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REPUBLIKA E SHQIPËRISË

**Inter-Institutional Technical Working Group**

**"Strategy for Public Education on the Risks that  
Money Laundering and Terrorism Financing  
Pose in Our Society"**

**2025 - 2027**

**Approved by Inter-Institutional Technical Working Group**

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# Content

<b>Introduction.....</b>	<b>3</b>
<b>Education on the Risks of Money Laundering and Terrorism Financing.....</b>	<b>5</b>
<b>Objective and Goals of the Strategy.....</b>	<b>9</b>
<b>Role of the Inter-institutional Technical Working Group.....</b>	<b>10</b>
<b>Role of the Financial Intelligence Agency (AIF) in this Process.....</b>	<b>11</b>
<b>Effects of Misinformation.....</b>	<b>12</b>
<b>Use of New Technologies (Fintech).....</b>	<b>13</b>
<b>Communication Channels and Activities.....</b>	<b>16</b>
<b>Examples of Communication with Specific Groups.....</b>	<b>17</b>
<b>Annex I: Action Plan.....</b>	<b>19</b>
<b>Annex II: Questionnaire.....</b>	<b>21</b>

## Introduction

The prevention of money laundering and terrorist financing are issues that deserve special attention!

*What is Money Laundering?* Money laundering is the process of converting or transferring assets, concealing or disguising the nature of income, acquiring, possessing, or using assets while knowing that they originate from a criminal offense or illegal activity. It also includes participating in or assisting in the movement of funds to make illegal proceeds appear legitimate. Through this process, individuals involved in criminal activities hide the illicit origin of their funds and assets to avoid suspicion from law enforcement agencies and prevent measures taken by competent authorities to investigate them.

*What is Terrorist Financing?* Terrorist financing involves all actions intended to fund terrorist activities. If the source of terrorist financing comes from legal income, the individuals may aim to conceal the origin of the funds but take steps to hide their destination and purpose. On the other hand, when terrorists and terrorist groups are financed through illegal activities, they take measures to hide both the origin and the destination of the funds.

The prevention and detection of money laundering can effectively help identify criminals and terrorists and how they have secured their funds. The application of financial intelligence and investigative techniques can assist in detecting and disrupting terrorist activities.

The phenomena of money laundering and terrorist financing have also been addressed by numerous international organizations, which have implemented various preventive instruments and mechanisms. The illicit proceeds subjected to the laundering process can originate from individual or organized criminal activities, illegal operations, bribes received by corrupt public officials, and a wide range of other unlawful activities conducted by both public and private business entities.

Money laundering and terrorist financing have negative consequences for the economic and financial stability of a country. In this context, preventive measures play a crucial role in stopping the spread of the negative impacts of these criminal offenses. Money laundering crimes can be committed by any individual, including the one who committed the original offense, a form known as self-laundering. Often, these crimes are carried out by more than one person.

Money Laundering of “Proceeds of Crime” is Carried Out Through:

- a) The exchange or transfer of assets to conceal or disguise their illegal origin while knowing that these assets are the proceeds of a criminal offense or criminal activity.
- b) The concealment or disguise of the true nature, source, location, disposition, movement, ownership, or rights related to assets, while knowing that these assets are the proceeds of a criminal offense or criminal activity.

c) The acquisition, possession, or use of assets while knowing at the time of receipt that they are the proceeds of crime.

c) carrying out financial transactions or fragmented transactions to avoid reporting, in accordance with legislation for the prevention of money laundering;

d) investing in economic or financial activities using money or assets, knowing that they are the proceeds of a criminal offense or criminal activity;

dh) advising, assisting, encouraging, or publicly calling for the commission of any of the offenses specified above;

Terrorist financing is the provision or collection of funds, by any means, directly or indirectly, with the intent that they be used, or knowing that they will be used, in whole or in part:

a) To commit acts with terrorist purposes;

b) By a terrorist organization;

c) By an individual terrorist.

Key indicators of money laundering cases and potentially terrorist financing include:

- Bank transfers involving companies registered in countries considered as "Tax Havens";
- Investments in real estate by individuals involved in criminal activities;
- Transactions that do not match the business profile of commercial companies;
- Establishment and acquisition of companies to engage in lending activities;
- Large international transfers of funds;
- Circulation of large amounts in the banking system without reliable supporting data explaining the reason for the transactions;
- Transfers made with countries where there are no apparent reasons for conducting business (such as trade, remittances, etc.);
- Money laundering or terrorist financing through trade;
- Funds derived from charitable activities being used to finance terrorism;
- Terrorist financing through funds of legal origin;
- The use of illicit funds by terrorist organizations.

Like any other country, Albania cannot be immune to crime and the money laundering activities associated with criminal operations. Cases of money laundering practices uncovered by law enforcement authorities, media, etc., have compelled state authorities to review, from time to time, the legal and regulatory framework, including necessary preventive measures.

In addition to drafting an updated legal framework that corresponds to the level and extent of money laundering and terrorist financing phenomena, responsible institutions have been established and are operational. A permanent institutionalized process has been put in place to

ensure timely adaptation to all international regulatory changes, such as the FATF standards and methodology, as well as EU directives, among others.

The fight against Money Laundering (ML) and Terrorist Financing (TF) continues to be of special importance for our country, and Albania remains committed to preventing, detecting, and prosecuting money laundering and terrorist financing (ML/TF) by establishing an appropriate legal and institutional framework. The fight against ML/TF aims to protect the financial system, eliminate resources available to terrorists, and minimize the benefits that individuals involved in crimes gain from their criminal activities.

However, as in any other field, the prevention of money laundering and terrorist financing is not solely dependent on the quality of the legal framework but rather on the effectiveness of the implementation of legal and regulatory requirements. Among the additional measures that need to be taken is increasing public awareness of these phenomena and their negative consequences, which are increasingly becoming global concerns.

Taking into consideration the main objective of the **National Strategy for the Prevention of Money Laundering and Terrorist Financing 2024 - 2030** and its four key priorities, we believe that in fulfilling the first priority, which relates to improving policymaking and coordination, it is essential to focus on developing a strategy aimed at educating the public about the risks posed by money laundering and terrorist financing in our society.

The priorities of the strategy are grouped into six objectives:

1. Improving the regulatory framework and strengthening inter-institutional coordination;
2. Further enhancing the effectiveness of the preventive system;
3. Improving the operational efficiency of law enforcement agencies and other entities in the fight against ML/TF;
4. Utilizing and leveraging technological innovations while reducing risks;
5. Increasing the effectiveness of the supervisory system;
6. Strengthening international cooperation.

The implementation of this strategy aims to further consolidate Albania's ML/TF regime in alignment with national and international developments and relevant ML/TF threats.

Consequently, we will focus on the target groups, the objectives to be achieved, the communication channels, and the entities involved, among others.

## **Education on the Risks of Money Laundering and Terrorism Financing**

The vision of the **National Strategy for the Prevention of Money Laundering and Terrorism Financing 2024 - 2030** is the development of a **sustainable system in Albania** to combat the **informal economy, terrorism financing, and other financial crimes**, integrating into regional

and international efforts to ensure **social peace, well-being, dignity, equality, and sustainable economic development** in line with the policies of the **Government of the Republic of Albania**.

**Money laundering** harms the country's economy in the long term and **undermines the integrity of the financial system** and the rule of law.

### **Key Consequences of Money Laundering**

**Economic Impact:** Money laundering affects both major financial markets and developing economies, as it damages financial institutions critical for economic growth. As developing markets like Albania grow their economies and financial sectors, they also become increasingly targeted for money laundering activities. Money laundering fuels crime and corruption, slowing economic growth and reducing the productivity of the real economy. The negative effects of money laundering on the economy may manifest in cash demand, growth rates, income distribution, exchange rates, and tax revenues.

**Governance Impact:** Money launderers threaten the quality of governance by manipulating privatization processes and public procurement procedures. Criminal organizations can outcompete legitimate businesses in securing public contracts or acquiring state-owned enterprises. When illicit funds are invested in this manner, criminals expand their illegal activities and corruption, depriving the country of a legitimate, tax-paying, and market-based economy that serves the public interest.

**Social Impact:** Money laundering enables criminals to expand their operations, increasing law enforcement costs. It shifts economic and political power from the government, citizens, and the market to criminals, potentially leading to state capture. High levels of money laundering often result in reduced public spending and lower investments in healthcare, education, social services, and infrastructure, ultimately worsening the well-being of citizens.

**Development Impact:** Countries with weak anti-money laundering (AML) regimes face negative developmental consequences. Foreign financial institutions may limit transactions with local institutions, halt investments, increase transaction costs, or impose additional controls. Legitimate businesses may suffer restricted access to financial markets or higher operational costs due to increased scrutiny of ownership structures and compliance systems. As a result, weak AML regimes attract fewer foreign investments, while foreign aid may also be significantly reduced.

**Security Impact:** A country perceived as a money laundering haven is likely to attract more criminals. Factors contributing to increased crime and corruption include weak or selective enforcement of AML regulations and ineffective penalties, such as insufficient asset confiscation and seizure measures. To facilitate money laundering, criminals often increase bribery directed at public officials, financial institution employees, notaries, accountants, lawmakers, supervisory authorities, police officers, prosecutors, and judges.

**Private Sector Impact:** Money launderers use shell companies, which appear legitimate but are actually controlled by criminals. These entities mix illicit funds with legal funds to disguise the true source of revenue. By utilizing shell companies and investments in legitimate businesses,

money laundering profits can be used to control entire industries or critical economic sectors, leading to market distortions and price instability. Moreover, money laundering facilitates tax evasion, depriving the country of essential tax revenues.

### **Key Communication Channels of the Financial Intelligence Agency**

The Financial Intelligence Agency will communicate through:

- The official website;
- Participation in national seminars and conferences with AML-regulated entities;
- Training sessions to raise awareness of the risks posed by money laundering and terrorism financing to Albania's financial system;
- Publishing guidelines, typologies, and indicators related to AML/TF risks;
- Informing the public about institutional efforts in combating financial crime;
- Annual reports and parliamentary committee reports on security issues;
- Frequently asked questions (FAQ) publications for regulated entities.

### **High-Risk Categories for Money Laundering Involvement**

#### **1. High-Risk Individuals (Residents)**

Scenarios with the highest risk related to individuals include

- Purchasing assets with unknown or unjustified sources of funds;
- Receiving frequent, small-value transfers from unrelated individuals;
- Depositing large amounts of cash into bank accounts with unknown sources of funds;
- Purchasing real estate below market value and revaluing it within a short period;
- Financial transactions (deposits, transfers, real estate or asset investments) involving individuals suspected of criminal activities;
- High-value investments in real estate using third-party intermediaries.

#### **2. Resident Legal Entities**

Resident legal entities represent the second-largest category of subjects potentially involved in money laundering, primarily deriving income from crimes related to tax evasion, fraud, organized crime, and corruption. The main risk scenarios include:

- Injecting funds of unknown origin into the real commercial circulation.
- Investing in real estate under the name of an existing company owned by individuals suspected of engaging in criminal activities, with values unjustified by legal sources.
- Receiving large transfers into the business account of a suspected criminal entity from companies with no clear connection between the service/product provided and the payment.
- A single individual being involved in multiple entities with the same business activity or address, conducting transactions without a clear connection between the transaction parties.

- Suspicious transfers received into a company's account that lacks a legitimate economic activity.
- Using legal entities to receive international transfers through fraud, where the majority of funds are channeled abroad, and a portion is withdrawn in cash.

### 3. Non-Resident Individuals

The main risk scenarios related to this category include:

- Creating and registering resident legal entities and using their bank accounts to receive or send transfers to/from various jurisdictions without a clear link to the company's business activity, primarily raising concerns of tax evasion.
- Making real estate investments, primarily residential, without a clear source of income.

### 4. Resident Politically Exposed Persons (PEPs)

Due to their function, suspicious cases related to PEPs often involve the predicate offense of "Abuse of Office/Corruption." The main risk scenarios include:

- High-value investments in a business after leaving office (former PEP) without a clear source of income or declaring immediate high profits from a business owned by a former PEP.
- High fund turnover in individual accounts declared by PEP, but unjustified by the business's income;
- Investments in real estate after the end of the mandate without a clear source of income;
- Investments in assets by PEP with declared value below the market price;
- Initial appointment of administrators/legal representatives as well as shareholders of legal entities without data on criminal activity, but clearly without the proper preparation in economic or educational culture to own or develop such business activities, which are de facto controlled by PEP and later transferred to their names. Some of these companies, in sporadic cases, are involved in public procurement.

The implementation of the strategy aims to:

- Continuous and sustained communication and collaboration with public and private institutions, members of the Inter-Institutional Technical Working Group;
- Close cooperation with law enforcement entities for the prevention of money laundering and terrorist financing, their associations, and supervisory authorities in the function of raising awareness and enhancing preventive capacities;
- Informing the general public about the work of the institutions involved in preventing money laundering, terrorist financing, and combating criminal activity;
- Improving the reputation of authorities by being accountable for efforts made in the fight against corruption and money laundering.



## Objective and Goals of the Strategy

The objectives of the Strategy on public education regarding the risks of money laundering and terrorist financing in our society focus on several directions:

**First**, raising awareness among the general public about the risks associated with money laundering and terrorist financing in our society. This can be achieved through:

- Publishing data (and encouraging the publication of data by any individual, public or private institution) related to issues that various sectors of the economy and society face regarding money laundering or terrorist financing;
- Encouraging writings and publications, analytical or problematic, from researchers in this field;
- Publishing cases and various typologies related to money laundering or terrorist financing obtained from criminal investigations or asset investigations;
- Cooperation with various media for the programming and development of television programs on the issues posed by money laundering and terrorist financing;

**Second**, on educating students during their academic formation, which can be achieved (in collaboration with the Ministry of Education or different faculties) through:

- Assessing the opportunities for high school or college curricula in our country to include one or more topics on the risks posed by the integration of money obtained from criminal activity into the economy and the state's development;
- Assessing the possibility for curricula in faculties related to economics, law, administration, social policy, etc., to include subjects or focused lectures on money laundering and terrorist financing (covering topics such as the definition of money laundering and terrorist financing, their forms, the risks they pose to the economy and society, the current legislation, international experience, responsible operators and agencies, etc.);
- Assessing the possibility for master's programs in faculties with criminal law and organized crime profiles to focus on courses or lectures specifically related to money laundering and terrorist financing, with expanded discussions;
- Encouraging the treatment of topics related to money laundering and terrorist financing in the courses or dissertations of faculties, master's programs, or even doctoral theses, to ensure that this field receives significant academic attention;

**Third**, on the continuous training of investigators, prosecutors, judges, and any other entities focusing on identifying and pursuing cases related to money laundering and terrorist financing (in collaboration with the School of Magistrates, KLGJ, KLP, the Prosecutor's Office, General Police Directorate, Tax Authorities, Customs, etc.).

**Fourth**, training the business community (in collaboration with the National Chamber of Commerce, etc.) and public administration (in collaboration with the Albanian School of Public

Administration) to identify suspicious financial activities and use educational materials on the prevention of money laundering and terrorist financing, using brochures, guides, etc.

This document serves as a guide for informing all categories of legal subjects, interest groups, and the general public on issues related to legal initiatives in the field of AML/FT, regulatory requirements, strategic documents in the field of AML/FT, and the progress of their implementation, the national risk assessment of AML/FT, and sectoral assessments, best practices and international recommendations, legal obligations for reporting to responsible authorities, risk-based supervision of AML/FT, and relevant findings.

## **Role of the Inter-Institutional Technical Work Group**

By decision no. 2, dated December 26, 2023, of the Committee for Coordinating the Fight Against Money Laundering (CCFL), the creation of the Inter-Institutional Technical Work Group (IITWG) has been established. The IITWG is composed of high or mid-level representatives from each institution that is a member of the CCFL.

The IITWG is a special structure aimed at enhancing communication between responsible institutions and the private sector to make progress in the anti-money laundering (AML) and counter-financing of terrorism (CFT) system more effective, measurable, and sustainable.

The IITWG will take a leading role in coordinating institutional efforts for the implementation of the recommendations from Moneyval and alignment with EU legislation on the prevention and combating of money laundering and terrorist financing, including commitments to fulfill the recommendations of the FATF. These objectives require serious and sustained engagement from a number of institutions in the country through:

- More efficient coordination with Supervisory Authorities and the private sector to ensure reporting entities comply with all preventive measures;
- Coordination with law enforcement institutions to identify major risks related to AML/CFT;
- Inter-institutional coordination for efficient implementation of international regulatory standards and their changes;
- Coordination with national institutions for training to strengthen capacity in preventing and fighting AML/CFT.

The Inter-Institutional Technical Work Group, with full support from the institutions it represents, is tasked with:

- Drafting the National Strategy "For the Prevention of Money Laundering and Terrorist Financing 2024-2030" and its action plan;
- Monitoring the implementation of the action plan for 2024;
- Preparing for the 6th round of evaluation by the Moneyval Committee through:

- Conducting simulated exercises for evaluating effectiveness according to the relevant procedures;
- Collecting data, providing information, contributing, and representing in the Moneyval evaluation process.

## **Role of the FIU in this process**

The Financial Intelligence Unit (FIU) operates as a General Directorate under the Minister responsible for Finance and exercises its functions in accordance with Law No. 9917/2008 "On the Prevention of Money Laundering and Financing of Terrorism," as amended. The FIU is headed by a General Director, who has the following duties and responsibilities:

- a) Leads the FIU and represents it in relations with third parties, both domestically and internationally;
- b) Signs cooperation agreements with domestic institutions and foreign counterparts or other international organizations that are subject to similar confidentiality obligations, in accordance with its functions;
- c) Provides periodic written reports to the Committee for Coordinating the Fight Against Money Laundering regarding the activities of the FIU;
- d) Leads and directs the work of the inter-institutional technical group for the prevention of money laundering within the framework of the Committee for Coordinating the Fight Against Money Laundering;
- e) Coordinates efforts for monitoring compliance by reporting entities with the applicable legal obligations.

The mission of the FIU is to protect the country from financial crime and terrorist financing and to contribute to the stability, integrity, growth, and sustainability of the financial system in Albania and the economy as a whole, through the detection and combating of criminal activities via our regulatory programs and financial intelligence.

In accordance with the aforementioned law, the FIU exercises several functions and duties, including:

- Collecting, administering, processing, analyzing, and distributing data, reports, and information to competent authorities regarding money laundering and terrorist financing;
- Organizing and participating, alongside public and private institutions, in training activities aimed at preventing money laundering and terrorist financing and organizing or participating in programs to raise public awareness;

- Publishing an annual public report within the first quarter of each year, covering the previous year's activities, including detailed statistics on the origin of reports received and the outcomes of cases referred to the prosecutor's office.

Training of reporting entities on AML/CFT matters, publishing the Annual Report, which includes important statistical and qualitative data, as well as other documents published on the FIU's official website (e.g., risk assessment), plays a significant role in informing and raising public awareness about the risks of money laundering and terrorist financing.

FIU communication activities will be divided into modules, with each focusing on specific groups of reporting entities, business groups, or the wider public. Communication can be direct (e.g., meetings with universities) or online (media).

The following are summarized communication formats:

- Publications on legal changes and obligations to be followed by reporting entities;
- Updates to frequently asked questions by reporting entities;
- Publishing information on institutional activities and its role in preventing money laundering;
- Informing the public about international activities and their impact on the country's economic life (e.g., evaluations by the Moneyval Committee of the Council of Europe, Financial Action Task Force - FATF);
- Publications on institutional participation in international projects offering assistance to Albania;
- Updated information on the implementation of international sanctions and communication with reporting entities and the public;
- Publication of strategic documents, action plans, and their implementation progress;
- Informing the public about inter-institutional cooperation activities, working groups, joint inspections, etc.;
- Preparing presentations and accompanying materials for training provided to reporting entities on specific issues (e.g., the preventive system, regulations, internal procedures, responsible personnel, AML/CFT risk assessment, implementation of international sanctions);
- Informational activities with business groups and associations of reporting entities.

## **Effects of Misinformation**

The rapid spread of information through digital platforms has revolutionized how we receive and interpret news and information in all aspects of life, particularly in areas related to social issues, political activity, and the economy and finance.

The internet has transformed various aspects of daily life, including how individuals conduct financial transactions and receive services from state institutions. Access to banking, investment,

and commercial platforms has made it easier for individuals to understand and consult financial information.

However, this increased information flow has also been accompanied by a concerning spread of misinformation, which can have detrimental effects on individuals, markets, and the overall economy of a country.

Misinformation refers to the spread of false or inaccurate information, often unintentionally, leading to misinterpretation of facts or events. It can originate from various sources, such as human error or incomplete data, often based on false claims and misleading content.

Misinformation in the financial-economic field specifically involves the spread of false news or deceptive information regarding financial matters, aiming to manipulate markets, investors, or financial systems for personal gain by providing false investment advice, manipulating financial statements, or running fraudulent schemes targeting individuals or institutions.

Education and public awareness of the risks arising from such misinformation aim to identify the types of news and their sources, assess their impact, and reduce harm.

Based on international experience, individuals with higher levels of knowledge (including economic and financial knowledge) have shown a higher level of protection against the impact of financial fake news, highlighting the importance of financial education as an effective strategy to combat this phenomenon.

## **Use of New Technologies (Fintech)**

The rapid development of new financial technologies (Fintech) has brought about changes in how individuals interact with financial services, directly impacting the sophistication of methods used for money laundering and terrorist financing. Fintech products have introduced a range of innovations in the financial sector, including increased efficiency, reduced costs, faster financial transactions, expanded access, greater anonymity, and an expanded range of services. However, for institutions responsible for investigating and preventing money laundering and terrorist financing, it has brought new challenges in detecting and preventing criminal activities.

Given that Albania's use of new financial technologies (Fintech) for conducting financial transactions is in its early stages, it is essential for the public to become familiar with Fintech concepts to avoid falling victim to fraud or misuse by third parties for engaging in illegal or criminal activities.

### **What do we mean by Fintech?**

Financial technology (Fintech) refers to new technologies aimed at improving and automating the use and provision of financial services. Fintech includes all digital platforms that offer:

- Non-face-to-face investment platforms;
- Non-face-to-face money transfer platforms;
- E-money platforms/entities;
- Digital wallet platforms;
- Virtual currencies (cryptocurrency);
- Internet Banking;
- Mobile Banking;
- Crowdfunding platforms.

## Increasing Security in Using Fintech

In this context, the aim is to raise public awareness about protection from fraud and abuse in Money Laundering and Terrorist Financing.

- **Knowing the Platform and Service:** Before using a Fintech platform, ensure it is licensed and has a good reputation. Perform checks on open sources for user reviews and information from regulatory authorities.
- **Regular Monitoring of Financial Accounts:** Regularly monitor account activities to identify suspicious or unauthorized transactions in real-time.
- **Avoiding Suspicious Investment Proposals:** Fintech platforms are often used by individuals involved in illegal or criminal activities. A common fraudulent scheme in recent years has been quick investment opportunities or business creation promises. Ensure more information before making such investments.
- **Using Licensed/Regulated Platforms:** Before using Fintech platforms, make sure they are licensed and regulated in the countries where they operate. If a platform operates in a different country from its licensing jurisdiction, verify that it is the same platform and is being monitored according to money laundering and terrorist financing legislation.
- **Verifying Fundraising Platforms Before Donations:** It is crucial to verify crowdfunding platforms before making donations, as these platforms can sometimes be exploited for illegal activities, including supporting terrorism financing.
- **Using Money Mules Unknowingly:** The increased use of virtual currencies and their possibilities for peer-to-peer transactions, along with the anonymity they offer, can create opportunities for abuse. Often, individuals or entities are unknowingly used as money mules, transferring illegally obtained funds through virtual currencies.

## Target Groups and Priorities

Through public awareness efforts on AML/CFT issues, the aim is to:

- Explain the consequences of criminally sourced money on social, economic, and political life—countering the misconception that "ultimately, money enters Albania and is invested here, so this is how the world has developed."
- Raise public awareness about the risks of engaging in such activities, such as individuals

Since money laundering is also linked to corruption, raising awareness about AML/CFT has an impact on the fight against corruption.

The groups targeted for awareness about the risks of money laundering and the financing of terrorism include citizens in general, but the priorities are:

- **Young people**, starting from high school students and specifically those studying fields such as economics, law, administration, social policy, etc. The goal is to inform them during their formative years about the risks posed to society by the introduction of money generated from criminal activities into the economy. It is hoped that this awareness will help them become better qualified when they enter the public or private sectors, enabling them to identify and prevent such phenomena.
- **Public administration employees** in general, as they form an important group that must be made aware of the risks of money laundering and the financing of terrorism, as well as the necessary measures for their prevention. Special attention should be given to employees of customs, taxation, real estate registration offices, local governments, etc., as they are directly involved in economic and financial activities through which individuals involved in criminal activities pass.
- **Law enforcement personnel** (prosecutors, investigators, judges, etc.), as they play a vital role in detecting, investigating, and prosecuting cases related to money laundering and the financing of terrorism. Continuous training and updating of knowledge about new typologies, guidelines, and international standards will help them in their daily work.
- **Employees of reporting entities** according to the law or designated individuals responsible for preventing money laundering and terrorism financing. These employees, whether in central or local offices, should be well-informed and trained to carry out their duties correctly, regardless of whether they work in public or private sectors. This includes employees in banks, Non-Banking Financial Institutions (NBFIs), savings and loan companies, exchange offices, notaries, lawyers, auditors, real estate agents, etc.
- **Employees in other business sectors**, as business is a crucial pillar for the economy, creating jobs, generating income, and contributing to overall economic growth. Businesses are exposed to AML/CFT risks, so it is important to inform and educate employees working in these businesses, regardless of their specific industry, to enhance efforts and barriers against this criminal phenomenon, which disrupts fair business practices.
- **Any other institution or entity** that is interested in or potentially impacted by these illegal and criminal phenomena will be evaluated for the need for information and awareness.

Raising awareness among these groups through information, public debates, academic education, continuous training, etc., aims to reduce the risks of money laundering and the financing of terrorism in the country.

Within this awareness-raising and educational activity, the following initiatives are considered appropriate and impactful:

- Meetings with business representative organizations and open discussions on issues related to AML/CFT and the steps that need to be taken to identify problems and avoid consequences;
- Meetings with students in classrooms, where in addition to improving their curricula, open lectures on AML/CFT topics should be held;

- Meetings with high school graduates to include civic education in their curriculum, addressing topics about AML/CFT;
- Meetings with employees of central and local administration to raise awareness and engage them in efforts to identify and prevent AML/CFT;
- Initiating debates on TV about AML/CFT to highlight the issues caused in the economy and society, as well as the ways forward for improving the work of law enforcement agencies and various private and public sector operators in the market;
- Publishing problem-oriented writings or editorials in both print and electronic media on AML/CFT;
- Publishing cases and schemes on how AML/CFT is carried out, based on experiences from our country and others;
- Preparing and distributing leaflets or notices on social media about the legal framework in force, individuals' and entities' obligations to detect and report, and the harm caused to society by AML/CFT.

## Communication Channels and Activities

Communication to educate about the risks of money laundering and the financing of terrorism can be done through:

- **Media** (television, radio, podcasts, etc.), communications with journalists' groups having an impact in the economic field;
- **Social media** (Facebook, Twitter, LinkedIn, etc.), distributing educational information on AML/CFT;
- **Creating informational platforms** with articles, videos, and materials on AML/CFT topics;
- **Trainings, workshops, emails;**
- **Partnership with the private sector and NGOs** to organize educational activities on AML/CFT;
- **Periodic publications (newsletters)** containing statistical data, typologies, and indicators, as well as institutional activities at national and international levels;
- **Publishing frequently asked questions (FAQ);**
- **Meetings with GTNP** (National Anti-Money Laundering Task Force) and state institutions and interest groups;
- **Coordination of work for the implementation of strategic documents.**



## **Example Communication with Specific Groups**

### **Example 1**

Information for the general public does not need to be detailed, but it would be sufficient for them to be aware of the legislation, general data on the legal obligations of financial entities and professionals, transactions involving cash, and the obligation to report them.

Public notices could promote legal changes using “positive messages” (e.g., increasing transparency for beneficial owners of legal persons, measures against corruption related to enhanced vigilance towards politically exposed persons, risk-based oversight, and efficient use of human resources in public and private institutions to implement AML/CFT legislation, reducing cash transactions, expanding banking services affecting customer base and reducing transfer costs, transparency in political party financing, and avoiding conflicts of interest, etc.).

### **Example 2**

Target group “compliance experts” from banks and other financial institutions. Information for this group should be more detailed, and institutions could:

- Offer periodic training for compliance officers;
- Continuously inform them about practical issues in implementing AML/CFT legislation;
- Regularly update information on frequently asked questions and other practical issues;
- Provide guidelines for obligated entities to conduct internal training, check the list of persons declared as financiers of terrorism by the UN, the obligation to identify beneficial owners, and implement enhanced vigilance measures.

## **Expected Results**

- Communication activities will mainly focus on financial institutions and categories of professionals based on their exposure to AML/CFT risks.
- The communication process will increase the preventive capacities of entities (e.g., timely responses to information requests, increased quantity and quality of reporting, strengthening cooperation within public-private partnerships);
- An important factor for raising awareness of AML/CFT legislation is ensuring informational materials are available to clients of financial institutions.

## **Further Activities Required by Institutions from AML/CFT Entities**

- Be familiar with legal changes in the AML/CFT field;
- Ensure responsible persons include information about legal changes in employee training sessions;
- Continuously review automated systems, generated signals, and adapt them to identified risk scenarios;
- Review internal regulations and procedures;
- Prepare informational brochures for clients on AML/CFT obligations.

## **Monitoring and Evaluation**

Effective implementation of this strategy relies on a sustainable framework for monitoring and continuously evaluating the related objectives. This framework will allow for tracking progress in real-time, identifying obstacles, and assessing the impact of activities on raising awareness among institutions, obligated entities, and the general public. Monitoring reports will serve as a basis for future planning activities by involved institutions.

To evaluate the implementation of this strategy's objectives, GTNP will develop, maintain, and track the progress of educational projects in the AML/CFT field, along with related programs, and monitor several outcomes to ensure process effectiveness.

This evaluation will be based on the following indicators:

- Number of obligated entities participating in AML/CFT training programs and attendees. Relevant publications on institutions' official websites;
- Number of state institutions participating in AML/CFT informational programs and training sessions and the number of participants. Relevant publications on official websites of institutions;
- Number of interviews or conferences involving institutions and their relevant publications on the institution's official website;
- Organized activities in educational institutions and the number of participants;
- Publishing typologies and AML/CFT indicators on institutions' official websites;
- Publication of annual reports from institutions;
- Press conferences organized regarding published reports at national and international levels;
- Results from surveys or polls related to the effectiveness of the activities in this guideline;
- Surveys conducted with targeted groups for awareness;
- Creation of communication mechanisms to inform the public about priority issues;
- Number of organized meetings with targeted groups, increased participation rates, and presentations made for this purpose.

**Annex I:**  
**ACTION PLAN FOR THE IMPLEMENTATION OF THE COMMUNICATION  
STRATEGY**

Objective 1: Raising public awareness about the risks posed by money laundering and the financing of terrorism in our society, disinformation and foreign interference in the economic and financial system and our society.			
No.	Measures	Responsible institutions	Deadline
1.1	Publication of data (and encouragement of the publication of data by any individual, public or private institution) related to issues faced by various sectors of the economy and society as a whole, due to money laundering or terrorist financing.	Members of the GTNP	April 2025
1.2	Encouraging analytical or issue-based writings and publications by researchers in this field.	Members of the GTNP	June 2025
1.3	Publishing cases and various typologies related to money laundering or the financing of terrorism that have been obtained from criminal investigations or asset investigations.	Members of the GTNP	March 2025
1.4	Collaboration with various media outlets to program and develop television shows on the issues related to money laundering and the financing of terrorism.	Members of the GTNP	June 2025
1.5	Raising awareness of the risks associated with disinformation and foreign interference, within the framework of meetings of the Interinstitutional Technical Working Group.	AIF	2026
1.6	Publications on the official website of the AIF and on social media (LinkedIn, etc.), aimed at raising awareness among the public and state and private institutions about the risks associated with disinformation and foreign interference in the country's economic and financial system.	AIF	2026

Objective 2: The education that students should receive during their academic training.			
No.	Measures	Responsible institutions	Deadline
2.1	Evaluating the possibility for high school or college curricula in our country to include one or more topics on the risks posed to the economy and the development of the rule of law by the introduction of money obtained through criminal activities into the economy.	Members of the GTNP	April 2025
2.2	Evaluating the possibilities for the curricula of faculties related to economics, law, administration, social politics, etc., to include courses or a focused set of lectures or topics, specifically those related to money laundering and the financing of terrorism (where the topics should cover in-depth what money laundering and the financing of terrorism are, their forms of manifestation, potential risks they pose to the economy and society as a whole, the applicable legislation, international experience, responsible operators and agencies, subjects, etc.).	Members of the GTNP	June 2025
2.3	Evaluating the possibilities for master's programs in faculties with criminal law and organized crime profiles to focus on courses or a concentrated set of lectures or topics specifically related to money laundering and the financing of terrorism, with expanded presentations.	Members of the GTNP	April 2025
2.4	Encouraging the inclusion of topics in the courses, master's theses, or even doctoral dissertations that are related to money laundering and the financing of terrorism, with the aim of fostering greater academic attention and treatment of this field.	Members of the GTNP	June 2025
Objective 3: Continuous training for investigators, prosecutors, judges, and any other entity focused on identifying and prosecuting cases related to money laundering and the financing of terrorism.			
No.	Measures	Responsible institutions	Deadline
3	Implementation of the integrated training plan for the year 2025.	Members of the GTNP	During 2025

Objective 4: Training of the business community and public administration to identify suspicious financial activities and the use of educational materials on the prevention of money laundering and the financing of terrorism, using brochures, guides, etc.			
No.	Measures	Responsible institutions	Deadline
4.1	Meeting and training in collaboration with the National Chamber of Commerce.	AIF	April 2025
4.2	Cooperation with the Albanian School of Public Administration to inform civil servants about the prevention of money laundering and the financing of terrorism.	AIF	June 2025

## Annex II: Questionnaire

### Questionnaire on Money Laundering and Terrorism Financing

#### Part I: Personal Information

- a) Age;
- b) Gender;
- c) Education;
- d) Current Occupation;

#### Part II: Knowledge on ML/FT

1. Do you have knowledge about money laundering?

- a) Yes
- b) No

2. Do you know what the purpose of money laundering is and its effects on the country's economic and financial system?

- a) Yes
- b) No

3. What are some of the methods used in the field of money laundering? (check all that apply)

- a) Cash deposits in bank accounts below the reporting threshold;
- b) Use of shell companies and from tax haven countries;
- c) Investments in real estate;
- d) International transfers;

- e) Payments with virtual currencies;
  - f) Others: \_\_\_\_\_
4. Do you know the purpose of terrorism financing and its effects on national and international levels?
- a) Yes
  - b) No
5. What are some common sources of terrorism financing? (check all that apply)
- a) Individual donations;
  - b) Income from illegal activities;
  - c) Legitimate business activities;
  - d) Funds from charitable organizations;
  - e) Others: \_\_\_\_\_
6. How dangerous do you consider these activities to society?
- a) Very dangerous;
  - b) Dangerous;
  - c) Slightly dangerous;
  - d) Not dangerous at all;

### **Part III: Actions and Policies**

7. Do you believe financial institutions are doing enough to prevent money laundering in Albania?
- a) Yes
  - b) No
  - c) I have no information
8. Have you noticed any cases that may be linked to money laundering and organized crime?
- a) Yes
  - b) No
9. How informed are you about the role of the Financial Intelligence Agency and the procedures for reporting suspicious activities?
- a) Very informed;
  - b) Informed;
  - c) Slightly informed;
  - d) Not informed at all;

10. What measures do you think should be taken to combat money laundering and terrorism financing?

- a) Broader education for citizens;
- b) Stricter rules for financial institutions;
- c) Increased international cooperation;
- d) Others: \_\_\_\_\_;

11. Do you think the strategic documents approved in Albania are effective in addressing the risks related to money laundering and terrorism financing in Albania?

- a) Yes
- b) No

#### Part IV: Suggestions and Comments

12. What suggestions do you have to raise awareness on these issues?

13. Do you have any other comments related to this topic?