



REPUBLIC OF ALBANIA

FINANCIAL INTELLIGENCE AGENCY

ANNUAL REPORT 2025



FINANCIAL CRIME
PREVENTION



ADVANCED
ANALYSIS



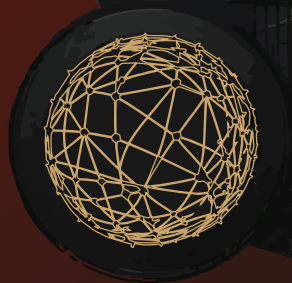
INTERNATIONAL
COOPERATION

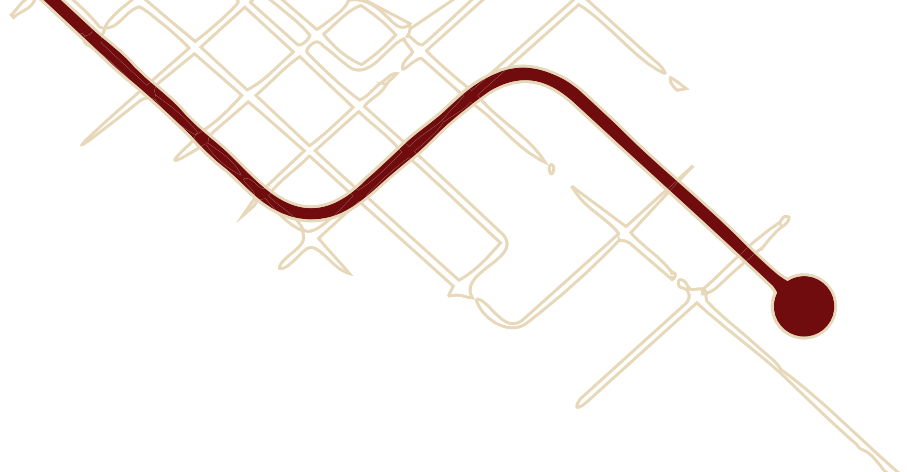


RISK - BASED
APPROACH



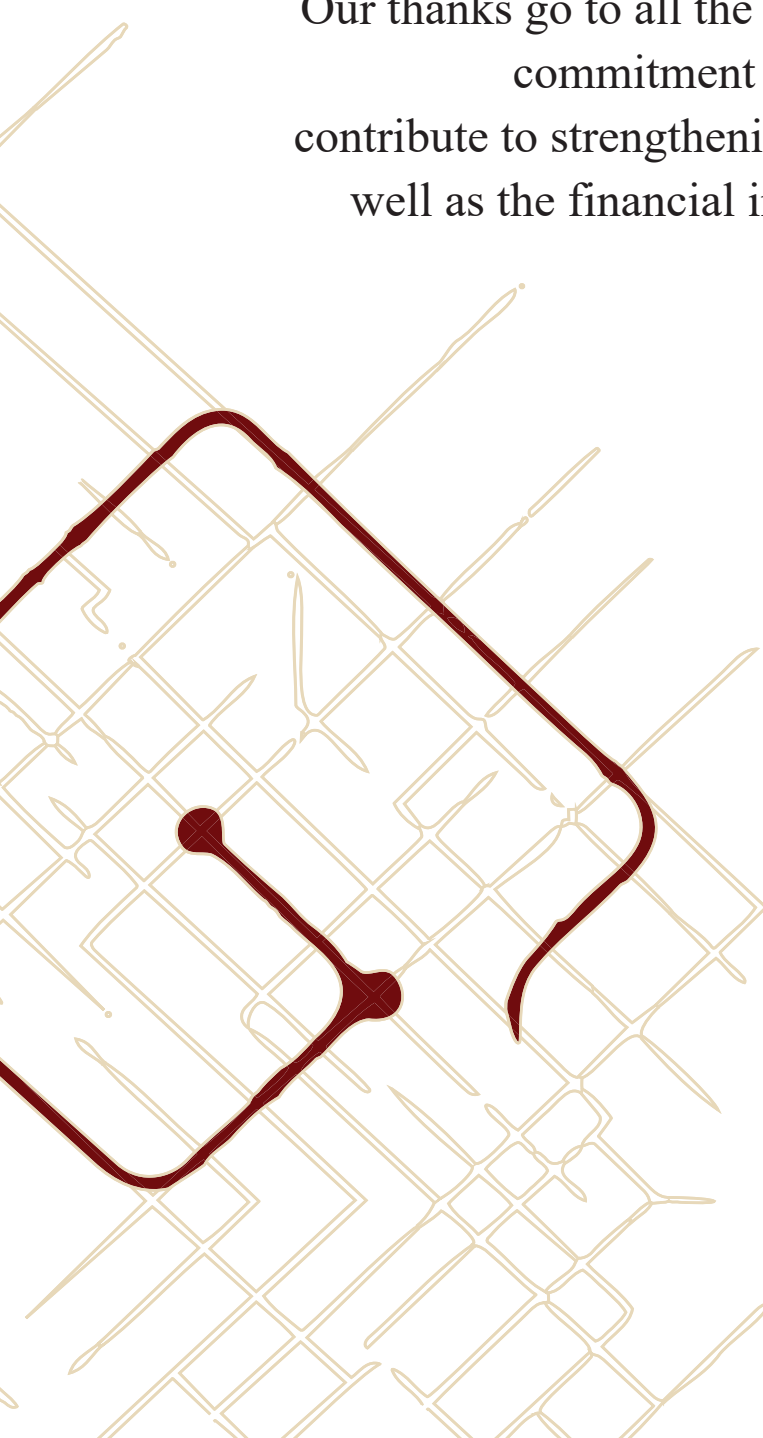
PROFESSIONALISM
AND INTEGRITY





**This report is an assessment of the joint efforts for
a secure, transparent and sustainable financial
system.**

Our thanks go to all the partners, who through their
commitment and cooperation
contribute to strengthening the preventive system as
well as the financial integrity of our economy.



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ABBREVIATIONS

BoA	Bank of Albania
CCFAML	Coordination Committee for the Fight Against Money Laundering
CEO	Currency Exchange Office
CHCIT	Chamber of Commerce and Industry Tirana
CoE	Council of Europe
Egmont	Network of Financial Intelligence Units in the World
EU	European Union
FATF	Financial Action Task Force
FIA	Financial Intelligence Agency
FIU	Financial Intelligence Unit
FSA	Financial Supervising Authority
GDC	General Directorate of Customs
GDSP	General Directorate of the State Police
GDT	General Directorate of Taxes
GIZ	German Agency for International Cooperation
GPO	General Prosecutor's Office
HPC	High Prosecutorial Council
HJC	High Judicial Council
IQC	Independent Qualification Commission
IT	Information Technology
ITWG	Inter-Institutional Technical Working Group
Moneyval	Committee of experts for Anti-Money Laundering Evaluation
ML/TF/PF	Money Laundering, Terrorism Financing and Proliferation Financing
NACC	National Agency for the Control of Cannabis
NACS	National Authority for Cyber Security
NACIS	National Authority for Classified Information Security
NBC	National Business Center
NBI	National Bureau of Investigation
NBFI	Non-Bank Financial Institution
NCHA	National Chamber of Advocacy
NCHN	National Chamber of Notaries
NPO	Non-Profit Organization
PEP	Politically Exposed Person
POB	Public Oversight Board
SAR	Suspicious Activity Report
SCA	State Cadastre Agency
SIS	State Information Service
SLA	Savings and Loans Association
SPACOC	Special Prosecution Office Against Corruption and Organized Crime

MESSAGE OF THE DIRECTOR GENERAL

Dear reader,

I have the pleasure to present the annual report of the FIA for the year 2025, which provides a complete overview of the activity, challenges and achievements in strengthening the preventive system against money laundering, terrorist financing and the proliferation of weapons of mass destruction.

The year 2025 was an intensive period, with the main focus on preparation for the 6th round of evaluation by the Moneyval Committee of the Council of Europe. In fulfilment of its role of national coordinator, FIA has led a broad inter institutional process, including the completion of technical and effectiveness questionnaires, simulation exercises, and specialised training, which have contributed to increasing capacities and improving interinstitutional coordination.

National and international cooperation remains a key pillar of our work. Effective coordination and information exchange, have been instrumental in increasing the effectiveness of the preventive system. The ITWG continued to play a key role in the coordination of policies, the exchange of information, and the monitoring of the preventive system.

During the year, ITWG admitted new members and intensified its activities in support of national priorities, including the implementation of the National Strategy 2024–2030 and the National Risk Assessment. The increase in the efficiency of ITWG has contributed to improving the implementation of preventive measures, the identification of priority areas, the increase of the professional capacities of the relevant institutions, and further strengthening the cooperation among public institutions and the private sector.

In the framework of increasing public awareness and strengthening cooperation with the private sector, FIA has organised financial education activities and implemented the integrated training plan, contributing to the increase of knowledge and compliance with legal requirements.

At the international level, our relations with partner financial intelligence units, as well as with organizations such as Moneyval, the FATF and the Egmont Group, have been essential in strengthening the role and credibility of the FIA. Through participation in conferences, meetings, training and AML/CFT evaluation processes, we have contributed to the exchange of best practices and to the acquisition of international experience.

During the year 2025, FIA held meetings with international delegations and engaged in numerous activities, further enhancing cooperation and international presence. The support of international partners has been essential in strengthening our institutional capacities and preparing for international monitoring processes.

FIA contributes to strengthening the integrity of the financial system and to preventing money laundering and terrorist financing. Through financial intelligence analysis, risk-based supervision and the effective implementation of the regulatory framework, we have sought to enhance compliance and the integrity of the preventive system. At the same time, FIA has continued to perform its core functions professionally, including the analysis and dissemination of suspicious cases, supervision, and cooperation with law-enforcement and regulatory authorities.

During 2025, cooperation with national authorities, law-enforcement bodies and regulatory institutions was further strengthened, with the aim of improving information exchange and increasing operational efficiency.

Looking ahead, 2026 is expected to bring new challenges, particularly as the country's evaluation process by the Moneyval Committee continues. With a view to progressive and sustainable inter-institutional development, I invite all public institutions and the private sector to deepen cooperation and intensify measures against money laundering, terrorist financing and the proliferation of weapons of mass destruction.

In conclusion, this report bears witness to the joint efforts of FIA and its partners. I express my gratitude to FIA staff for their commitment and professionalism, and to public authorities, institutional and international partners, as well as the private sector, for their continued support and cooperation.

Special thanks are also due to the reporting entities for their professionalism and dedication, as an essential link in strengthening the preventive system.

Thank you for your attention. I invite you to read this report and to continue working together towards our shared objective of a secure, transparent and sustainable financial system.

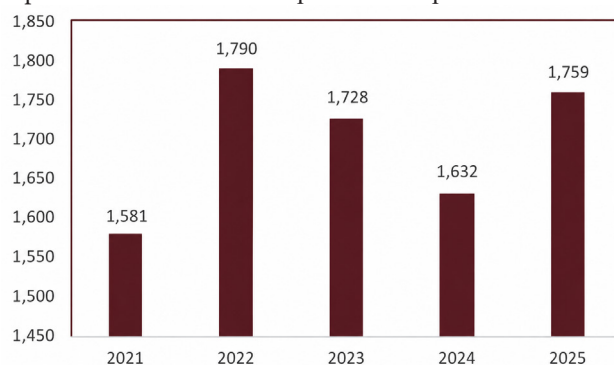
COLLECTION, ANALYSIS, DISSEMINATION OF FINANCIAL INFORMATION AND TEMPORARY FREEZING ORDERS

The main activity of the FIA, in its capacity as the Financial Intelligence Unit, is related to the analysis of information reported through SAR by the reporting entities, which is supplemented, when necessary, with additional data to support our conclusions. This process is of fundamental importance for the functioning of the institution, serving as the groundwork for the initiation of verifications and investigations, the dissemination of information to the competent authorities, the identification and updating of ML/TF typologies, risk assessment, the guidance of the reporting entities for the improvement of the preventive system, as well as the increase of efficiency in the prevention of and tackling of money laundering and terrorist financing. During 2025, 1,759 SAR were sent to the FIA by the reporting entities, which are presented categorized in table 1, compared with the preceding periods.

Table 1: Reported SARs, by category of entities for the period 2021 – 2025.

Reporting entity	2021	2022	2023	2024	2025
Banks	725	660	756	718	750
Money transfer companies	290	293	323	365	331
GDC	33	25	24	8	12
GDT	6	9	8	4	25
SCA	16	22	29	33	8
Notary	482	735	516	413	486
CEO	4	9	32	19	75
Micro-credit financial institutions	17	28	21	16	26
Financial leasing companies	1	0	5	6	6
Construction companies	2	0	1	0	0
Motor vehicle companies	0	3	3	8	3
Electronic payment company	0	1	1	26	25
Lawyers	1	0	0	0	0
Real Estate Brokers	0	0	1	5	5
Transport companies	0	0	0	0	0
Investment fund	0	0	1	0	3
Payment services	3	5	7	9	1
Gambling	0	0	0	2	2
Other	1	0	0	0	1
Total	1,581	1,790	1,728	1,632	1,759

Graph No.1: Trend of SAR reports for the period 2021 – 2025



Data in table no. 1, indicates a predominance of the reports submitted from banks, notaries and money transfer companies. The number of SAR in 2025 has increased by about 8%, compared with 2024. Compared with 2024, taken as a reference point, an increase is noted in the number of SAR submitted coming from banks (4.5%), notaries (17.7%), CEO (almost a threefold increase), GDT (almost a fivefold increase), and microcredit entities (62%). Meanwhile, a decrease is observed regarding SAR submitted from money transfer companies (9.3%), which still remain among the entities with a considerable share of SAR.

Table 2: Cases disseminated to law enforcement authorities for the period 2021-2025*.

Year	2021	2022	2023	2024	2025
District Prosecutor's Offices	21	13	19	31	24
SPACOC	29	10	26	36	32
GDSP	208	201	174	167	133
GDT	24	19	19	25	80
Total	282	243	238	259	269

* In the processed statistics of the year 2025, it has been assessed that the information sent to GDT should also be included. This element is also included in other years.

The analysis constitutes a complex and dynamic process, supported by a series of components, such as: the identified indicators, the preliminary and obtained information, as well as the cross-checking of data from different sources, with the aim of identifying and documenting suspicious cases that may be linked to money laundering, criminal offenses or criminal activities that generate proceeds of crime, the financing of terrorism, as well as the financing of weapons of mass destruction. The results of this process serve for the dissemination of cases for investigation to law enforcement agencies, intelligence bodies, or partner FIUs, depending on the jurisdiction and nature of the matter. One of the most important functions of FIA is the collection, analysis and dissemination of information on suspicious cases to the competent authorities, in particular to GDSP, the Prosecution Offices of general jurisdiction, as well as SPACOC. In this context, it should be emphasized that GDSP, as the competent authority in the country and specialised in carrying out investigative actions, remains the main institution for the cases referred by FIA. In addition to disseminating cases to the Prosecution and the Police, during 2025 FIA also disseminated 80 cases to GDT, concluded with suspicions of tax evasion, concealment of income, other violations of tax legislation, as well as other cases where it was assessed that GDT has the most appropriate expertise and competencies for handling them. During 2025, FIA submitted to SIS 57 intelligence reports, related to matters suspected of criminal activities, as an object of common interest and inter institutional cooperation. In addition to the submission of new cases, follow-up information is also of particular importance for FIA, through which additional and updated data are transmitted to the competent authorities, related to the information previously disseminated by FIA, as well as to the specific requests of these authorities following their verifications and investigations. In addition to the initial indications for the cases disseminated by FIA to law enforcement agencies, the main source remains the SARs submitted by the reporting entities, which served as the starting point for around 83% of the cases. The remainder consists of cases initiated on the basis of the strategic and sectoral analyses carried out by FIA, as well as other sources.

Table 3: Indicators for the cases disseminated during the year 2025 to GDSP, Prosecution and GDT

Indications	SARs	Partner FIUs	Strategic Analysis	Open Sources	Requests from institutions	Total
Prosecutor's Office	51	0	3	1	1	56
GDSP	95	1	34	1	2	133
GDT	79	0	1	0	0	80
Total	225	1	38	2	3	269

*In the processed statistics of 2025, it has been assessed to include also the information disseminated to GDT

The generation of cases having SARs as initial indication, is indicative of a preventive system that is functional and continuously being ameliorated. SARs provide an indication for the inception of an analysis, that is further enhanced and supplemented with additional data provided by reporting entities (e.g. banks, public notaries, etc.), partner FIUs or competent authorities.

All these data are analysed and assessed in an integrated manner, with the aim of concluding whether or not there are reasonable suspicions that may be linked to money laundering, criminal offences or criminal activities that generate proceeds of crime, as well as to the financing of terrorism. FIA pays particular importance also to identifying the modus operandi and methods used in the laundering of proceeds of criminal offences, as well as the financing of terrorism.

During 2025, the following indicators of suspicious activity have been identified:

- High value investments in real estate with an unknown or uncorroborated source of funds;
- Use of third parties to carry out transactions and investments, with no apparent connection to the parties or to the activity, for the purpose of concealing the origin of the proceeds.
- Donations and loans (from/to third parties) without clear relationships justifying the transactions between the parties, as well as transactions with suspicions about the source of the funds and negative findings for the parties involved.
- Financial transactions related to suspicions of tax evasion or concealment of income.
- Transactions carried out by persons suspected of involvement in previous criminal activities, or with links to persons with criminal records.
- Suspicious transfers (incoming, outgoing, as well as attempted ones), involving foreign entities and nationals, unjustified by supporting documentation.
- Cash deposits, with a source of funds that is unknown or unjustified.
- Transactions with suspicions of possible fraud, including financial and computer fraud.
- Buying and selling of shares of legal entities at prices significantly lower or higher than the value of the company's net capital.
- Suspicious capital increases by legal entities, with unknown sources of income or with fictitious elements.
- Significant transfers of values (within and outside the country) between legal persons, unsupported by reliable documentation for the goods or services exchanged
- Suspicious transfers unsubstantiated with any supporting documentation, with countries considered risky.
- Suspicious or abnormal transactions, conducted by PEPs, former PEP, family members or their business associates.
- Purchase of immovable property below market value.
- The involvement of the same or related persons in multiple businesses, for the purpose of circulating funds, concealing their origin and destination, through the chain of transactions in several countries.

Based on FIA's disseminated cases to the law enforcement authorities during 2025, a number of relevant typologies suspected of money laundering have been compiled (reflected in Annex 1, of the report), with the purpose of informing reporting entities as well as the general public, in accordance with the current legal provisions.

During the analysis of the disseminations to law enforcement agencies, when possible or supported by the data available, FIA seeks to identify the predicate offence as well as possible criminal links of persons and entities

Table 4: Categorization of predicate offences during 2021 – 2025*.

Predicate offence	2021	2022	2023	2024	2025
Trafficking of narcotics	39	44	47	45	41
Trafficking of human beings, sexual exploitation	3	6	1	2	4
Financial operations from criminal organizations	11	6	10	7	9
Terrorist financing	3	7	5	4	2
Fraud, cybercrime	21	16	20	15	12
Forgery	3	5	4	3	3
Abuse of power and corruption	21	7	13	17	6
Non-declaration of cross border transportation of cash and valuables	0	0	0	1	2
Theft, robbery, coercion	1	4	7	4	5
Trafficking of motor vehicles / evasion of customs duties / smuggling	0	2	0	0	1
Suspicious of tax evasion / (concealment of income)	28	23	25	31	85
Previous criminal proceedings	7	20	16	28	10
Assistance for illegal border crossing or illegal immigration	0	8	3	11	3
Offences related to banking and financial activity	0	0	0	2	2
Illegal possession of arms, explosives and ammunitions	0	0	0	1	1
Unknown	145	95	87	88	83
Total	282	243	238	259	269

* In the processed statistics of the year 2025, it has been assessed to also include the information disseminated to GDT. This element has also been included in other years.

This table represents the cases disseminated to the law enforcement bodies, the Prosecutor's Office, GDSP and GDT, for which it has been possible to determine the underlying predicate offence.

In 2025, the highest number of criminal activities, for which it was possible to identify the link with the predicate offence, consist of crimes related to narcotics, tax evasion, fraud and cases where persons involved have had previous criminal records or proceedings.

Similarly to previous years, for a considerable number of cases it has not been possible to determine the originating criminal offence. However, from the financial analysis it has been concluded that:

- Financial transactions presented anomalies or obvious suspicions;
- The funds used did not have legal sources and were unsubstantiated by documentation or other reliable data;
- The economic and legal purpose of the transactions was unclear or suspicious;
- The transactions had similarities to known typologies of money laundering, both at national and international level.

Pursuant to the principle “follow the money”, as one of the fundamental principles of the work of the FIU, these cases are disseminated for further follow-up to law enforcement agencies, with the aim of fully verifying the circumstances and identifying elements that may indicate criminal activity or the underlying predicate offence.

Temporary freezing orders

In cases where the FIA has reasons grounded on concrete facts and specific circumstances for ML/FT, for the purpose of preventing the alienation of criminal financial proceeds, orders the temporary freezing of the financial transaction, for a period of up to 72 hours. This information is submitted to the Prosecution and if deemed necessary to other law enforcement agencies.. During 2025, a total of 8 temporary freezing orders were issued for bank accounts, in a total value of 793,375 EUR, which have been seized by decision of the Prosecution Office or the Court in the amount of 96%.

Table 5: Freezing orders and seizures (in EUR) for the period 2021 - 2025.

Year	No. of freezing orders	Total amount frozen (EUR)	Total amount seized (EUR)	Percentage (seized vs frozen)
2021	3	250,240	200,000	80%
2022	3	2,426,882	2,426,882	100%
2023	4	1,178,350	1,100,350	93%
2024	11	10,751,684	10,418,238	97%
2025	8	793,375	763,375	96%



**COLLECTION, ANALYSIS, DISSEMINATION OF
FINANCIAL INFORMATION AND TEMPORARY
FREEZING ORDERS**

AWARENESS RAISING OF THE REPORTING ENTITIES AND COMPLIANCE ANALYSIS

Awareness raising of reporting entities

The reporting entities of the Law no. 9917/2008 “On the prevention of money laundering and terrorist financing”, as amended, have a primary role in preventing the depositing, use and transfer of illegal proceeds in the country's economic-financial system and as such constitute the first line of defense.

In 2025, FIA has continued its work to improve the level of compliance of entities, in accordance with the AMLF/CFT/PF legal framework.

Training of the entities of the law on AML/CFT/PF issues remains one of FIA's functional tasks.

In this context, in 2025, a series of training activities were organised for several categories of reporting entities (Banks, NBFIs, CEOs, money transfer companies and their agents, investment funds and private pensions, statutory auditors, traders of precious metals and stones, notaries, certified accountants, casinos and real estate agents) in which participated 1,080 persons, that constitutes an increase of 18% compared to 2024 (917 participants).

FIA's trainings are organised on the basis of the integrated training plan approved by the ITWG for the year 2025, the training requests submitted by the associations or the reporting entities, as well as based on the deficiencies identified within the framework of the inspections carried out by the institution.

The training activities have also been developed within the framework of cooperation with the associations that represent different categories of reporting entities.

The emphasis during this year has been placed on the organisation of training for notaries (in cooperation with NCHN), real estate intermediaries (in cooperation with NAREA) and certified accountants (in cooperation with the Association of Accountants and Financiers of Albania and the Institute of Certified Public Accountants).

Through cooperation with associations and supervisory and licensing authorities, FIA has aimed to present experience in the field of AML/CFT/PF as well as to assess the level of compliance of entities with the legislation in force.

The training process has been carried out according to FIA's annual plan for 2025, which highlights the main areas, with particular emphasis on the effective implementation of AML/CFT/PF measures, customer due diligence and enhanced due diligence, the individual assessment of ML/TF risk by the entities and the categorisation of their customers on the basis of this assessment, the monitoring of the business relationship with PEPs, changes in AML/CFT legislation, the analysis and reporting of complex transactions, ML/TF typologies and indicators, the identification and verification of the beneficial owner of legal persons, the implementation of international sanctions for persons designated under the resolutions of the United Nations Security Council, addressing the recommendations of the FATF, of the Committee Moneyval and other monitoring institutions, etc.

Regarding the training activities carried out in 2025, FIA has aimed to extend their effect to all categories of reporting entities, particularly focusing on those entities that are categorised as medium and high risk for ML/TF.

The following table represents periodic data regarding the number of persons trained and relevant categories.

Table 6: Number of persons trained for the period 2021 - 2025, by categories of entities.

Reporting entity	2021	2022	2023	2024	2025
Banks	4	20	-	30	30
CEO and money transfer agents	42	15	332	219	25
Transfer Companies	-	-	-	-	4
NBFIs	24	26	18	6	11
Gaming companies	1	2	3	-	10
Notaries and Lawyers	199	63	30	4	395
Auditors	26	9	1	255	2
Insurance companies	1	11	1	10	
Supervisory Authorities and Institutions	5	4	-	-	23
Car dealers	-	2	-	1	1
NPO	2	1	-	-	
Construction companies	18	12	9	-	2
Enterprise companies of collective investments and pension funds	-	1	2	17	1
Real estate agents	6	23	20	70	66
Travel agencies	1	2	-	-	3
SLA	1	7	-	-	
Certified accountants	540	153	256	305	506
Private bailiffs	-	-	5	-	
Dealers of Precious Metals and Stones	-	-	-	-	1
Total	870	362	677	917	1,080

FIA's on-site and off-site inspections of reporting entities have an important role in increasing their AML/CFT/PF capacities .

These inspections, in addition to oversight of the implementation of legal obligations, also provide the relevant assistance with regard to the continuous implementation of legal obligations, accompanying it also with practical cases from their line of work.

The training and communication process plays a decisive role in promoting awareness and understanding by entities of the AML/CFT/PF legislation, through continuous engagement, dialogue and cooperation. This function provides guidance to entities, ensuring clarity in the interpretation and implementation of their risk-based AML/CFT obligations.

These activities foster a culture of compliance, equipping entities with the required knowledge and expertise to effectively implement AML/CFT/PF measures.

Compliance Analysis, on site and off-site inspections

FIA exercises the process of supervision of reporting entities, based on paragraph ‘ç’ of Article 22 “Duties and functions of the responsible authority”, of Law No. 9917/2008 “On the prevention of money laundering and terrorist financing”, as amended. In this context, the compliance of reporting entities with the requirements of ML/TF/PF legal and sublegal acts, constitutes one of the main objectives of FIA’s supervisory activity. To ensure the effectiveness of the compliance supervision process, FIA’s work in 2025 has been oriented towards those categories of entities which are categorised as having a high or medium level of ML/TF risk.

In this framework, the FIA has paid continuous attention to the effective use of human and technical resources, with the aim of ensuring the widest possible impact on the level of compliance of entities, by carrying out, alongside the inspection process, the training of reporting entities. Coordination and cooperation with the supervisory and licensing authorities has been one of the main components of the FIA's activity in 2025.

In this context, in cooperation with the BoA and Gambling Supervisory Authority, joint inspections have been carried out at the entities subject to the law. In the table below, the data for the on-site and remote inspections for the year 2025 are presented, compared with the preceding periods.

Table 7: On-site and off-site inspections for the period 2021 -2025.

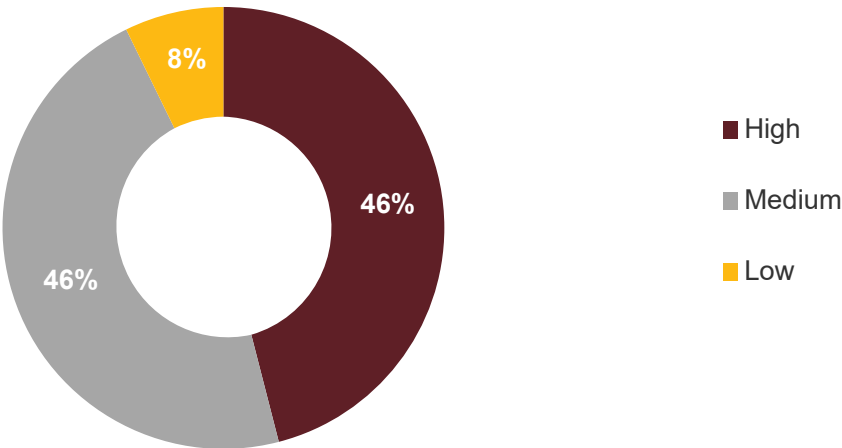
Nr.	Entities	2021		2022		2023		2024		2025	
		On-site	Off-site	On-site	Off-site	On-site	Off-site	On-site	Off-site	On-site	Off-site
1	Banks	5		3		4		3		4	
2	NBFI	7	5	1	1	6	1	7	3	5	
3	CEO	4	20	7	10	4	16	2	2	8	11
4	Certified accountants				5	2	10	3	2		3
5	Construction Companies	9	14	7	5	2	3	1	5	3	18
6	Car Dealers					2	1	1	2		
7	Notaries	7	31	8	14	2	3	2	18	3	21
8	Gaming companies			1		5	1			6	
9	Life insurance	1		3				2			
10	Law Firms	9	19	6				2		2	4
11	SLA			1	8			1			
12	Precious metals			1							3
13	Real estate			2	3	2	7	2	8	5	8
14	Investments and pension funds			2				2	1		
15	Travel agencies		1				1		1	2	1
16	Private bailiff			2	18		1				
	Sub-total	42	90	44	64	29	44	28	42	38	69
	TOTAL	132		108		73		70		107	

1 Two (2) inspections in Bank and CEO.

2 Six (6) inspections in casinos.

For the year 2025, 40 on-site inspections were planned, of which 38 were carried out, while , out of 73 planned off-site inspections, 69 were carried out. The total number of inspections in 2025 marked an increase of 53%, compared to 2024. The FIA supervision process focused on inspections of high-risk entities (Banks 4 inspections, construction companies 21 inspections, Notaries 24 inspections) totaling 49, which account for 46% of inspections, while the remaining part includes medium-risk entities 46% and low-risk entities 8%.

Graph No.2: Graphical presentation of the risk level for the entities inspected during 2025:



Based on the results of the inspections, it is observed that the entities are generally engaged in compliance with the legal and regulatory requirements. However, out of 107 inspections carried out, in 67 cases (63%) administrative violations were identified, for which 27 administrative measures “Fine” and 37 measures “Warning” were proposed.

3 According to the risk categorization of entities in the National Risk Assessment for the year 2023.

ADMINISTRATIVE MEASURES AND JUDICIAL PROCEEDINGS

Administrative measures

During the period January-December 2025, entities were identified that did not meet the adequate level of compliance with the regulatory AML/CFT framework, for which the process of reviewing administrative violations continued, up to the issuance of the reasoned decision with the administrative measure “fine” or “warning”, in accordance with the relevant legal provisions. In addition to on-site inspections, off-site supervision practices were also assessed through Remote Control Reports or indications from the remote monitoring of entities subject to the law for breaches of legal obligations, which also account for the main share, compared to on-site inspections. During this period of the year, a total of 67 entities were taken under review by the Administrative Violations Review Commission, divided by categories as identified below.

Table 8: Administrative offenses examined by categories of entities

Entities	No. of reviews
Notary	17
CEO	15
Auditing Company	1
Travel Agencies	3
Real estate	6
NBFI	6
Construction Companies	11
Car Dealers	3
Life insurance	1
Precious metals	2
Gaming companies	2
TOTAL	67

Upon the review of the administrative procedures, the FIA concluded by imposing the administrative measure “Fine” on 27 entities, the administrative measure “Warning” on 37 entities, and for 3 entities dismissal of the administrative offence proceedings.

Table 9: Administrative sanctions imposed, categorized by entities.

Entities	Administrative sanction "Fine"	Administrative sanction "Warning"	Decision to terminate	No. of cases reviewed
Notary	4	12	1	17
CEO	8	7	-	15
Auditing Company	1	-	-	1
Travel Agencies	2	1	-	3
Real estate	1	4	1	6
NBFI	3	3	-	6
Construction Companies	5	6	-	11
Car Dealers	1	2	-	3
Life insurance	1	-	-	1
Precious metals	1	1		2
Gaming companies	-	1	1	2
TOTAL	27	37	3	67

The minimum fine applied for the year 2025 was 100,000 Lek and the maximum one was 800,000 Lek. The total value of the fines imposed is 8,700,000 Lek. The following administrative fines have been imposed according to the category of the entities:

Table 10: Value of administrative fines by entities

Entities	No. of Entities	Value of administrative sanctions in Lek
Notary	4	1,600,000
CEO	8	2,900,000
Audit Company	1	200,000
Real estate	1	400,000
NBFI	3	900,000
Construction company	5	1,400,000
Travel Agencies	2	600,000
Car Dealers	1	200,000
Life insurance company	1	400,000
Precious metals	1	100,000
TOTAL	27	8,700,000

The typology of the administrative offences identified for the reporting entities consists mainly of violations categorised as follows:

- Failure to comply with the obligations arising from Article 4/1, on taking measures within the framework of due diligence of the law;
- Failure to comply with the obligations arising from Article 5, on record keeping for customer identification;
- Failure to comply with the obligation to carry out due or enhanced diligence through the retention of transactional analyses, according to Article 8, paragraph 7 of the law;
- Failure to comply with the obligations arising from Article 11, paragraph 1/c of the law, regarding keeping the centralised register in accordance with legal requirements;
- Failure to report threshold currency transactions according to paragraph 3, of Article 12 of the law.

The following table presents the comparative data, regarding the administrative sanctions imposed according to the category of entities under supervision, for the last 5 years.

Table 11: Comparative data on the administrative measures “fine” for the period 2021-2025.

Entities	2021		2022		2023		2024		2025	
	No	Amount	No	Amount	No	Amount	No	Amount	No	Amount
Banks	-	-	-	-	1	1,000,000	-	-	-	-
NBFIs	1	300,000	1	1,000,000	-	-	-	-	3	900,000
CEO	4	1,100,000	3	700,000	11	5,600,000	2	1,000,000	8	2,900,000
Notary	12	3,000,000	3	1,300,000	2	900,000	4	1,300,000	4	1,600,000
Construction companies	6	3,800,000	3	1,200,000	-	-	3	900,000	5	1,400,000
Car Dealers	-	-	-	-	-	-	-	-	1	200,000
SLA	-	-	-	-	1	1,000,000	1	1,000,000	-	-
Real Estate Agents	-	-	-	-	-	-	2	400,000	1	400,000
Auditors	-	-	-	-	-	-	-	-	1	200,000
Travel agencies	-	-	-	-	-	-	-	-	2	600,000
Precious metals	-	-	-	-	-	-	-	-	1	100,000
Life insurance	-	-	-	-	-	-	-	-	1	400,000
TOTAL	23	8,200,000	10	4,200,000	15	8,500,000	12	4,600,000	27	8,700,000

Execution of Administrative sanctions

During 2025, of the 27 administrative measures “fine” imposed, 20 of them have been collected in the amount of fine imposed by FIA and for one (1) entity an agreement has been concluded for payment in instalments.

In total, the amount collected for the administrative measures pertaining to the year 2025 is 7,000,000 Lek. During the year 2025, the administrative measures of debtors from previous years were also collected, according to the data presented in the table below. The total amount collected during this year amounts to 18,285,956 Lek.

Table 12: Data regarding collection of sanctions during the period 2021 – 2025

The entities	2021	2022	2023	2024	2025
Decisions with Fines	23	10	14	15	27
The total amount of fines in Lek	8,200,000	4,200,000	7,900,000	8,500,000	8,700,000
The total amount of collection in Lek	5,837,638	6,162,005	4,800,000	6,042,400	18,285,956

To increase the efficiency of the execution of administrative measures, FIA has closely followed the stages of execution with the bailiff offices, thereby also increasing the efficiency of this activity, up to the completion of the stages of compulsory execution by moving to enforcement procedure and cooperating closely with the State Bailiff Offices.

Judicial proceedings

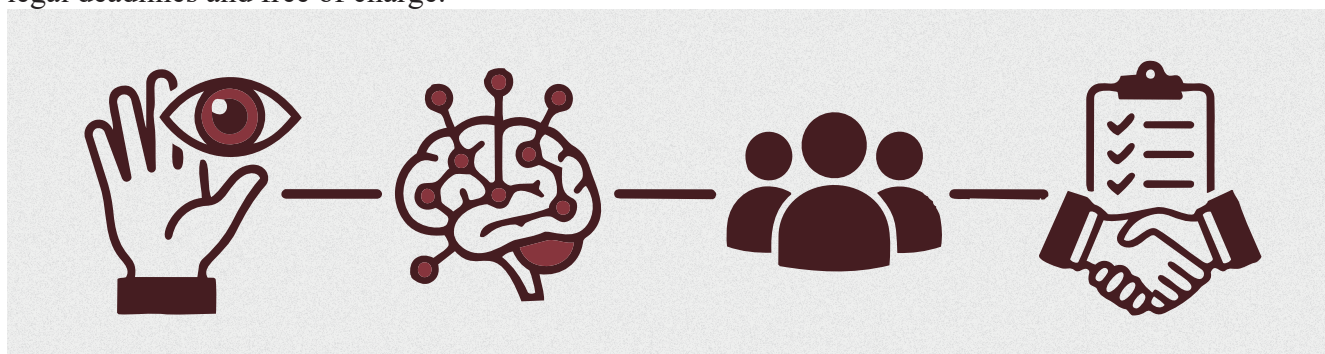
FIA has paid particular attention to the follow-up of court proceedings, related to the administrative sanctions imposed during 2025 as well as the court cases carried over from previous years. There are a total of 17 (seventeen) court proceedings for which the Administrative Court of First Instance has issued a decision, of which:

- In 13 (thirteen) proceedings, the Court has ruled in FIA's favor;
- For 2 (two) proceedings, the Court has partially accepted the plaintiffs' claim;
- For 2 (two) proceedings, the Court has ruled plaintiff's favor.

During 2025, the Administrative Court of Appeal, has issued decisions for 2 (two) proceedings ruling in both of them in FIA’s favor.

Coordinator for the right to information

During 2025, FIA administered and responded in accordance with the the legislation for the right to information to 15 requests, of which 3 were addressed by journalists from television or print media and 12 of them were requests addressed by the public. For all 15 requests, FIA has responded within the legal deadlines and free of charge.



NATIONAL COOPERATION

Coordination Committee for the Fight Against Money Laundering Interinstitutional Technical Working Group

The ITWG established in implementation of CCFAML Decision no. 1, dated 27 December 2023, has continued during 2025, to exercise its functions and activities in fulfillment of the following priorities:

- Preparation for the 6th round of evaluation by the Moneyval Committee;
- Continuation of the implementation of the Action Plan of the “National Strategy for the prevention of money laundering and terrorist financing 2024–2030”;
- Continuation of the implementation of the Action Plan of the “National Risk Assessment” (NRA);
- Coordination and engagement in the implementation of the “Strategy for public education on the risk posed by money laundering and the financing of terrorism in our society 2025–2027”;
- Coordination of the meetings of the ITWG subgroups.

During 2025, three new institutions joined I TWG: the Center Against Violent Extremism (CVE), the Albanian Microfinance Association (AMA) and the CHCIT, increasing the number of ITWG members to 38 members.

Summary of ITWG activities for 2025

During 2025, ITWG has undertaken a series of important activities, in support of the fulfilment of its priorities as well as played an important role in interinstitutional coordination, information exchange and cooperation between public institutions and representatives of the private sector regarding AML/CFT. ITWG has conducted regular meetings during 2025, reflected in a summarised form hereunder:



Training for Albania's 6th round of evaluation by the MONEYVAL Committee (11–12 March 2025)

On 11–12 March 2025, a two-day training was conducted by two representatives of the Secretariat of the Moneyval Committee, within the framework of the 6th round of Albania's evaluation.

This training activity was attended by 120 participants, members of the ITWG, representatives of public institutions, including law enforcement and supervisory institutions, as well as representatives of the private sector.

During the first day, the participants were informed about the procedures and deadlines for the evaluation of the 6th round, as well as the main changes to the FATF standards and methodology (anti-money laundering standards that serve as the basis for the evaluation of states at the global level).

Representatives of the public sector, such as the FIA, the NBC, the BoA and the FSA, provided presentations on their respective sectors, including risk assessment, transparency of beneficial ownership, supervision of financial institutions and virtual asset service providers.

At the conclusion of the sessions, valuable comments and suggestions were given regarding reporting during the assessment process, as well as for the necessary remedial interventions in the preventive system.

On the second day of the training, representatives of the Moneyval Secretariat conducted simulated interviews with the Albanian authorities, regarding ML/FT criminal proceedings, the seizure and confiscation of criminal assets, the supervision and control of possible criminal links of designated non-financial businesses and professions (DNFBP), as well as the mechanisms and supervision of the implementation of financial sanctions for designated persons and entities.

Meeting of the ITWG – 4 April 2025

ITWG convened on 4 April 2025 with the participation of permanent members, representatives of public institutions and the private sector. Under the guidance of the General Director of FIA, the meeting focused on the following agenda items:

- Albania's 6th round assessment by the Moneyval Committee, the completion of the questionnaires and the respective deadlines;
- Preparatory measures for immediate outcomes IO1, IO4, IO5 and IO9;
- Information on the implementation of the “National Strategy for the Prevention of Money Laundering and Terrorist Financing 2024–2030”, the “National Risk Assessment” and the “Strategy for public education on the risk posed by money laundering and terrorist financing in our society”;
- Discussion on the implementation of the Integrated Training Plan;
- Continuation of the implementation of the priorities of ITWG for 2025.

The importance of completing the questionnaires within the framework of the 6th evaluation round accurately and qualitatively, complying with the deadlines for their completion, as well as collecting complete and comprehensive statistics was particularly emphasised during the meeting.

ITWG Meeting –18 July 2025

ITWG convened on 18 July 2025 with the participation of permanent members, representatives of public institutions and the private sector. Under the guidance of the General Director of FIA, the meeting focused on the following agenda items:

- Information on completing the Technicality Questionnaire and the Effectiveness Questionnaire within the framework of the 6th round of Albania's evaluation by Moneyval;
- Monitoring of the implementation of the “National Strategy for the Prevention of Money Laundering and Financing of Terrorism 2024–2030” and its action plan, during January–April 2025;

- Monitoring of the implementation of the “National Risk Assessment” and its action plan, during January–April 2025;
- The discussion on the implementation of the Integrated Training Plan and the “Strategy for educating the public on the risk posed by money laundering and the financing of terrorism in our society” and its action plan;
- The activity of the ITWG subgroup “On the collection and quality of information for criminal investigations related to ML/TF”.

During the meeting FIA underlined the importance of the 6th round of evaluation by Moneyval and the necessity of the accurate and high-quality completion of the questionnaires, as well as compliance with the deadlines for their completion, so that the most effective result possible is achieved, as well as the strengthening of inter-institutional cooperation and the continuation of the implementation of measures and strategies in the fight against money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction.

Meeting of ITWG –19 September 2025

ITWG convened on 19 September 2025 with the participation of permanent members, representatives of public institutions and the private sector. Under the guidance of the General Director of the FIA, the meeting focused on the following agenda items:

- Completion and contribution by the institutions for the Technicality Questionnaire and the Effectiveness Questionnaire of the 6th Round by Moneyval;
- Presentation of the implementation of the action plan of the National Risk Assessment (NRA) on the need to update the measures of this plan in relation to the risks in the prevention of money laundering, financing of terrorism and weapons of mass destruction;
- Monitoring of the implementation of the “National Strategy for the Prevention of Money Laundering and Financing of Terrorism 2024 – 2030” and its action plan for the period May- August 2025;
- Discussion on the implementation of the Integrated Training Plan and the “Strategy for public education on the risk posed by money laundering and the financing of terrorism in our society” and its action plan.

Participating institutions, public and private, reported on the progress of the contribution made to complete the questionnaires of the 6th evaluation round by Moneyval. FIA emphasized the need for accountability and maximum commitment by all institutions, in meeting the deadlines and completing all information accurately and qualitatively.

The meeting of the ITWG –12 November 2025

ITWG convened on 12 November 2025 with the participation of permanent members, representatives of public institutions and the private sector.

The meeting was held also with the special participation of Mr. Philipp Arnold, Deputy Ambassador of Switzerland to Albania, who during his speech presented the activities of the new project supported by the Swiss Government (through the State Secretariat for Economic Affairs – SECO) and the Council of Europe, which will be implemented in Albania, as well as the ways in which Albanian institutions will benefit from this project. Under the guidance of the General Director of the FIU, the meeting focused on addressing the agenda items covering the four-month period May–August 2025 in relation to:

- Completion of the effectiveness questionnaire of the 6th round of evaluation;
- Implementation of the action plan of the National Strategy for the Prevention of Money Laundering and the action plan of the National Risk Assessment (NRA);
- Presentation of the Integrated Training Plan and the implementation of the “Strategy for educating the public on the risk posed by money laundering, terrorism financing and weapons of mass destruction in our society”.

During the meeting, all participating institutions discussed the progress of completing the Effectiveness questionnaire and reported on their progress.

FIA once again highlighted the need for the accurate and high-quality completion of the questionnaires, as well as compliance with the specified deadlines, and reiterated its readiness to continue providing assistance to all institutions during the process of completing the questionnaires, in order to ensure a tangible and successful outcomes.

Meeting of ITWG –22 December 2025

ITWG convened on 22 December 2025 with the participation of permanent members, representatives of public institutions and the private sector. Under the guidance of the General Director of FIA, the meeting focused on addressing the following agenda items:

- Progress regarding the the completion of the Effectiveness Questionnaire. Institutions reported on the progress made and the need for assistance during this process;
- Drafting of the Integrated Training Plan for the year 2026, and exchange of views on the training needs, priority areas and inter-institutional coordination of the training activities.



Participating institutions, public and private, reported on the progress of the contribution made to complete the questionnaires of the 6th evaluation round by Moneyval. FIA emphasized the need for accountability and maximum commitment by all institutions, in meeting the deadlines and completing all information accurately and qualitatively

Implementation of Strategic Documents

Reform Agenda

FIA is one of the implementing institutions of the Reform Agenda (Reform and Growth Facility 2024-2027/ Growth Plan for Western Balkans Countries), a document that has special importance as it serves as a measure of progress, where the full achievement of the defined objectives affects the acceleration of Albania's socio-economic development and further consolidates the country's integration process into the EU. The Reform Agenda consists of 6 main objectives which are addressed through concrete and measurable actions. Objective 5 “Rule of Law” action item 5.3, two specific measures have been included for implementation by FIA:

- (i) Adoption of a strategy for the prevention of money laundering and terrorist financing and
- (ii) Timely and effective implementation of the the Action Plan related to the National Risk Assessment (NRA).

In this framework, FIA continuously follows the implementation of the two measures of 5.3.1, of which the first one has been implemented since July 2024 with the approval of the National Strategy for the prevention of money laundering and terrorist financing. The second measure is related to the implementation of the action plan of the National Risk Assessment and is currently being implemented in the process of implementation, with a completion deadline in 2027.

Both documents are monitored on a four-monthly basis by the ITWG with the participation of representatives of public institutions and representatives of the private sector.

National Strategy for the Prevention of Money Laundering and Terrorist Financing

“The National Strategy for the Prevention of Money Laundering and Terrorist Financing 2024 - 2030 and its action plan” was drafted in close partnership between representatives of public institutions and representatives of the private sector, members of ITWG, in implementation of decision no. 1 dated 27.12.2023 of the CCFAML.

Thanks to the support of GIZ in Albania and the Council of Europe Office in Tirana, the strategy document was reviewed by two experts, at the national and international level, aligning this document with the best international standards in the fight against ML/TF. The National Strategy Document has also been translated into English. The Strategy is a comprehensive document and in the action plan (2024 – 2027) it has 6 main objectives and 50 measures, assigning all members of the ITWG, including the private sector, to implement the measures, in accordance with their remit.

NATIONAL STRATEGY FOR THE PREVENTION OF *Money Laundering and Terrorism Financing*

2024-2030



July 2024

In fulfilment of its coordinating role, FIA communicated with institutions involved in writing as well as via emails, regarding the progress made for the implementation of the relevant measures.

Timely fulfillment of the measures provided for in the Action Plan, requires constant commitment and periodic reporting (every 4 months) from each institution involved, taking into consideration that their fulfillment is an indicator of country's AML/CFT effectiveness, an indicator expected to be assessed also by the Committee Moneyval, within the framework of the 6th round of Albania's evaluation.

During 2025, most of the relevant measures, summarised hereunder, were implemented:

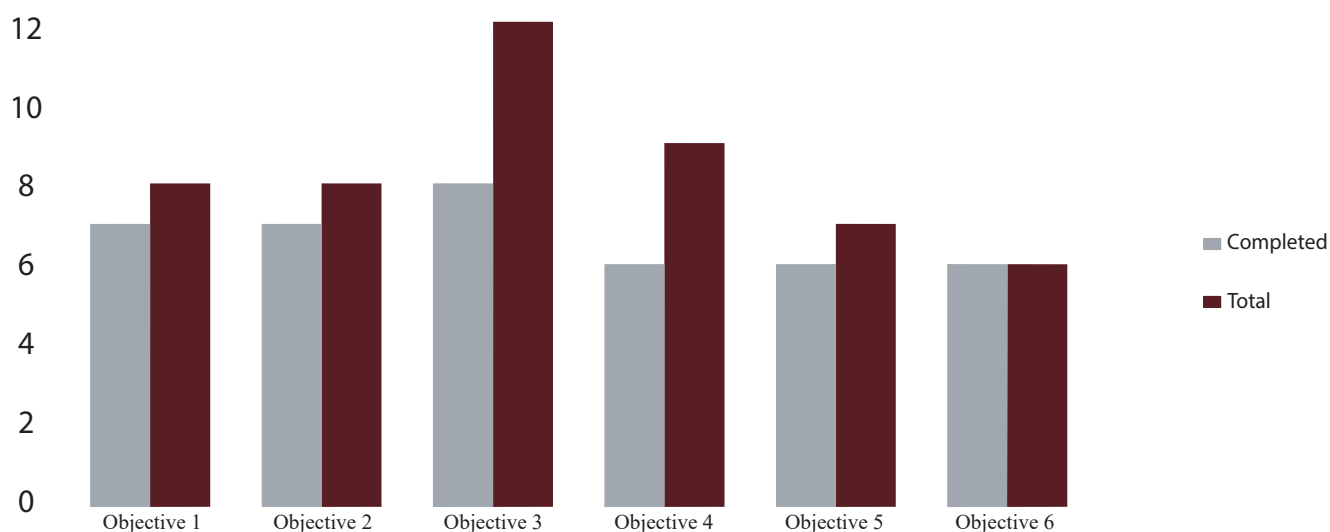
- Creation and functioning of inter-institutional groups to focus on high-risk sectors, combining expertise from regulators, law enforcement agencies, the private sector and other agencies related to AML/CFT;
- Consolidation of inter-institutional cooperation through the expansion of the number of reporting institutions and entities that participate in the meetings of the ITWG
- Drafting and implementation of a comprehensive training plan by public institutions, supervisory authority and representatives of the private sector.

Of the 50 measures contained in the national strategy, for the year 2025, 40 measures have been fully implemented and 10 measures are in process with an implementation deadline in 2026.

Table 13: Monitoring of the Action Plan for the year 2025

Objective	Completed	In progress	No action/ No reporting	Total
Objective 1	7	1	-	8
Objective 2	7	1	-	8
Objektivi 3	9	3	-	12
Objective 4	7	2	-	9
Objective 5	4	3	-	7
Objective 6	6	-	-	6
Total	40	10	0	50

Graph No. 3: Action plan for 2025



Action Plan for the National Risk Assessment for ML/TF (NRA)

The implementation of the measures of the Action Plan of the National Risk Assessment for ML/TF was monitored continuously. This plan has a 3-year timeline and contains 48 measures.

During 2025, most of the relevant measures of the action plan, summarised hereunder were implemented:

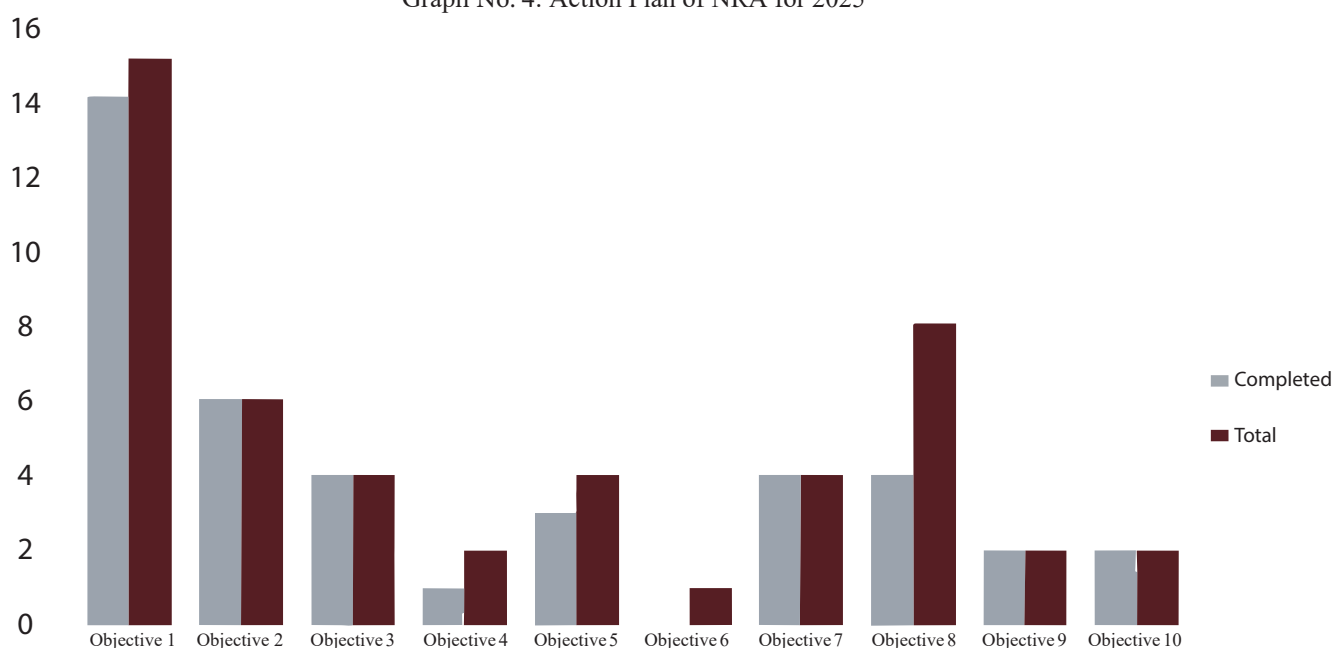
- Two summary documents on indicators and typologies related to criminal offences of corruption and tax evasion have been prepared and distributed to the private and public sector;
- Training activities have been organised with the participation of representatives of law enforcement, intelligence and supervisory institutions;
- Inter-institutional meetings were held at the Prosecutions Offices of General Jurisdiction of Elbasan, Vlorë, Durrës, Fier, Tirana for the purpose of exchanging experiences and best practices.

Of the 48 measures contained in the NRA Action Plan, for the year 2025, 40 measures have been fully implemented and 7 measures are in process with an implementation deadline in 2026. Only 1 measure, is still without action.

Table 14: Monitoring of the NRA Action Plan for the year 2025

Monitoring Action Plan January - December 2025				
Objective	Completed	In progress	No action/ No reporting	Total
Objective 1	14	1		15
Objective 2	6			6
Objective 3	4			4
Objective 4	1	1		2
Objective 5	3	1		4
Objective 6		1		1
Objective 7	4			4
Objective 8	4	3	1	8
Objective 9	2			2
Objective10	2			2
Total	40	7	1	48

Graph No. 4: Action Plan of NRA for 2025



The strategy for educating the public on the risk of ML/TF in our society

Within the framework of the implementation of the “Strategy for educating the public on the risk posed by money laundering and the financing of terrorism in our society”, 10 meetings on financial education were organised, specifically with:

- National Chamber of Notaries on 31 January 2025;;
- Institute of Authorized Accounting Experts on 5 February 2025;
- Association of Builders of Albania, on 11 February 2025;
- Albanian Association of Banks, on 12 February 2025;
- Albanian Foreign Exchange Association, 18 February 2025;
- Albanian Microfinance, on 20 February 2025;
- Association of Real Estate Intermediaries, on 25 February 2025;
- CHCIT, on 28 March 2025.

The purpose of these meetings is to raise public awareness on ML/FT issues and to strengthen cooperation with the private sector, bearing in mind the awareness of customers on these issues, as well as the risk that this phenomenon poses to our society.

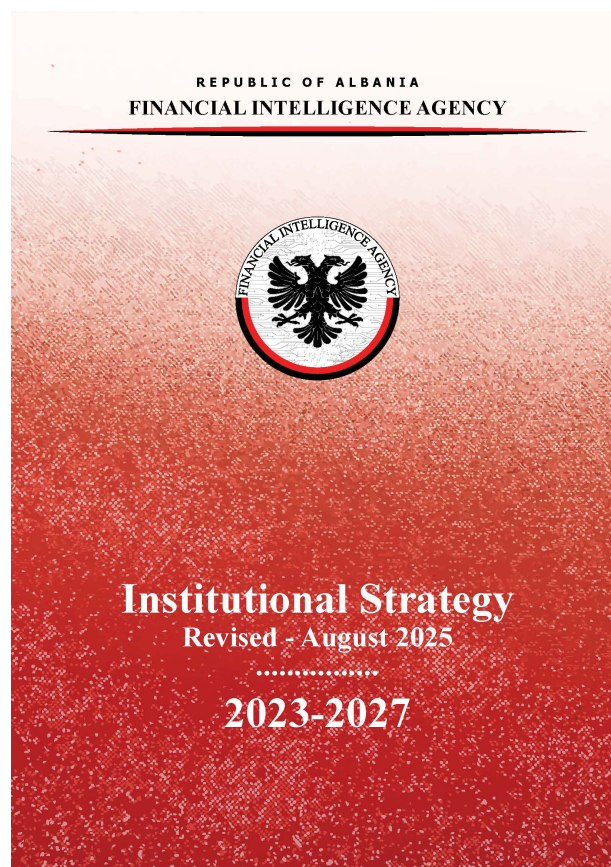
On 21 May, the FIA in cooperation with the European Movement in Albania (EMA) and with the CHCIT, held a roundtable discussion on the “Strategy for educating the public on the risk that money laundering and the financing of terrorism pose in our society 2025–2027”, focusing on the role that should be played not only by state institutions, but also by civil society, education establishments, the media and the private sector. On 30 October, the FIA in cooperation with EMA organised another meeting within the framework of the National Convention for European Integration on the topic “Financial education Chapter 24 – Within the framework of the ‘Strategy for Educating the Public on the risk posed by ML/FT’. FinTech, Innovations and Risks in the Fight Against Money Laundering”.

The meeting focused on the challenges and opportunities that financial technology offers in the prevention of money laundering, terrorist financing and the financing of the proliferation of weapons of mass destruction, as well as in addressing issues related to disinformation, a problem with a direct impact on the country's economy and national security.

Institutional Strategy of the Financial Intelligence Agency 2023–2027

In December 2022 FIA approved the “Institutional Strategy” 2023 - 2027, revised in September 2025, with a focus on strengthening analytical and operational capacities, the effective implementation of the legal and regulatory framework, increasing interinstitutional and international cooperation, raising the awareness of reporting entities, as well as the development of institutional capacities and human resources.

During 2025, based on the ongoing monitoring of the Action Plan of this strategy, 63 action items out of a total of 70 measures were implemented. Outstanding measures include the provision of new licenses for analytical programs, the increase of the awareness of entities of the FINTECH sector, digitalisation and procedures of the implementation of administrative measures, as well as the continuous review and adaptation of the internal operational manuals.



FIA will continue the unabated implementation of the institutional strategy during 2026.

Inter-institutional cooperation

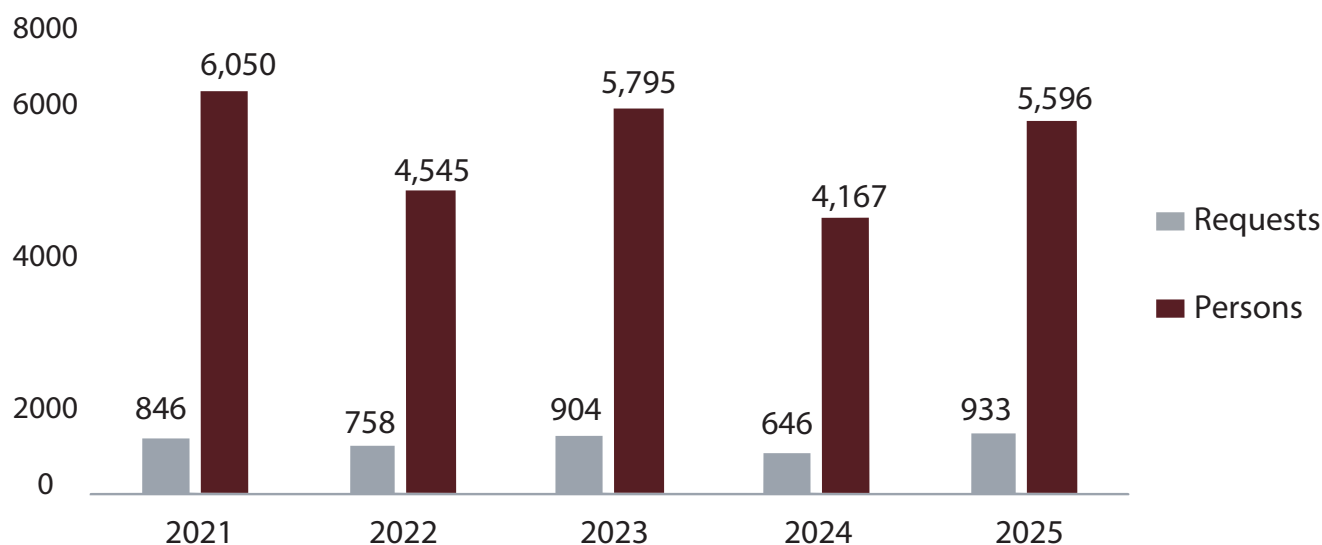
Within the framework of inter-institutional cooperation, the FIA exchanges information and has continuous and intensive correspondence on issues of laundering the proceeds of criminal offence, criminal offences or criminal activities that generate proceeds of crime or financing of terrorism with the institutions of the criminal justice system and other competent law enforcement or intelligence authorities.

During 2025, FIA processed a total of 933 inquiries received from the State Police, the Prosecutor's Offices, SPAK, etc., whereby information was requested for 5,596 persons and entities. Relevant detailed data are reflected in the following table:

Table 15: Number of requests sent by the State Police and the Prosecutor's Offices for 2025.

Institution	No. of requests	No. of persons
State Police	377	1,666
Prosecutions	492	3,334
SPACOC	57	524
NBI	7	72
TOTAL	933	5,596

Graph No. 5: The number of requests for checks and the number of persons involved over the year



Additionally an important part of the FIA's activity continues to be the exchange of information with other institutions, within the framework of assessment processes or licensing procedures from authorities such as: the Police Oversight Agency (POA), High Judicial Council (HJC), High Prosecutorial Council (HPC), BoA, National Authority for Classified Information Security (NACIS), the National Cannabis Control Agency (NACC), Defense Intelligence and Security Agency (DISA) etc. FIA, has demonstrated the outmost commitment in order to respond within the legal deadlines.

FIA has also responded to the "fit and proper" requests submitted by the Ministry of Europe and Foreign Affairs and the Ministry of Justice, regarding the reputation of the appointees of the diplomatic corps or applicants as real estate intermediaries. Detailed information regarding requests is presented in the table hereunder:

Table 16: Number of requests from other law enforcement bodies.

Institution	No. of requests	No. of persons
Ministries	95	866
BoA	88	201
HJC	5	68
HPC	45	57
NACIS	9	12
NACC	8	16
POA	50	196
DISA	14	27
GDT	3	11
SIS	16	46
Special Commission*	23	33
Advocates/Legal firms	2	3
Total	358	1,536

*Special Commission for the Verification of Property and Background (GDSP)

INTERNATIONAL COOPERATION

Exchange of information with FIUs

During this year, compared with 2024, there has been an increase of around 15 % in the requests sent by FIA, as well as a significant increase of 24% in the requests that FIA has received from partner FIUs.

Table 17: Number of requests and responses with partner FIUs over the years.

Year	Sent by FIA	Received from partner FIUs
2021	82	107
2022	101	108
2023	92	85
2024	113	93
2025	130	115

Council of Europe Moneyval Committee

On 12-13 June 2025, FIA participated in the 69th plenary meeting of the Moneyval Committee, which was held in Strasbourg, where Reports of Member Countries in the Assessment process and the latest developments in the framework of the implementation of FATF standards were discussed.

FIA also participated on 15–18 December 2025, in the 70th plenary meeting of Moneyval, in which key issues related to the assessment and strengthening of anti-money laundering and counter-terrorist financing systems, the review and discussion of the draft mutual evaluation report of the 6th round of countries under evaluation, as well as updates on international developments and initiatives within the framework of FATF standards, were discussed.

The plenary addressed also the adoption of the rules of procedure for the 6th round of evaluations, the preparation of a protocol for the Council of Europe Convention on money laundering and the recovery of criminal assets, as well as developments within the framework of AML/CFT initiatives in other international organisations.

During this plenary meeting, the elections were also held for the Chair, the Vice-Chairs and the members of the Moneyval Bureau, and issues related to the process of mutual evaluations, the training of evaluators, money laundering typologies and organisational aspects were addressed.

Training by the Moneyval Committee

On 11–12 March 2025, a two-day training was conducted by two representatives of the Secretariat of the Moneyval Committee, within the framework of the 6th round of Albania's evaluation. This training, was attended by 120 participants, members of the ITWG, representatives of public institutions, including law enforcement and supervisory institutions, as well as representatives of the private sector.

The participants in this training were acquainted with the procedures and deadlines for the assessment of the 6th round, as well as the main changes to the FATF standards and methodology (anti-money laundering standards that serve as a basis for the assessment of states at the international level) and took part in simulated sessions regarding criminal proceedings for ML/TF, the seizure and confiscation of criminal assets, the supervision,

and control of possible criminal links of non-financial free professions, as well as the mechanisms for supervising the implementation of financial sanctions on persons and entities declared as financiers of terrorism.

In this activity, representatives of FIA, NBC, BoA and FSA gave presentations according to the respective sectors, regarding risk assessment, transparency of beneficial owners' data, supervision of financial institutions and providers of virtual asset services. At the conclusion of the sessions, valuable comments and suggestions were given for further reporting during the assessment process, as well as for the necessary improving interventions in the preventive AML/CFT/PF system.

Egmont Group

On 6 - 11 July 2025, FIA participated in the 31st Plenary meeting of the Egmont Group, organised by the FIU of Luxembourg. This meeting offered an opportunity to strengthen existing partnerships, to build new collaborations and to contribute to initiatives that improve global efforts against financial crime. The representatives of the FIA held important discussions in various working groups and regional forums.

Regional Meeting of the FIU

FIA participated in the Regional Meeting of FIUs, which was held on 20 November 2025, in Skopje, North Macedonia.

During the meeting, the strengthening of regional cooperation and cooperation with the European Union in the field of the fight against ML/TF was discussed, including cooperation with the FIU.net platform and developments related to the establishment of the new European Anti-Money Laundering Authority (AMLA).

In this meeting, the signing ceremony of the Memoranda of Understanding was also held, within the framework of the Regional Expert Exchange Program of the FIU. The developments and preparations related to the 6th Round of Moneyval Evaluations, for AML/CFT systems, were also addressed at the meeting.

The FIA participated in the Europe II regional meeting of the Egmont Group, which was held on 3 –5 December 2025, in Prishtina. Representatives of FIUs from the countries of the region participated in this meeting, holding discussions about strengthening of international and regional cooperation in the fight against ML/TF. During the working sessions, issues related to the exchange of information between FIUs, the latest developments within the framework of international AML/CFT standards, and preparations for international assessment processes were also addressed.

Furthermore the meeting, served as a platform for the exchange of experiences and best practices among the participating countries, with the aim of increasing the effectiveness of operational cooperation and coordination at the regional level.

Coordinating meeting with international partners

On 18 June 2025, FIA organised a coordinating meeting with international partners on the Action Plans of the “National Strategy for the Prevention of Money Laundering and Terrorist Financing 2024-2030” and the “National Risk Assessment” with the aim of coordinating assistance and support for the implementation of the measures of these strategic documents.

Representatives from the Delegation of the European Union in Albania, the Council of Europe, the Embassy of the United States of America, the British Embassy, the Swiss Embassy, the Italian Embassy, the German Embassy, the French Embassy, GIZ, the EU4LEA2 Project, the Financial Services Volunteer Corps, as well as the European Movement in Albania participated in the meeting. FIA emphasized the essential role, in cooperation with international partners, for improving capacities and increasing institutional sustainability.

During the meeting, information on the outcomes of the measures carried out for the strategic documents and the Action Plan of the national ML/FT risk assessment by public institutions and the private sector were presented. The international partners appreciated the commitment, transparency and effectiveness of the process so far, reaffirming their readiness to continue their support for FIA.

LEGAL AMENDMENTS

Pursuant to the legal amendments to Law No. 9917, dated 19.05.2008, “On the prevention of money laundering and financing of terrorism”, during 2025 FIA has prepared the draft decision “On the form, manner and procedure for reporting the data of the State Cadastre Agency”, which has been consulted with the relevant institution.

The following bylaws have been adopted during 2025:

- Guideline of the Minister of Finance no.1 dated 21.01.2025 “On the methods and procedures for implementation by entities involved in financial activities”;
- Guideline of the Minister of Finance no. 3 dated 24.01.2025 “On the methods and procedures for implementation by designated non-financial businesses and professions”.
- Decision of the Council of Ministers no.665, dated 12.11.2025, “On determining the supervisory authorities”;
- Decision of the Council of Ministers no.668, dated 12.11.2025, “On the form, manner and procedure for reporting data by the licensing and supervisory authorities”;
- Instruction of the Minister of Finance no.25, dated 11.11.2025 “On the methods and procedures for reporting by the customs authorities”.

FIA has provided legal opinions and has contributed to the inter-institutional consultation process for a number of draft laws and bylaws.

These have included initiatives in various areas, such as: national strategies for the protection of the financial interests of the European Union, the screening of foreign direct investments, the regulation and supervision of financial activity (including currency exchange offices and the automatic exchange of financial information), as well as draft laws related to the functioning of the financial system and the business activities.

In addition, FIA has provided an opinion on a series of draft laws related to the legal framework of commercial and business activity, including amendments to the legislation on commercial companies, the registration of businesses and non-profit organisations, the functioning of the National Business Center, as well as other legal initiatives of importance for transparency, interinstitutional cooperation, and the strengthening of the regulatory framework.

BUDGET, HUMAN RESOURCES AND IT

The budget and its management

During 2025, FIA has spent a total of 174.4 million Lek, or 24% more compared to 2024. Factual expenditures amounted to 90% of the funds allocated for 2025. The expenditures were divided into current expenditures of 170.3 million lek and 4.1 million Lek in capital expenditures. The ratio of current and capital expenditures to the total was respectively 97.6% and 2.4%, approximately at the same levels as in 2024. Factual current expenditures were 95% of the planned budget while capital expenditures amounted to 28% of the planned budget. Investment funds were used to meet the needs for creating working conditions for the employees according to standards.

FIA will continue to be engaged in the active management its budgetary resources, transparency, and the improvement of the planning process, aiming to increase efficiency and effectiveness in the use of allocated public funds, for the enhancement of professional capacities and the further development of IT infrastructure, enabling the implementation and achievement of institutional objectives, for the prevention of ML/TF/PF.

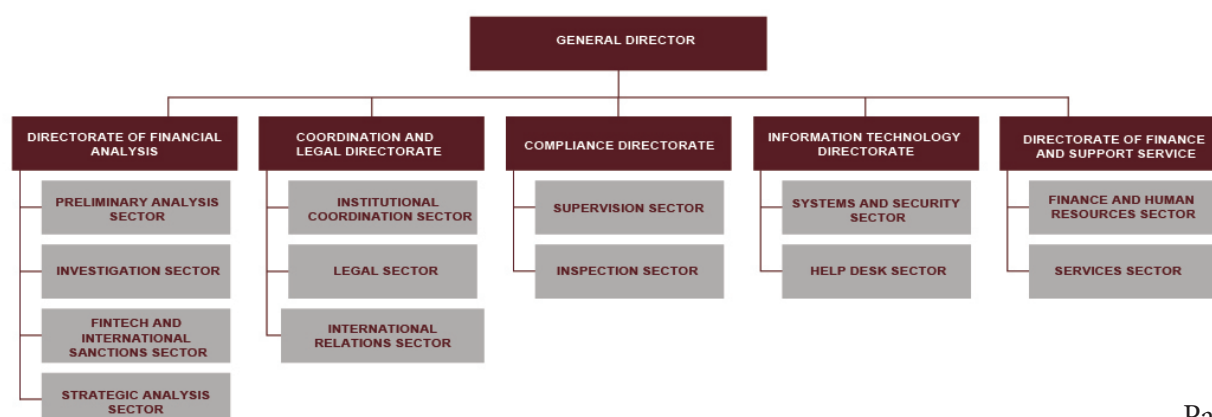
Human resources management

The organisational structure of the FIA was approved by Prime Minister's Order no. 45 dated 19.03.2024 "On the Approval of the Structure and Organization of the Financial Intelligence Agency". In 2025 FIA has continued the implementation of this order thorough recruitment procedures and its effective fulfilment. As part of the priority objectives, particular importance was given to increasing the professional capacities of employees and acquiring new knowledge regarding the prevention of ML/TF/PF, through the organisation of various training activities, financed by the FIA budget, donors, as well as international bodies with which the FIA cooperates.

During 2025, 38 FIA employees participated in 52 training activities addressing topics related to: Investigation of virtual currencies; FATF international standards; Financial investigation; Disrupting international professional money laundering networks; Anti-corruption and asset recovery; Standards, functions, and risk-based supervision for ML/TF/PF; The use of virtual tools for the financing of terrorism; Money laundering and asset recovery; Analytical methods and techniques for the investigation of ML/TF; Information and awareness on financial technology (Fintech), Innovations and the Risks they bring in the framework of the fight against money laundering, etc.

Within the framework of the recommendations of international bodies for achieving the objectives in the fight against ML/TF/ADM, FIA will continue to pursue priority policies for improving professional capacities, based not only on increasing the number of the organisational structure but also on the professional development of employees through the provision of opportunities and involvement in trainings.

FIA's Organizational Chart:



INFORMATION TECHNOLOGY

During 2025, the Directorate of Information Technology (DIT) has ensured the stable functioning of the information systems and has directly supported FIA's analytical and operational processes. The main activities include:

- Administration and maintenance of the electronic reporting system (SAR, CTR);
- Maintenance of the infrastructure of servers, databases, Domain Controller and Exchange Server;
- Upgrade of firmware and operating systems for network devices (firewall, switch, FMC, FTD);
- Monitoring and protection of the computer network;
- Management of backup copies and data security;
- Maintenance of electronic mail platforms;
- Updating and administration of the official website of FIA;
- Publication of FATF documents, ML/TF typologies and the Transparency Program;
- Technical support for the drafting and publication of the 2024 Annual Report.

INTERINSTITUTIONAL COMMITMENTS

DTI has consolidated and administered the electronic exchange of information with:

- GDSP (TIMS, FER, SIENA);
- DPGJC (Civil Status Register);
- GDT (C@TS, Central Register of Bank Accounts, Fiscalization);
- GDC(Import/Export, Declarations);
- National Chamber of Notaries (NISA);
- NBC (Business Register);
- High Inspectorate of Declaration and Audit of Assets and Conflicts of Interest (PEP Lists);
- SCA (Cadastral Register);
- Ministry of Justice (Judicial Status Register);
- Egmont Secure Web (ESW);
- NACS and National Agency for Information Society for security and infrastructure matters.

In 2025, DTI has taken an active part in training and projects with EU4FOCAL, GIZ and international partners. DTI has also taken part in Training and Webinars that were organised by the NACS, which aimed to increase technical capacities in the Management of Cyber Incidents and Crisis, and also to increase technical capacities in the use of alternative technologies with Open Source platforms.

The most important achievements during the year 2025 consist of:

Strengthening cybersecurity

- Implementation of the Web Application Firewall (FortiWeb);
- Implementation of the SIEM system (Elastic);
- Renewal of Cisco licenses and upgrade of network equipment;
- Consolidation of Bitdefender GravityZone;
- Update of the Domain Controller;
- Fulfilment of NACS recommendations after the risk assessment.

Operational stability

- Ensuring the uninterrupted functioning of the online reporting system;
- Secure administration of the transfer of reports from the DMZ to the secret zone;
- Consolidation of communication through Egmont Secure Web;
- Ongoing technical support for reporting entities.

Digitalisation and transparency

- Updating the new official website;
- Periodic publication of strategic and legal documents;
- Updating of the Transparency Program.

Capacity building

- Professional training of FIA personnel;
- Participation in specialised training of NACS;
- Increase of technical capacities regarding SIEM, WAF, IDS/IPS, EDR.

OBJECTIVES FOR THE YEAR 2026

FIA's objectives for 2026 are presented hereunder.

- Inter-institutional coordination of the process of the 6th round of the country's AML/CFT evaluation by the Moneyval committee;
- Direction of the Interinstitutional Technical Working Group;
- Coordination and monitoring of the “National Strategy for the Prevention of Money Laundering and Terrorist Financing 2024-2030” and the action plan;
- Coordination and follow-up of the action plan for mitigating the risks identified in the National Risk Assessment for ML/TF;
- Coordination and monitoring of the “Strategy for public education on the risk posed by money laundering and the financing of terrorism in our society”;
- Harmonization of the legal framework with EU directives and regulations;
- Improvement of the operational efficiency of law enforcement bodies and other agencies in the fight against ML/TF;
- Development of the technological capacities of FIA;
- Strengthening cooperation at national and international level;
- Implementation of the integrated training plan through increasing institutional capacities;
- Implementation of the oversight ML/FT risk based capacities, in cooperation with the supervisory authorities;
- Increase of interinstitutional coordination and cooperation for the effectiveness of the preventive system and the efficient handling of cases disseminated by FIA to law enforcement officials;
- Familiarisation with FATF international best practices and their implementation regarding compliance of reporting entities;
- Active participation in international projects (CoE, EU, GIZ, U.S. Department of State, etc.);
- Training of the reporting entities by focusing on the amendments to Law 9917, the bylaws, the assessment of ML/TF risk and the effective implementation of international sanctions;

ANNEX I

TYPOLOGIES OF CASES DISSEMINATED TO LAW ENFORCEMENT AUTHORITIES

Typology 1

The use of personal accounts for unregistered commercial activity, accompanied by frequent cash deposits.

Albanian citizen A has opened accounts in bank Z and during the period 2024–2025, deposits of approximately 300,000 EUR have been made in his accounts from citizen A, as well as from several other individuals. Verifications in the civil status register, indicated family relations among some of these individuals (such as sisters, brothers and cousins).

Subsequently, other checks were carried out with second-level banks for the bank accounts of all citizens involved in this activity. From these checks it resulted that during the same period of time, a total of about 1,900,000 EUR was deposited.

According to the administered data, the scheme has functioned as follows:

- Citizen A, together with 9 other citizens, have been provided with prepaid cards, which have been used for the purchase of luxury brand products, in different states.
- These citizens made deposits into their personal accounts or into each other's accounts, while later a considerable part of the funds was transferred to Mastercard-type cards.
- From the analysis of the use of these funds, it appears that they have been used mainly for carrying out online purchases.
- In addition to deposits, the bank accounts have also been credited with a considerable amount, around 350,000 EUR, as VAT refunds through the companies “Planet Tax Free” and “Global Blue Tax Free”. These funds too have been used to carry out purchases of products of different brands.

The checks carried out at the NCB and the tax system, indicated that citizen A registered in 2024 the entity X, with the object of activity 'online clothing sales'.

According to the declared data, for the year 2024 the entity did not report any income, while at the beginning of 2025 the activity was deregistered. Moreover, verifications for the other citizens involved, revealed only data on their employment status.

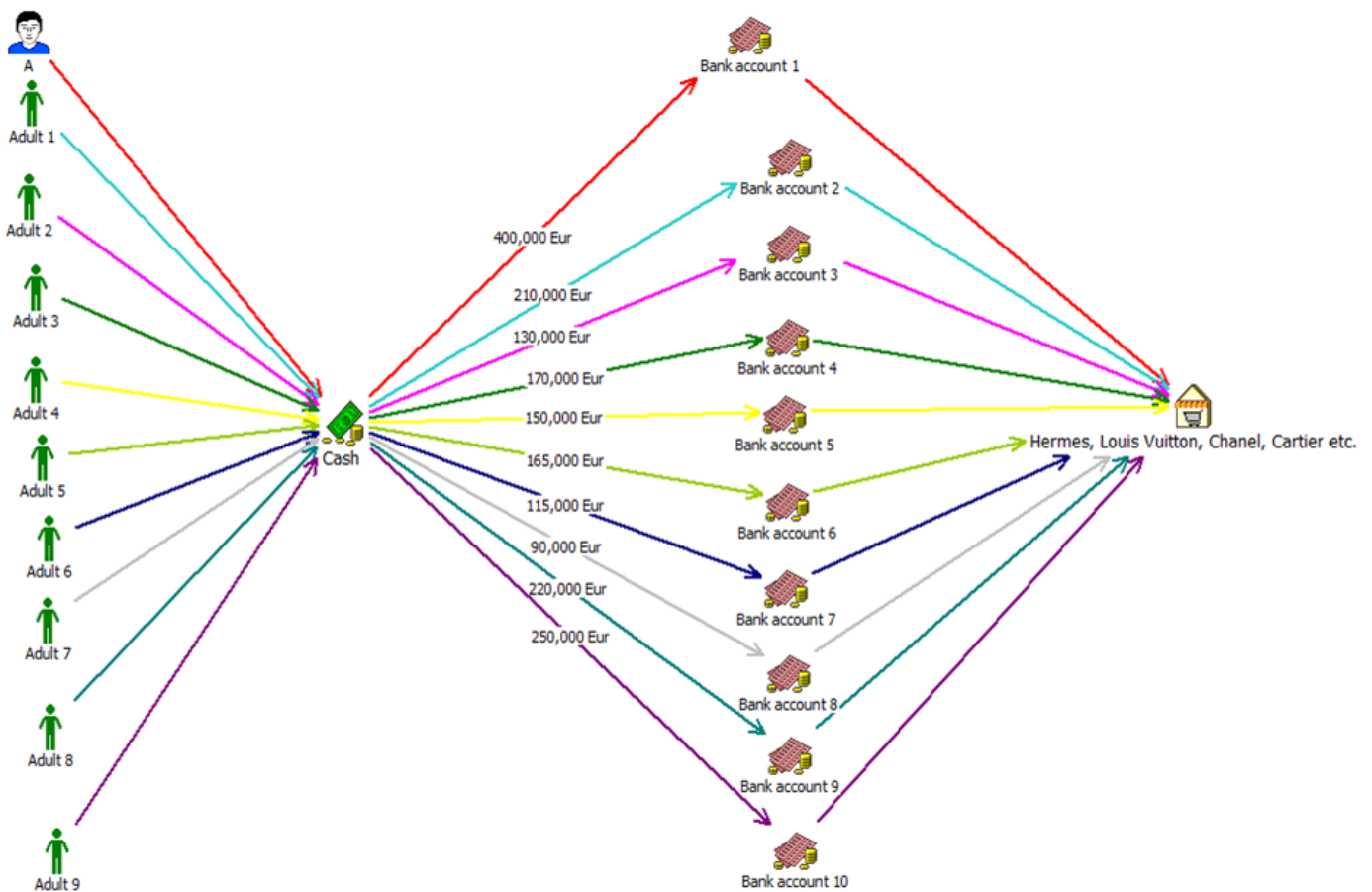
From these verifications it was evidenced that some of them had been employed in the same companies, unrelated to the activity above.

Based on the suspicions created by the analysis of the data, specifically:

- The circulation of considerable amounts through the banking system, which are found to be linked to the conduct of an unregistered online trading activity;
- Obtaining the refund of VAT, while it does not appear that VAT has been paid for the import of goods into Albania;
- The lack of individually declared income by the citizens involved, which could have justified the deposits.

The information was disseminated for further investigation to law enforcement agencies

Scheme 1



Typology 2

Investments in immovable property with unknown or unjustified sources of funds

Citizen A, over the years 2021–2025, appears to be involved in a series of notarial acts through which he has acquired immovable property in different areas of Tirana and Kavaja. Initially, in 2021, he invested in the city of Kavaja where within a period of 3 months he bought for 260,000 EUR a plot of land (7,500 m²) and benefited through donation another plot of land (1500 m²). Furthermore, in 2022 he did purchase another plot of land (8400 m²) at 520 Lekë/m². Whereas during the years 2023 – 2025 he carried out the highest number of investments, in the Dajti area in Tirana, where through contracts for the sale and purchase of immovable property he benefited 56,000 m² ‘arable land’ at a price per m² that ranged from 4 – 21 EUR.

Subsequently, in addition to the above anomaly related to the acquisition of property at prices lower than the market level, cases have also been identified where these properties were resold within a short period of time at significantly higher values.

- Specifically, in March 2022, citizen A, sold to citizen B a piece of immovable property of the type 'arable land' with an area of 6,200 m² for the value of 423,000 EUR, while verifications show that only a few months earlier he had bought it from another citizen for the value of 30,000 EUR.
- But on the same date another similar transaction was also carried out, where citizen A sold to citizen B an immovable property of the type ‘arable land’ with an area of 1,850 m² for the value of 180,000 EUR, which only a few months earlier he had bought for only 15,000 EUR.

Additionally, in the same area where citizen A had acquired the greater part of the properties at relatively low prices (4–21 EUR/m²), it appears that transactions have also been carried out with the company ‘X’, from which citizen A had bought immovable property of the type 'arable land' at a noticeably higher price, around 75 EUR/m².”

In addition to the numerous investments made in the capacity of the individual, the verifications made indicated that citizen A also registered in 2022 the company ‘Beta’, with the object of activity in the field of construction and excavation, through which he had benefited considerable areas of immovable property in the areas of Petrela and Mullet, specifically around 52,000 m² in Petrela and 16,000 m² in Mullet.

From the analysis of the purchase acts, the same anomaly has been found in the manner of acquisition of these properties, transactions with excessively low prices per m².

The analysis of the financial statements, sales and purchase books, indicated that this company, although newly established, has shown considerable financial activity as early as the second year of operation.

According to the declared data, ‘Beta’:

- It has reported profits reaching up to around 1,700,000 EUR, where the greater part of them has been transferred to reserves, while the dividend payouts has been relatively low, around 70,000 EUR.
- From the first year of activity, a considerable number of heavy machines were registered in its ownership, an element which raises suspicions regarding the source of financing or the manner of their acquisition.

From the verifications carried out on the source of the income used for carrying out the investments, it results that citizen A has used as a source of financing funds obtained from the sale of immovable properties in the amount of EUR 423,000 and EUR 180,000.

In addition to these, transfers of funds from the account of company 'X' have also been identified as intermediary payments in the negotiation with the owner of the land plot, as well as transfers from the account of his company 'Beta'.

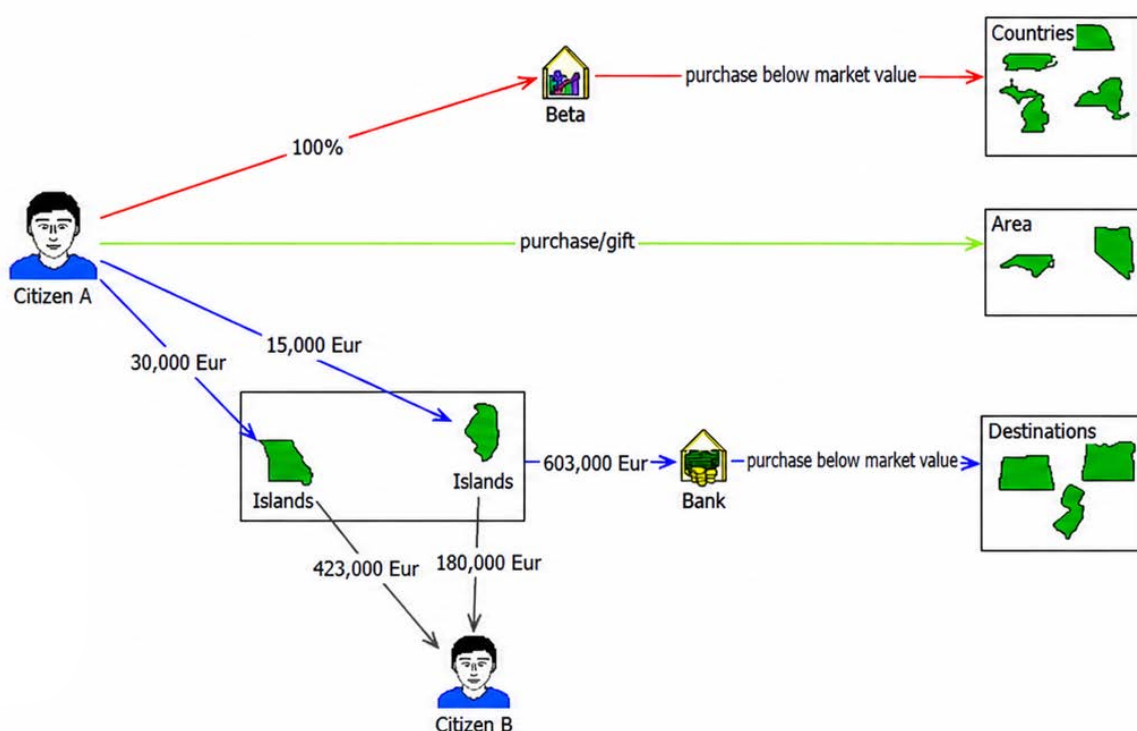
The accounts of company 'Beta' were credited through multiple transactions for the settlement of invoices and loan disbursements. These funds have been used partly for the activity of the company and partly for the settlement of contracts for the sale and purchase of immovable property.

Verifications conducted in SCA, revealed a high number of immovable properties in the ownership of citizen A and the company 'Beta' a high number of immovable properties results.

Taking into consideration:

- The high number of transactions with immovable property, the majority of which had been purchased at a price significantly lower than the market price raises suspicions about the real source of the payments for their purchase;
- Two of the properties were purchased at an excessively low price and were resold within a short period of time at a value several times higher;
- Investments in real estate began in 2021 continuing further in 2022 -2023, while the business activity began growing in 2023;
- The rapid growth of business activity, accompanied by a high volume of purchase and sale transactions, as well as significant investments in machinery and equipment,

the case was disseminated for further investigation to law enforcement authorities.



Typology 3

Suspicious investments in real estate and works of art from international sources of funds and companies registered in jurisdictions with tax advantages.

Citizens A and B, with Albanian citizenship and foreign nationality, carried out during 2025 purchases of immovable property and works of art in the territory of the Republic of Albania, in high values, using funds originating from jurisdictions and businesses registered in jurisdictions with tax advantages, which increase the complexity and suspicions regarding the origin of the funds.

Specifically in February 2025, citizen A (18 years old), purchased a villa on the coastal area worth 1.5 million EUR. According to the data administered, the financing for the purchase was provided by her sister, citizen B.

Citizen B, a 40 years old resident in a country X known for its tax advantages, has supported this investment through funds received from her bank account in a South African state 'AF1', considered to be at increased risk in relation to corruption and the informal economy.

Furthermore during 2025, citizen B purchased a villa on the coast with a value of 1.7 million EUR, financed from a personal account in a country Z, also known for its tax advantages.

Additionally, during the first half of 2025, citizen B appears to have invested in Albania also in the purchase of works of art worth approximately 700,000 EUR.

According to the data available, citizen B is the sole partner of a business 'B1', which operates in the online gaming sector in the Seychelles (where the latter is a partner of a company registered in state 'Z', company 'B2', with the same field of activity).

The income obtained from the the dividend payouts had been transferred to the account of citizen B, in the country of residence 'X', in the amount of several million EUR, part of which has been used for these investments.

Considering that the transfers were not carried out from the place where the residence or business activity is located, FIA cooperated with partner FIUs, where we have been informed that:

- The activity of company 'B2', in country 'Z' has been deregistered since 2023;
- Citizen C, the spouse of citizen B, was involved in illegal activities related to organised crime.

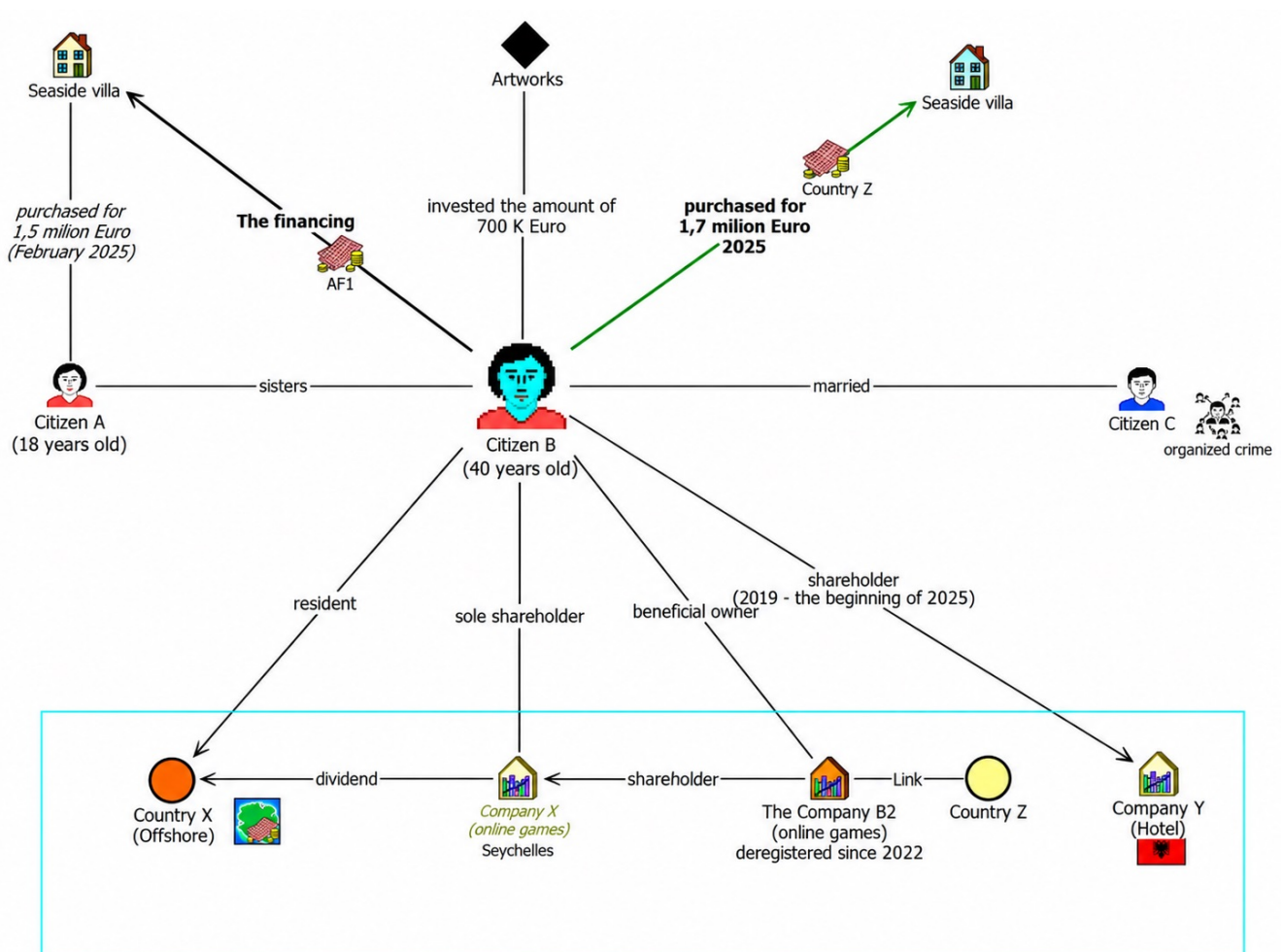
In addition, this individual together with several others from her country of origin, registered company Y in 2019, with activity in the hospitality sector, and at the beginning of 2025, she sold her stake for a high profit.

In conclusion of the case, taking into consideration the following elements:

- The use of international funds for the purchase of immovable property and pricey works of art;
- The source of the funds, secured from business activities with increased risk;

- Suspicions regarding the use of companies registered in countries with tax advantages to conceal the origin of funds;
- Family ties with individuals involved in known criminal activity,
- The involvement of several jurisdictions for the movement of funds (the country of residence, the country from which the transfers were ordered, the countries where the business operates), the case was disseminated for further investigation to the law enforcement authorities.

Scheme 3



Typology 4

Use of affiliated companies for the circulation of international funds in the online marketing sector

Eleven companies registered in Albania received transfers in the amount of 3,740,000 EUR, from different countries in Europe and Asia.

The further analysis of these companies revealed links between them, which consist in carrying out activity related to provision of online marketing services, as well as in the involvement of the same individuals in different roles, as administrators, partners or persons with the power of attorney.

Another common element identified was related to the time of carrying out the activity, as these entities were registered in 2024 and for a six-month period or within the same year were deregistered.

Taking into consideration the above elements, which create suspicions about the nature and purpose of the activity of these entities, the FIA has cooperated with the tax authorities.

Subsequently, we were informed by the tax authority that some of these companies have been referred to the law enforcement authorities for the criminal offences of concealment of income and non-payment of taxes and duties.

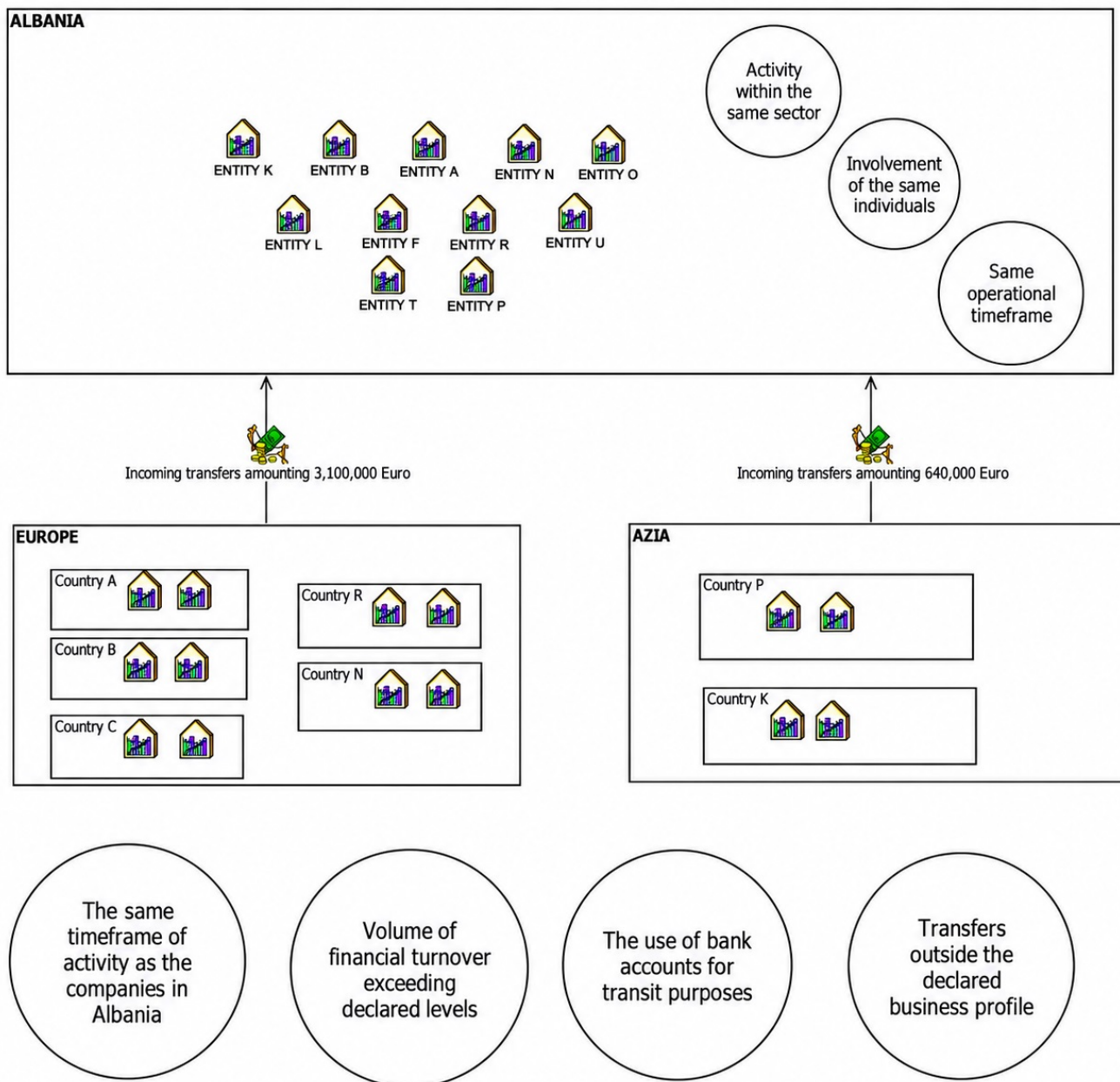
The analysis of the banking activity of the 11 companies, identified the countries from which originated the highest volume of funds transferred and subsequently communication was carried out with partner FIUs in 7 different countries.

From the information obtained from these countries, several anomalies related to the companies transferring funds emerged, specifically:

- Circulation of funds many times higher than the declaration;
- Use of the accounts of entities for transit purposes, the funds are transferred to different states immediately after being credited;
- Transfers outside the profile or scope of activity of the company and without supporting documentation;
- The companies have carried out activity during the same period as the companies registered in Albania and the majority of them have been deregistered;

the case was disseminated for further investigation to the law enforcement authorities.

Scheme 4



Typology 5

Purchase of immovable property by persons with a criminal record in the field of narcotics

Citizen A, made several deposits into his account in the total amount of 50,000 EUR with a source of income from savings and also received transfers from third parties in the form of a loan or gift in the total amount of 75,000 EUR.

Verifications carried out on the third parties, showed no family relationship with citizen A.

Furthermore, the analysis of the financial transactions indicated that citizen A transferred the amount of 120,000 EUR to the account of citizen B, in a European country for the purpose of purchasing a real estate property.

Additional checks, unveiled that citizen A had changed his name to conceal a criminal record in the field of narcotics.

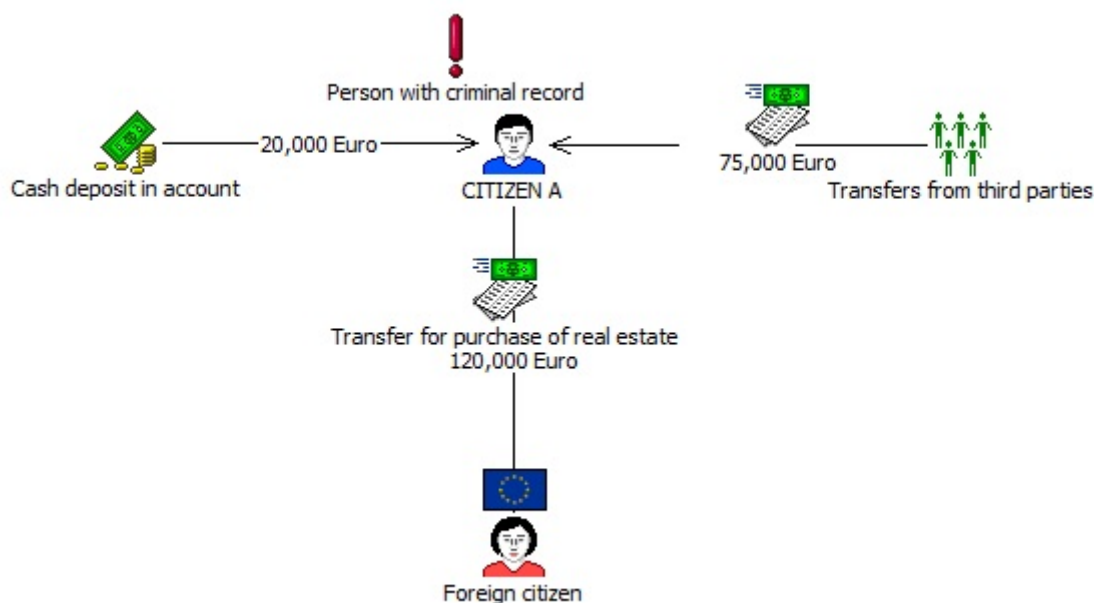
Taking into consideration the following anomalies:

- A loan/gift by third parties without documented links between them;
- Transfer of funds abroad for the purchase of immovable property,

the case was disseminated for further investigation to the law enforcement authorities.

Furthermore, we have been informed that the case has been referred to the Prosecution for the criminal offences of concealment of income and laundering of the proceeds of the criminal offence or criminal activity.

Scheme 5



Typology 6

Investment in immovable property by a former state official convicted of abuse of office.

Citizen A, a former employee in a state institution, convicted of corruption and abuse of office, signed during 2024 contracts for the purchase of the an apartment in the amount of 60,000 EUR, parking spaces in the amount of 35,000 EUR and a commercial unit in the amount of 60,000 EUR.

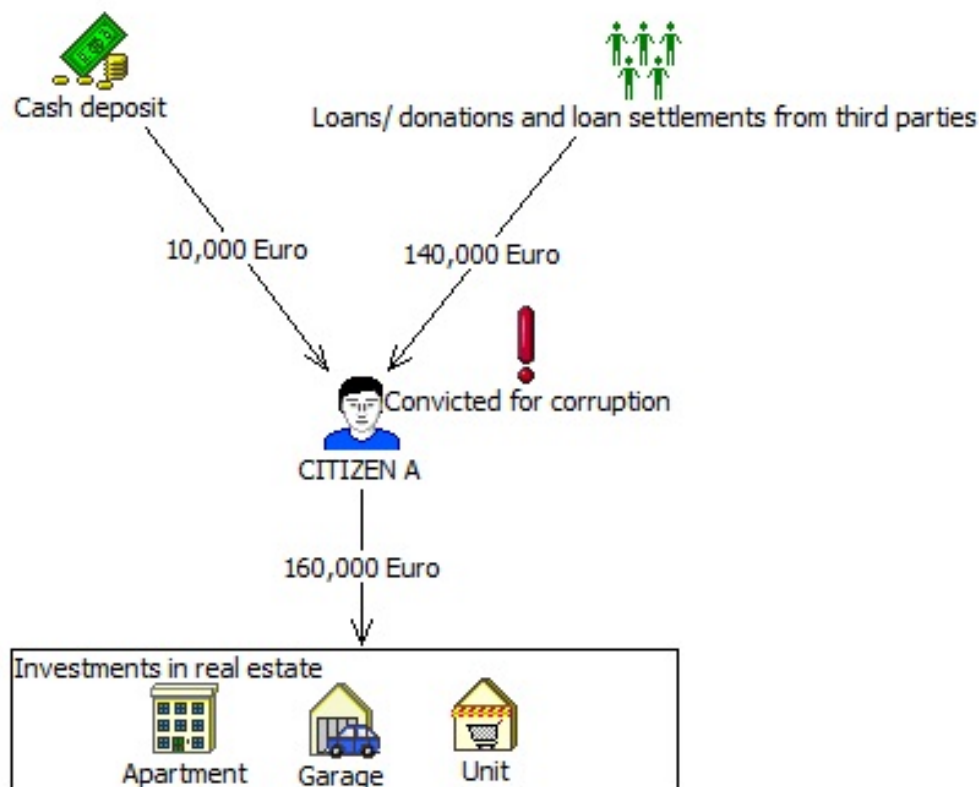
A's bank account data, indicated that the funds for the purchase of immovable properties were accumulated from deposits, transfers from third persons in the amount of 140,000 EUR, such as: donations, loans , debt settlement, etc., with unclear links between the parties.

Taking into consideration:

- The low purchase price of immovable property below market value;
- Structuring of incoming payments from different persons;
- Unclear links between the parties;
- Transfers to concentrated accounts for the purpose of acquiring real estate, as well as granting loans,

the case was disseminated for further investigation to the law enforcement authorities.

Scheme 6



Typology 7

Fraud scheme with Point of Sale (POS) transactions for financial gain

The Albanian Company X, established with the scope of activity: “Import export and wholesale and retail trade of various food and industrial goods”, with administrator foreign national A, on 06.12.2024 established a business relationship with one of the banks in Albania.

On 24 Decemer 2024, 2 POS were put into operation and tests were immediately carried out on both terminals with a foreign card issued by a bank in Belgium, with the cardholder being the Belgian citizen B.

On 26 December 2024 company X credited the account through POS, with the Belgian card in the amount of 96,000 EUR, the largest part of which, 83,000 EUR, it withdrew from the account.

On 31 December 2024 the account was credited again through POS, in the amount of 152,000 EUR and company X on the same date, attempted to credit again the amount of 790,000 EUR, but was unable to carry it out because the transactions were blocked by Mastercard International.

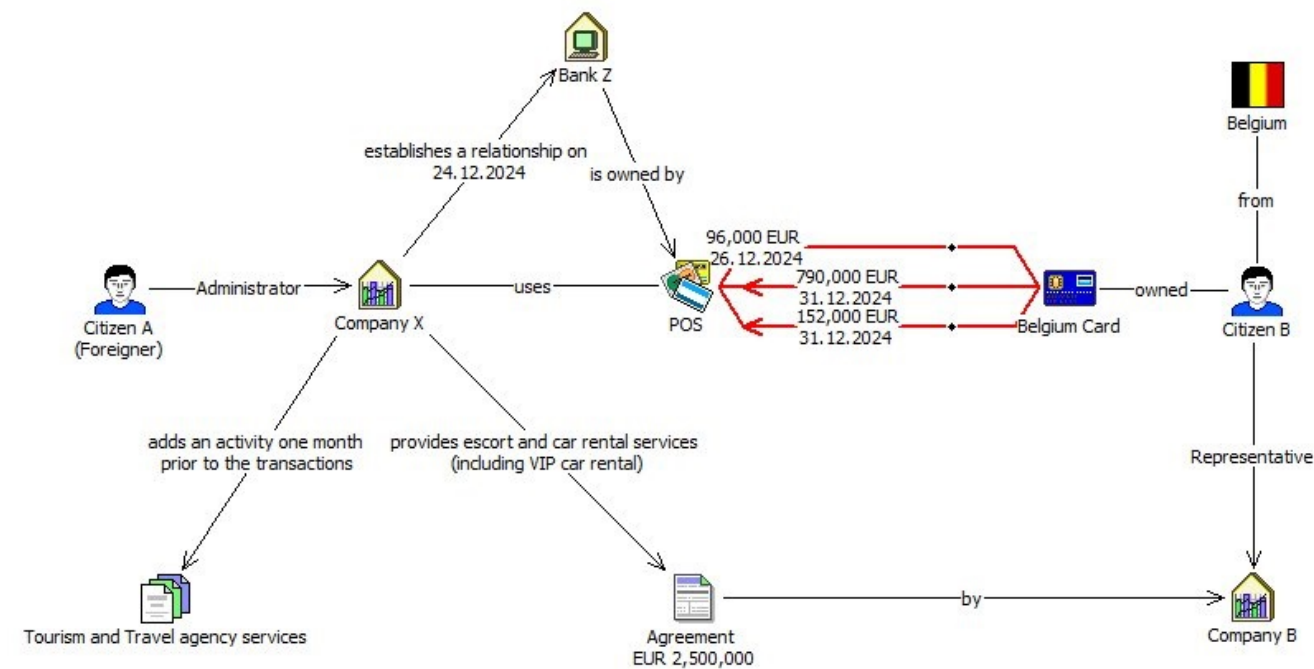
On 03 January 2025, the bank in Albania was notified by Mastercard, after the company had attempted to exceed the permitted limit on the card and suspicions had arisen regarding the card transactions, as a result the bank blocked the accounts of company X, and immediately initiated the “Charge back” procedure.

For the performance of transactions by POS (carried out and attempted), with a total value of around 1,000,000 EUR, company X has justified them through tax invoices, with values equal to the transfers, in favor of the entity Y, with an address in Belgium, on the basis of an agreement concluded on 01 September 2024, between company Y, with representative the Belgian citizen B, and company X, where it is stated that: company X will provide company Y with services such as: Escort; Rental cars; VIP rental cars, etc., and the total value of the services provided would amount to 2,500,000 EUR. Company X, one month before the transfers, has added as part of its activity also the service “Tourism, Travel Agency”.

Based on the above, taking into consideration the following elements:

- Incoming funds in the amount of 1,034,688 EUR beyond the limit allowed on the card, by exploiting a weakness in the prior Automation process and then transferring them to company X's account using the POS system and not bank transfers;
- Carrying out transactions in a short time and during the New Year holidays;
- The addition of the activity “Tourism, Travel Agency” to the scope of the activity of the Albanian company X, around one month before carrying out the transactions with the aim of justifying the transactions carried out,
- The provision of the claimed services of the Albanian company X to the Belgian company Y, did not correspond to the activity that company X, carried out over the years in Albania; suspicions did arise that the Albanian company X, with administrator foreign national A, in cooperation with company Y, with representative national B, had been involved in a fraud scheme, potentially also in violations of a fiscal/tax nature and the case was disseminated to the law enforcement authorities for further assessment.

Scheme 7





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