFORMATION OR ASSISTANCE.
- A REQUEST FOR ASSISTANCE CAN NOT BE REFUSED ON THE GROUNDS THAT: **1)** THE REQUEST IS ALSO CONSIDERED TO INVOLVE TAX MATTERS; **2)** NATIONAL LAW REQUIRES OBLIGED ENTITIES TO MAINTAIN SECRECY OR CONFIDENTIALITY, EXCEPT IN THOSE CASES WHERE THE RELEVANT INFORMATION THAT IS SOUGHT IS PROTECTED BY LEGAL PRIVILEGE OR WHERE LEGAL PROFESSIONAL SECRECY APPLIES; **3)** THERE IS AN INQUIRY, INVESTIGATION OR PROCEEDING UNDERWAY IN THE REQUESTED MEMBER STATE, UNLESS THE ASSISTANCE WOULD IMPEDE THAT INQUIRY, INVESTIGATION OR PROCEEDING; **4)** THE NATURE OR STATUS OF THE REQUESTING COUNTERPART COMPETENT AUTHORITY IS DIFFERENT FROM THAT OF REQUESTED COMPETENT AUTHORITY;



DIRECT COOPERATION AT EU LEVEL:

(lett. G) rec. 40 GAFI; dec. 2000/642/GAI; Sottos. III (artt. da 51 a 57) dir. 2015/849/UE; Sottos. II-bis dir. 2018/843/UE; decree n. 231/2007)

- **Art. 13 Decree n. 231/2007 – international cooperation :**
 - International cooperation is governed by specific provisions concerning relations between the FIU for Italy and the FIUs of other countries;
 - Information on suspicious transactions may be exchanged by way of derogation from the rule on professional secrecy and under memorandums of understanding, obtaining the necessary investigative information from the Finance Police and the Antimafia Bureau;
 - International exchanges of information take place via secure and protected channels of communication, the Egmont Secure Web, a global system run by the Egmont Group, and FIU.NET, a network shared by all the EU FIUs.
 - Procedures for information exchanges with foreign investigative authorities are regulated by a memorandum of understanding with the FIU



DIRECT COOPERATION AT EU LEVEL :

(lett. G) rec. 40 GAFI; dec. 2000/642/GAI; Sottos. III (artt. da 51 a 57) dir. 2015/849/UE; Sottos. II-bis dir. 2018/843/UE; decree n. 231/2007)

SAME WAYS OF COLLABORATION:

- FIU.net, since 2016 hosted at Europol;
 - report of suspicious *cross border* transactions;
 - automatic exchange of report of suspicious *cross border* transactions;
 - transverse collaboration;
 - network ma3tch → anonymous matching of data bases leading to identification nominative recurrences and links with other countries instead of the system of known / unknown search.



**DIRECT COOPERATION AT SUPRANATIONAL LEVEL:
(lett. G) rec. 40 GAFI; standards Egmont; art. 12 decree n. 231/2007)**

- **LETT. G) RACC. 40 GAFI → COOPERATION:**
 - ***FULL, RAPID, CONSTRUCTIVE AND EFFECTIVE;***
 - ***SPONTANEOUS OR ON REQUEST;***
 - ***WITH USE OF EFFECTIVE MEANS;***
 - ***AGREEMENTS OR MEMORANDUM OF UNDERSTANDING BETWEEN MOST HOMOLOGUS SUBJECTS;***
 - ***TRANSPARENT CHANNELS FOR TRANSMISSION OF INFORMATION ;***
- **EXCHANGE MULTIDISCIPLINARITY ;**

- **Art. 13 Decree n. 231/2007 – international cooperation :**



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COOPERATION AT SUPRANATIONAL LEVEL
(lett. G) rec. 40 GAFI; standards Egmont; art. 12 decree n. 231/2007)

SAME WAYS OF COLLABORATION:

- DEVELOPMENT ESW 8EGMONT SECURE WEB;
- ISIL PROJECT (2015-2016 SPECIFIC CLUSTERS, PREVENTIVE INTELLIGENCE THROUGH ESW).