

**NATIONAL OFFICE FOR PREVENTION AND
CONTROL OF MONEY LAUNDERING**



ACTIVITY REPORT

2024



MINISTRY OF FINANCE
National Office for Prevention and Control of Money Laundering



NATIONAL OFFICE FOR PREVENTION AND CONTROL OF MONEY LAUNDERING

ACTIVITY REPORT 2024

**MANAGEMENT OF THE NATIONAL OFFICE FOR PREVENTION AND
CONTROL OF MONEY LAUNDERING**

PRESIDENT BOGDAN STAN

VICE-PRESIDENT CONSTANTIN-ILIE APRODU

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FOREWORD

Looking back to 2024 gives us the opportunity to highlight significant achievements and challenges for the whole team.

We intend to present in this report, in detail, the evolution of the activities carried out by the National Office for Prevention and Control of Money Laundering in 2024, the objectives achieved and the lessons learnt during this year.

We would also like to emphasise our continued commitment to excellence, innovation and social responsibility, values that guide us in every project and initiative dedicated to the fulfilment of our institutional objective, which is to ensure the integrity and security of the national financial system, an integral part of the European financial system, by preventing and combating money laundering and terrorist financing.

We would like to thank all those who have contributed to our achievements and those who have supported us, whether they are colleagues - representatives of other competent national authorities that have responsibilities in the field coordinated by the Office, foreign partners with similar functions in the field of preventing and combating money laundering and terrorist financing or representatives of the private sector - obliged entities, self-regulatory bodies of the liberal professions or representatives of the academia.

We start a new year with confidence, with clear goals for the future and we invite you to read this report as a testimony of our collective work and a constant manifestation of our firm commitment to prevent and combat money laundering and terrorist financing.

Thank you for your trust and interest in our work.

**National Office for Prevention and Control of Money Laundering-
FIU Romania**

MISSION AND OBJECTIVES



MISSION

❖ preventing and combating money laundering and terrorist financing in order to ensure the integrity of national, European and international financial systems.



VIEW

❖ Strengthening the National System for the Prevention and Control of Money Laundering, within which the NOPCML assumes the role of a strategic link between law enforcement authorities and private entities.



VALUES

❖ operational independence;
❖ moral integrity;
❖ efficiency;
❖ professionalism.

BASIC FUNCTIONS

- ❖ receiving, analysing and processing financial information;
- ❖ disseminating information to the competent authorities when, from the analysis of data and information processed at the level of the institution, there are indications of money laundering or terrorist financing or of the commission of crimes other than money laundering or terrorist financing;
- ❖ supervision and control of obliged entities, in accordance with the law, in order to prevent and combat money laundering and terrorist financing;
- ❖ coordinating the realisation of national money laundering and terrorist financing risk assessment;
- ❖ the fulfilment of the duties of competent authority in the field of the implementation of international sanctions, in accordance with the provisions of Government Emergency Ordinance No 202/2008 regarding the implementation of international sanctions, approved by Law 217/2009, with subsequent amendments and supplements;
- ❖ exchange of information with foreign institutions that have similar or similar functions, in order to prevent and combat money laundering and terrorist financing, in accordance with the legal provisions;
- ❖ Co-operation with the competent national and international authorities in order to carry out its specific activity in an operational manner.

INSTITUTIONAL OBJECTIVES

- ❖ promoting the institution's image at national and international level, emphasising its role as a strategic link between law enforcement authorities and private entities, a role that the NOPCML fulfils objectively;
- ❖ continue and intensify specific professional dialogue with all partners in the AML/CFT ecosystem, supervisory bodies, law enforcement authorities, self-regulatory bodies and obliged entities;
- ❖ the fulfilment of the commitments undertaken for 2025 in the Strategic Action Plan for mitigating the risks identified during the national assessment of money laundering and terrorist financing risks, as it was completed with the necessary measures to ensure the implementation of the recommendations contained in the Mutual Evaluation Report of Romania by the Moneyval Committee;
- ❖ elaboration and promotion of draft legislation necessary for the revision of the national legislation on preventing and combating money laundering and terrorist financing, with reference to the recommendations made by the Moneyval Committee in the Mutual Evaluation Report on Romania, adopted by the Moneyval Plenary Meeting in May 2023, the final provisions contained in the EU AML package, as well as the proposals made by national stakeholders, following an extensive consultation process.

EXECUTIVE SUMMARY 2024

22,470

SUSPICIOUS TRANSACTION REPORTS AND EX OFFICIO REFERRALS

In 2024, 22,470 suspicious transaction reports and ex officio referrals were registered with the Office.

1,126

SPONTANEOUS DISSEMINATION FROM OPERATIONAL ANALYSIS

The results of the financial analyses carried out in 2024 have been finalised by sending the information to:

- ❖ Public Prosecutor's Office of the High Court of Cassation and Justice - 182 reports, of which 179 cases were found to contain indications of money laundering crimes and were disseminated in accordance with Article 34(1) of the Law;
- ❖ Romanian Intelligence Service - 3 reports for cases in which suspicions of terrorist financing were reported to the Office and were disseminated in accordance with Article 34(2) of the Law;
- ❖ various divisions of the prosecution office - 122 cases, disseminated in accordance with Article 34(3) and 34(4) of the Law;
- ❖ various structures within the Ministry of Internal Affairs - 819 cases, disseminated in accordance with Article 34(3) and 34(4) of the Law;

4,305

OBLIGED ENTITIES

In 2024, a total of 4,305 obliged entities falling under the scope of Law 129/2019 Article(1) were supervised off-site, the areas of activity identified and assessed in the National Risk assessment as being exposed to money laundering, generally coming from high-risk geographical areas, namely Bucharest Municipality and the Counties of Brasov, Cluj, Prahova, Arad, Bihor, Iasi, Maramureş, Suceava, Timis, Dolj, Vaslui and Argeş.

320

VERIFICATION AND CONTROL ACTIONS

During 2024, 320 verification and control actions were carried out at the premises of the obliged entities.

44

TRAINING SESSIONS

In 2024, according to the annual training plan, the National Office for Prevention and Control of Money Laundering organised a total of 44 training sessions in the field of preventing and combating money laundering and terrorist financing, in online format, for all categories of obliged entities, training sessions attended by 9,354 representatives of obliged entities from all over the country.

196

EXTERNAL PARTNER REQUESTS

In 2024, FIU Romania received through its two secure communication channels, FIU.net and Egmont Secure Web - ESW, 196 requests for information, of which 23 were urgent and a total of 201 spontaneous information, of which 6 were urgent.

164

NATIONAL PARTNERS REQUESTS FOR INFORMATION

In 2024, 148 replies to the requests for information from the competent authorities at national level provided for in Law 129/2019 and 16 replies to the requests made under Ordinance No. 9/2021 were disseminated.

RECEIVING, ANALYSING, PROCESSING AND DISSEMINATING FINANCIAL INFORMATION

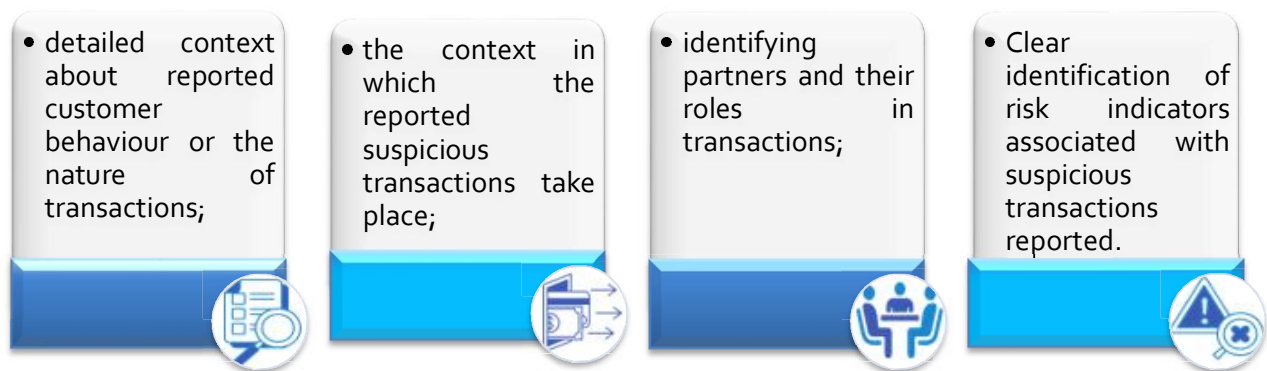
Receiving, analysing, processing and disseminating information

As a financial intelligence unit, the Office's core function is to receive, analyse, process and disseminate financial information.

In this respect, the Office acts as a *filter* positioned between the private sector, on the one hand, represented by the obliged entities in the financial and non-financial sector and the law enforcement authorities, on the other hand, with the role of receiving financial information and deciding, on the basis of its analysis and processing, to inform the law enforcement authorities or to keep the information in the Office's records.

As in previous years, the Office, through the Analysis and Information Processing Directorate, has intensified its efforts to increase the quality of the information transmitted to law enforcement authorities or other state institutions, which was also conditional on the receipt of high value financial information.

In this respect, it is worth mentioning the new reporting portal, which has introduced new reporting requirements, with the effect of receiving relevant information from obliged entities, such as:



In this way, new information was made available to the Office, which could be processed by the new software implemented, thus automatically establishing the risk level for each individual STR.

Moreover, the use of software for analysing the transactions carried out through new technologies facilitating FIAT fund transfers on various platforms has made it possible to track transactions, identify the persons involved in the transactions and graphically represent them, information that was not available before the implementation of the aforementioned tool.

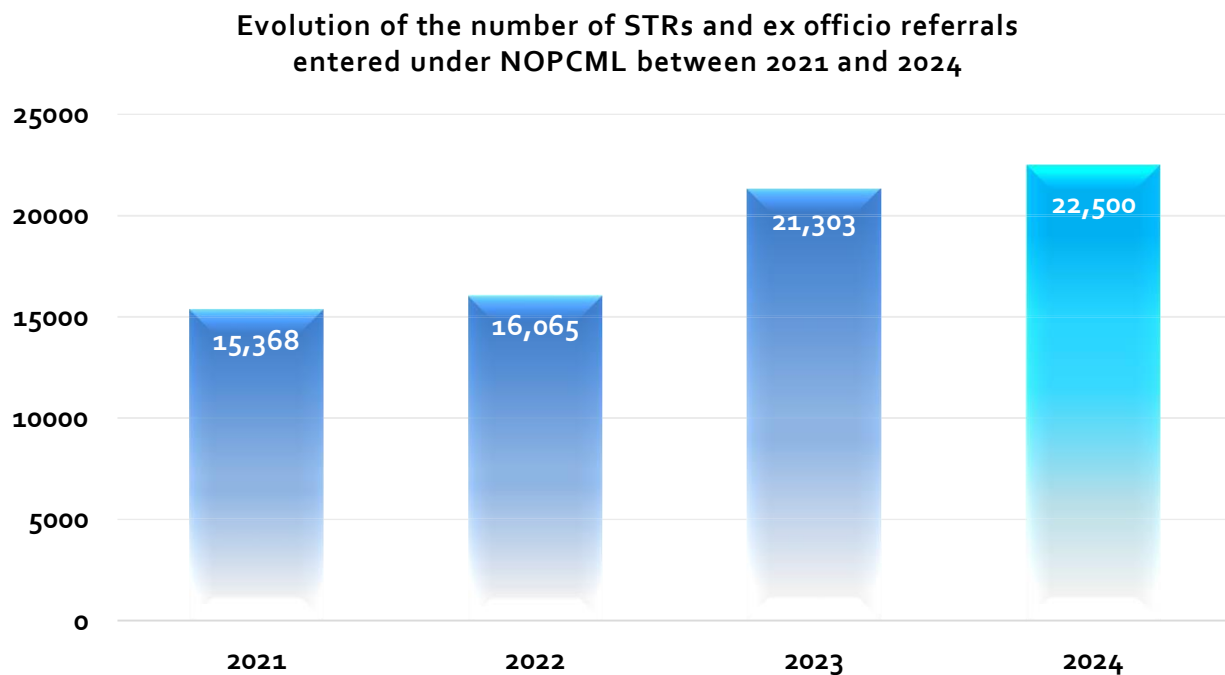
In conclusion, the Office has received new information, which has strengthened its crucial role in the Romanian system for preventing and combating money laundering and terrorist financing.

Assessing STRs in terms of risk of money laundering and terrorist financing

This stage of the analysis, which is carried out fully automatically, aims to identify the degree of risk of each individual STR and to distribute the alerts attached to the STR on prioritisation lists. In this way, an appropriate selection of STRs is made, by applying risk assessment criteria/indicators to capture and retain information on the amount of the sums involved in the transactions and information describing the nature of the transactions, which, by their existence in context, allow the identification of the degree of risk associated with money laundering and terrorist financing (ML/TF) associated with the information contained in an STR.

During 2024, 22,470 Suspicious Transaction Reports and ex officio referrals were submitted to the Office, an increase of 5.48% over the previous year.

The evolution of the number of Suspicious Transaction Reports and ex officio referrals for the last four years is as follows:



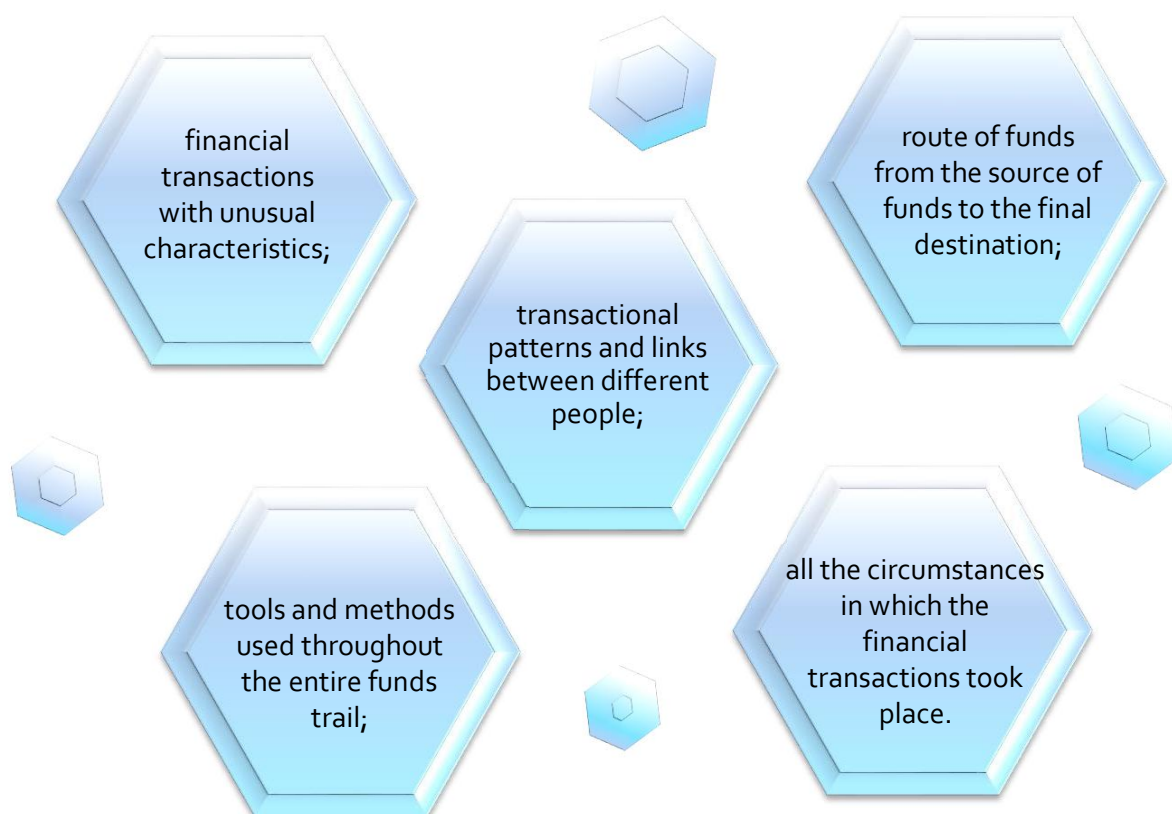
It can be seen that the interest of obliged entities in identifying suspicious money laundering transactions and activities has been on an upward trend over the last three years, so that in 2024 the number increased by **5.62%** compared to 2023 and **by 40.05%** compared to 2022. The maintenance of the upward trend in reporting suspicious transactions to the Office can be explained as a way in which the obliged entities have shown their awareness of the danger they may be subject to in case of penetration of their own business with funds of suspicious or uncertain nature.

Operational analysis

Operational analysis is the working and processing of financial, fiscal, property data or otherwise, in order to identify relevant information for the performance of the activity of preventing and combating money laundering and terrorist financing.

The process of operational analysis is carried out at the level of the Analysis and Information Processing Directorate for high-risk STRs, being structured on the classic components of the information cycle and consists in going through steps such as: collecting, evaluating, collating and analysing information in order to identify the existence of indications of money laundering or terrorist financing. In this way, disparate and heterogeneous information is identified and integrated, generating conclusions on the state of affairs under conditions of objectivity, neutrality and contextuality, with analysis being the mechanism by which the collected information is converted/transformed into information products that need to be disseminated, as appropriate.

Thus, the process of operational analysis aims to examine relevant information from multiple sources in order to quickly identify:



During this process, data and information received or requested by the Office from the financial and non-financial sector are analysed and correlated, and other information is accessed, on request or on the basis of direct access, to clarify the context in which the suspicious transactions took place, in order to establish conclusions that support the existence or non-existence of indications of money laundering, terrorist financing or other crimes.

Equally, the working method within the operational analysis process also took into account the conclusions of the MONEYVAL Fifth Round Mutual Evaluation Report of Romania, with specific objectives being pursued for the continued strengthening of the national system for preventing and combating money laundering and terrorist financing as a whole.

Suspend suspicious money laundering/terrorist financing operations

One of the key functions of the Office is the ability to order the suspension measure in relation to operations included in suspicious transaction reports submitted to the Office by the entities designated by law, prior to their realisation. The measure is of an administrative nature and may be ordered for a period of 48 hours, with the aim of preventing the loss of funds of suspicious origin by removing them from the financial system or transferring them to another account, in which case law enforcement efforts to identify, trace and freeze or seize the funds or assets concerned would be thwarted or made more difficult.

In this context, the institutional efforts directed towards increasing the degree of compliance of the obliged entities with the legal provisions on preventing and combating money laundering, has led, over time, to a gradual increase in the number of suspicious transaction reports received by the Office and in which the legal provisions governing its ability to order the suspension measure are applicable.

Thus, during 2024, the Office received 2,476 Suspicious Transaction Reports from the obliged entities prior to the execution of transactions, of which 891 contained transactions blocked at the level of the obliged entities, and for 1,585 reports a decision had to be issued by the Office. In this context, in 28 cases it was decided to suspend the transaction for a period of 48 hours, and in 6 cases the Public Prosecutor's Office of the High Court of Cassation and Justice decided to extend the suspension of the transaction for 72 hours, at the request of our institution.

The measures ordered by the Office are of an administrative nature and were taken in accordance with the provisions of Article 8 of Law 129/2019 on preventing and combating money laundering, as well as amending and supplementing certain regulatory acts, as amended and supplemented.

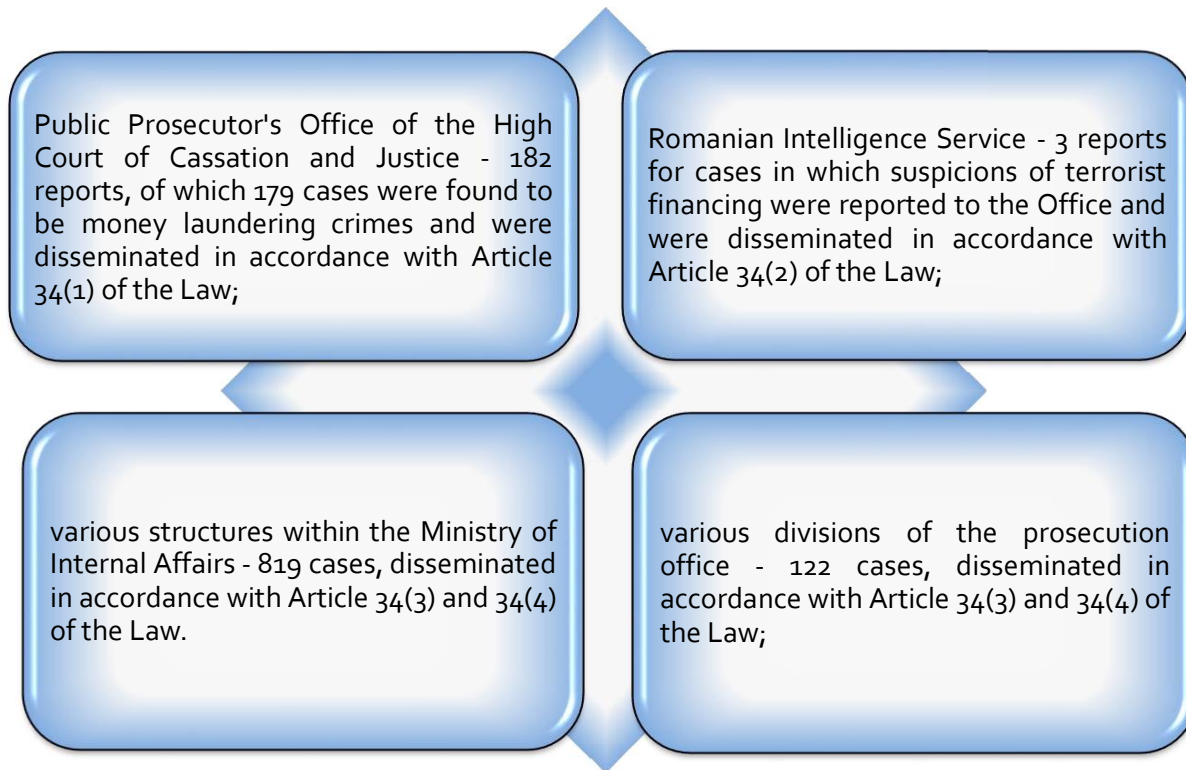
Following the information submitted by the Office to the Prosecutor's Office of the High Court of Cassation and Justice and based on Suspicious Transaction Reports with not effected operations, the law enforcement authorities ordered the establishment of precautionary measures for the amounts of EUR 16,613,980, USD 1,564,014 and RON 48,752.

Dissemination of information

In accordance with the provisions of Law 129/2019, the Office disseminates, spontaneously or upon request, the results of analytical processes, in the form of information and responses to requests for information.

As regards **the spontaneous dissemination** process, during 2024, this activity continued to be further streamlined, with the main focus on getting information to law enforcement and competent authorities in the shortest possible time.

The results of the financial analyses were finalised by sending the information to:



At the same time, in accordance with Article 34(4) of the Law, 117 other reports were submitted containing relevant aspects in the field of activity of competent authorities such as supervisory, tax, customs or public institutions.

Under Article 36(1) of the Law, which provides for the possibility for the Office to exchange information on its own initiative with foreign institutions having similar functions or with other competent authorities of Member States or third countries, 51 spontaneous information requests were sent to partner Financial Intelligence Units.

As regards the process of **dissemination upon request**, this concerns the transmission of data and information held by the Office and which it has received in accordance with the relevant legal provisions, to the Public Prosecutor's Office of the High Court of Cassation and Justice, the European Public Prosecutor's Office, the Romanian Intelligence Service and the criminal prosecution authorities.

Upon request dissemination is carried out according to:

- ❖ Article 35 of Law 129/2019 with subsequent amendments and supplements, at the request of the competent authorities at national level motivated by suspicions of money laundering, crimes generating assets subject to money laundering or terrorist financing;
- ❖ Article 7 of Ordinance No 9/2021 on the establishment of measures to facilitate the use of financial information and financial analysis for the prevention, detection, investigation or prosecution of certain crimes, upon reasoned request of the competent authorities;

- ❖ the provisions of Law 51/1991 on Romania's national security, at the request of the bodies in charge of national security.

In 2024, 148 responses to requests for information from the competent authorities at the national level provided for by law, 16 responses to requests made under Ordinance No 9/2021 and 209 responses to requests for information from the bodies with national security competences were disseminated.

Keeping information received in the Office's records

The analysis process carried out at the level of the Office may, in accordance with the legal provisions, also be concluded with the retention of information, when there are no indications of money laundering, suspicions of terrorist financing or indications of the commission of crimes other than money laundering or terrorist financing. During 2024, 20,484 cases were finalised in this way.

Priority objectives for 2025

For 2025, the Analysis and Information Processing Directorate aims to:



PREVENTION, SURVEILLANCE AND CONTROL

The activities of surveillance, control and training of obliged entities, carried out by the Prevention, Surveillance and Control Directorate, are an **essential component** of the institutional responsibility of the Office for the **prevention of money laundering, terrorist financing and the implementation of international sanctions**.

Surveillance, control and training activities were based on a number of specific objectives, including:



Analysing and processing information extracted from the Office's internal and external databases in order to identify entities exposed to the risk of money laundering and terrorist financing **by assessing their degree of vulnerability to these risks;**



Increasing the level of knowledge and correct interpretation of the legal obligations in the field of preventing and combating money laundering and terrorist financing, as well as of the regulations on the implementation of international sanctions, which are the obligations of the obliged entities. This objective was achieved **through the training activities carried out both in the framework of the control actions** and the training sessions organised annually by the Office for all categories of obliged entities;



Improving the awareness and compliance of obliged entities with legal obligations on preventing and combating money laundering and terrorist financing, as well as with the regulations on the implementation of international sanctions, **through the control activities carried out towards them;**



Analysing and correlating the information obtained during control activities with data from the Office's internal and external databases when **suspensions of money laundering or terrorist financing are identified.**

The surveillance and control activity carried out by the Prevention, Surveillance and Control Directorate involves:

- **off-site surveillance** of the obliged entities in the Office's portfolio. The activity shall be carried out on the premises of the institution, using an analytical tool pre-established at institutional level and based on a risk-oriented approach, taking into account the degree of exposure of the obliged entities to money laundering and terrorist financing risks;

- **carrying out control actions (on-site surveillance)** as required by law, as follows:

- a) according to the provisions of Article 26 para.(1) letter d) of Law 129/2019, in order to verify the application of the legal provisions in the field of prevention of money laundering and terrorist financing, to all obliged entities that are not subject to the surveillance of the authorities referred to in Article 26 para. (1) letter a) of Law 129/2019;

- b) according to the provisions of Government Decision No 603/2011 for the approval of the Rules on the supervision by the National Office for Prevention and Control of Money Laundering of the implementation of international sanctions, on the manner of implementation of international sanctions by regulated entities, on all obliged entities that are not subject to the surveillance of the authorities referred to in Article 26 para. (1) letter a) of Law 129/2019;

- c) according to Article 12 para. (1) letter l) of GEO No 202/2008 on the implementation of international sanctions, with subsequent amendments and supplements, including with the amendments made by GEO No 135/2024, to obliged entities that are not subject to surveillance by the authorities referred to in Article 26 para.(1) letter a) of Law 129/2019;

- d) according to the provisions of Article 57 of Law 129/2019 to legal entities subject to the obligation to register in the Trade Register on how to comply with the provisions of Article 56 of Law 129/2019;

- e) according to the provisions of Article 34⁵ para. (2) of Government Ordinance No 26/2000 on associations and foundations, approved with amendments and supplements by Law 246/2005, with subsequent amendments and supplements, to associations and foundations regarding the manner of complying with the provisions of Article 34⁴ of Government Ordinance No 26/2000, approved with amendments and supplements by Law 246/2005, with subsequent amendments and supplements;

- f) controls according to the provisions of Article 26 para. (3) of the Law, on legal entities and entities without legal personality, other than those under the supervision of the National Bank of Romania and the Financial Supervisory Authority, when the data held by the Office indicate suspicions of money laundering or terrorist financing, with regard to the transactions carried out by them.

The year 2024 was a significant period for the Prevention, Surveillance and Control Directorate, marked by active involvement in a wide range of specific activities relevant to the surveillance and control process. In a constantly changing context, a proactive approach was adopted in relation to changes in AML regulations, by implementing effective measures adapted to the new requirements.

Also, a key aspect of the work has been to adapt to rapid developments in a fast-changing industry, emphasising fundamental principles such as transparency, institutional collaboration and continuous development of the skills of the financial analyst team.

In line with these values, we have prioritised not only compliance with FATF standards, but also the promotion of an organisational culture focused on convergent supervision, reflecting a strong commitment to integrity and efficiency in the crucial area of preventing and combating money laundering.

OFF-SITE SURVEILLANCE ACTIVITY

Based on the provisions of Law 129/2019 on preventing and combating money laundering and terrorist financing, as well as amending and supplementing some regulatory acts, with subsequent amendments and supplements, the National Office for Prevention and Control of Money Laundering has powers to supervise and control the manner of applying the provisions of the special law and secondary legislation by the obliged entities provided by law that are not supervised by the NBR and FSA.

The surveillance activity is carried out through an operational system specific to the risk-based approach, which involves the application of analytical processes to assess risk indicators, thus determining the level of exposure to money laundering and terrorist financing (ML/TF) risks of the obliged entities under the surveillance of the Office, depending on the degree of compliance with the relevant legal obligations.

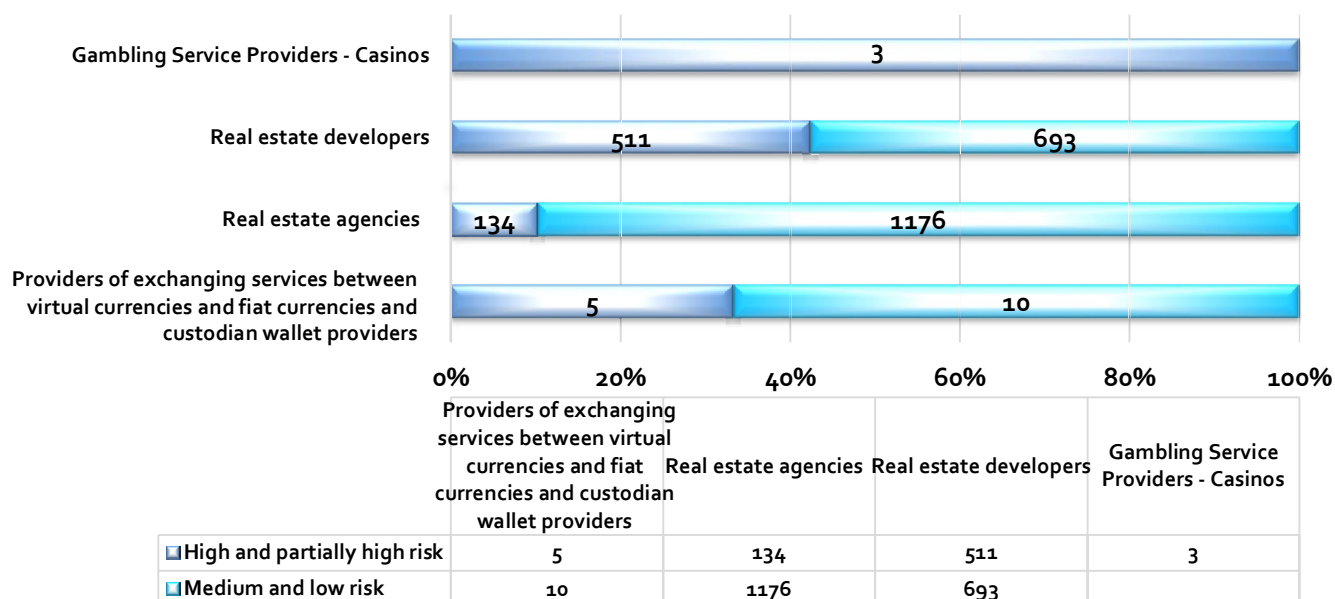
The determination of the frequency and intensity of surveillance activity is based on a risk assessment, taking into account the results of the National Evaluation Report on Money Laundering and Terrorist Financing (ENR).

In 2024, a total of 4,305 obliged entities falling under the scope of Law 129/2019 Article 5 para. (1) were supervised off-site, the areas of activity identified and assessed in the ENR as being exposed to money laundering, generally coming from high-risk geographical areas, namely Bucharest Municipality and the Counties of Brasov, Cluj, Prahova, Arad, Bihor, Iasi, Maramureş, Suceava, Timis, Dolj, Vaslui and Argeş:

HIGH RISK AREAS ACCORDING TO ENR	NUMBER OF ENTITIES
Real estate developers	1,204
Real estate agencies	1,310
Providers of exchanging services between virtual currencies and fiat currencies and custodian wallet providers	15
Gambling Service Providers - Casinos	3
TOTAL	2,532

Following the assessment of the off-site surveillance areas with high risk according to the ENR, within the analytical process, of the exposure degree to the risk of money laundering and terrorist financing, based on the data and information available at the NOPCML level, the following results were obtained, based on which verification and control actions were initiated for entities categorised as high risk and partially high risk.

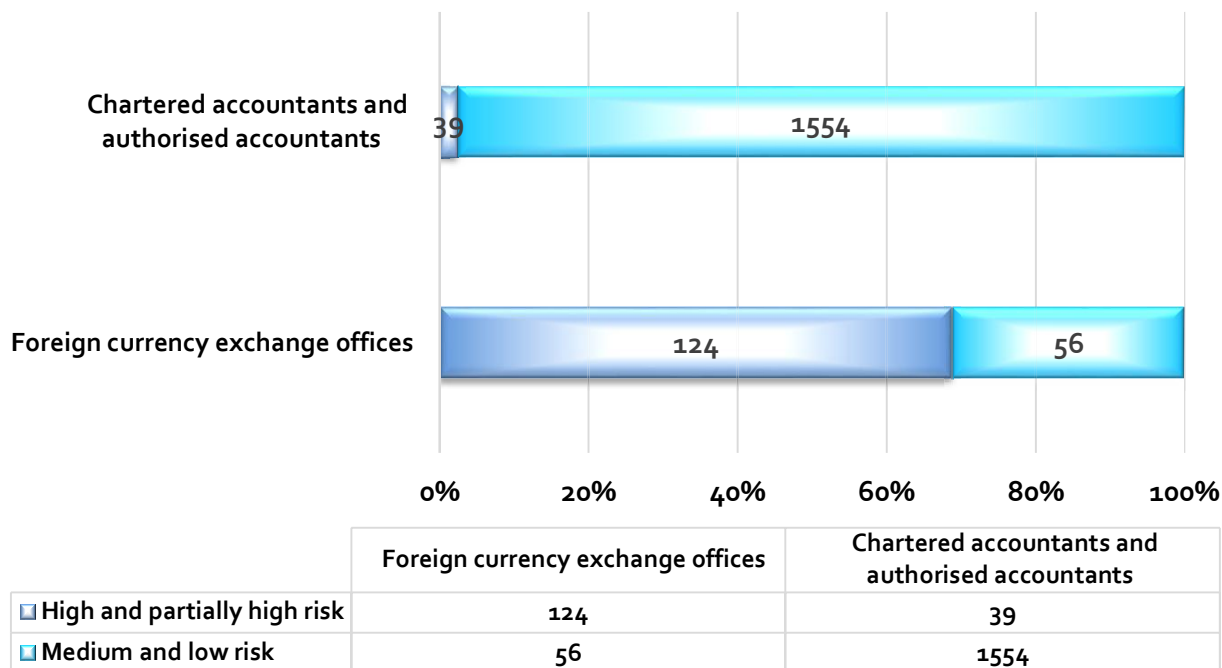
RISK CLASSIFICATION STRUCTURE OF ENTITIES, RESULTING FROM OFF-SITE SURVEILLANCE



MEDIUM RISK AREAS ACCORDING TO ENR	NUMBER OF ENTITIES
Foreign currency exchange offices	180
Chartered accountants and authorised accountants	1,593
TOTAL	1,773

As a result of the assessment of the areas of off-site surveillance with medium risk according to the ENR, within the analytical process, of the degree of exposure to the risk of money laundering and terrorist financing, based on the data and information available at the NOPCML level, the following results were obtained, based on which verification and control actions were initiated for entities categorised as high risk and partially high risk.

RISK CLASSIFICATION STRUCTURE OF ENTITIES, RESULTING FROM OFF-SITE SURVEILLANCE



SITUATION OF THE AREAS OF ACTIVITY COVERED BY OFF-SITE SURVEILLANCE

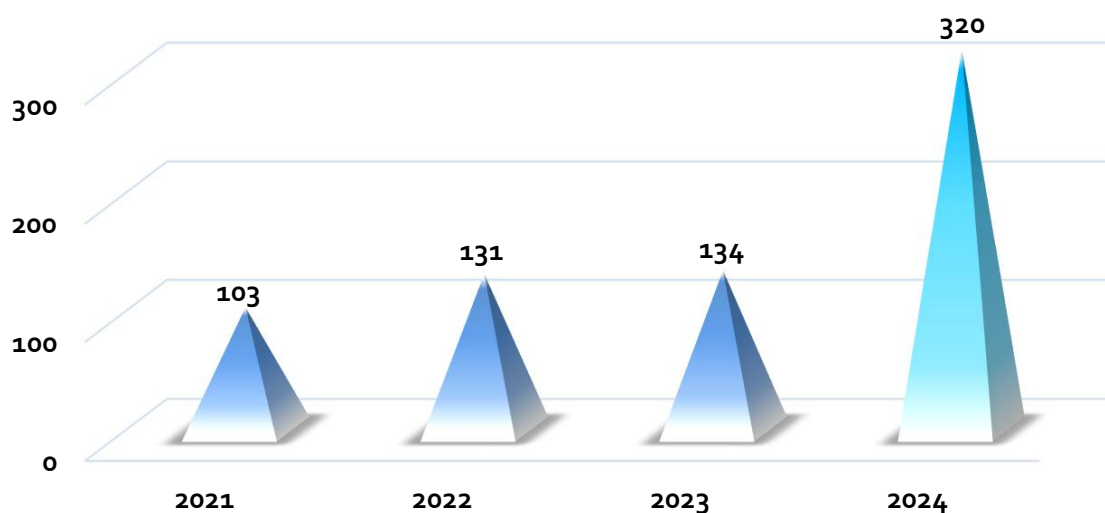
AREA	COUNTY
2021	
Authorised evaluator	At national level
Foreign currency exchange offices	B, PH, AG
Consultancy and management activities	BR, BZ, CL, DB, GR, IL, TL
2022	
Real estate developers	IF
Service providers to companies or trusts - 'Activities of holding companies'	B, IF
Real estate agencies	B
Providers of exchanging services between virtual currencies and fiat currencies and custodian wallet providers	B, BH, BV, CJ, CT, IF, SM

AREAS	COUNTY
2023	
Business and management consultancy activities	B, CJ, PH
Real estate agencies	BV, CJ, CT, IF, PH
Real estate developers	BV, B, CJ, CT, PH
Land-based casinos	B
Online gambling providers	B, IF, SB
Tax consultants	IF, CT, PH
Chartered accountants and authorised accountants	BV, B
2024	
Real estate developers	AR, BH, IS, MM, SV, TM
Real estate agencies	AR, BH, IS, MM, SV, TM
Providers of exchanging services between virtual currencies and fiat currencies and custodian wallet providers	At national level
Foreign currency exchange offices	B, AR, BH, IS, MM, SV, TM
Gambling Service Providers - Casinos	B
Chartered accountants and authorised accountants	AG, BH, DJ, IS, PH

ON-SITE SURVEILLANCE

In terms of on-site surveillance, **320 verification and control actions** were carried out at the premises of obliged entities during 2024.

NUMBER OF ENTITIES SUPERVISED ON-SITE ANNUAL DEVELOPMENT

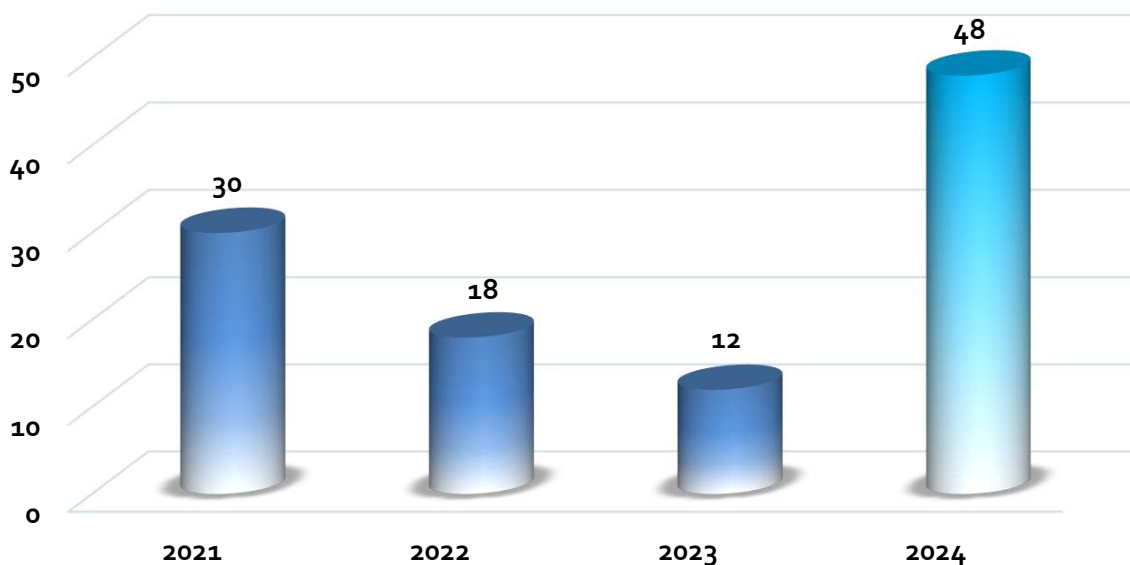


**NUMBER OF ENTITIES SUPERVISED ON-SITE
BY AREA OF ACTIVITY AND GEOGRAPHICAL AREA**

Real estate developers	199 on-site surveillance actions in Brasov, Bucharest, Cluj, Constanta, Iasi, Prahova and Suceava Counties
Activities of holding companies	2 on-site surveillance actions in Bucharest Municipality
Real estate agencies	3 on-site surveillance actions in Iasi and Prahova Counties
Business and management consultancy activities	5 on-site surveillance actions in Prahova County
Foreign currency exchange offices	10 on-site surveillance actions in Bucharest Municipality
Online gambling service providers	5 on-site surveillance actions in Bucharest Municipality and Sibiu County
Gambling Service Providers - Casinos	2 on-site surveillance actions in Bucharest Municipality
Tax consultants	7 on-site surveillance actions in Ilfov, Cluj, Prahova and Argeş Counties
Notaries Public	7 on-site surveillance actions in Gorj, Dolj, Cluj, Bucharest and Maramureş Counties
Chartered accountants and authorised accountants	80 on-site surveillance actions in Prahova, Argeş, Bihor, Braşov, Bucharest, Dolj, Iasi and Constanţa Counties

Out of the 320 entities supervised on-site by the NOPCML , a total of 48 entities were sanctioned for non-compliance with the provisions of Law 129/2019 on preventing and combating money laundering and terrorist financing, as well as for amending and supplementing some regulatory acts, with subsequent amendments and supplements, GD No 603/2011 for the approval of the Rules for surveillance by the National Office for Prevention and Control of Money Laundering of the implementation of international sanctions, with subsequent amendments and supplements and GEO No 53/2022 on amending and supplementing Law 129/2019 for preventing and combating money laundering and terrorist financing, as well as for amending and supplementing some regulatory acts, approved by Law 218/2023, respectively 31 fines and 45 warnings were applied.

DEVELOPMENT OF THE NUMBER OF ENTITIES SANCTIONED ANNUALLY



SANCTIONS APPLIED AND LEGAL PROVISIONS INFRINGED

Real estate developers - 199 controlled entities

24 entities sanctioned

- 15 fines totalling RON 325,000 - for non-compliance with Law 129/2019 and GEO 53/2022
- 24 warnings - for non-compliance with Law 129/2019 and GEO 53/2022

Activities of holding companies - 2 controlled entities

0 entities sanctioned

- 0 fines
- 0 warnings

Real estate agencies - 3 controlled entities

0 entities sanctioned

- 0 fines
- 0 warnings

**Business and management consultancy activities -
5 controlled entities**

0 entities sanctioned

- 0 fines
- 0 warnings

Foreign currency exchange offices - 10 controlled entities

6 entities sanctioned

- 9 fines totalling RON 130,000 - for non-compliance with Law 129/2019 and GD 603/2011
- 3 warnings - for non-compliance with Law 129/2019 and GD 603/2011

Online gambling service providers - 5 controlled entities

1 entity sanctioned

- 0 fines
- 1 warning - for non-compliance with Law 129/2019

Gambling Service Providers - Casinos - 2 controlled entities

1 entity sanctioned

- 2 fines totalling RON 92,000 - for non-compliance with Law 129/2019 and GD 603/2011
- 1 warning - for non-compliance with Law 129/2019

Tax Consultants - 7 controlled entities

2 entities sanctioned

- 1 fine of RON 12,000 - for non-compliance with Law No 129/2019 and GD 603/2011
- 2 warnings - for non-compliance with Law 129/2019 and GD 603/2011

Notaries Public - 7 controlled entities

4 entities sanctioned

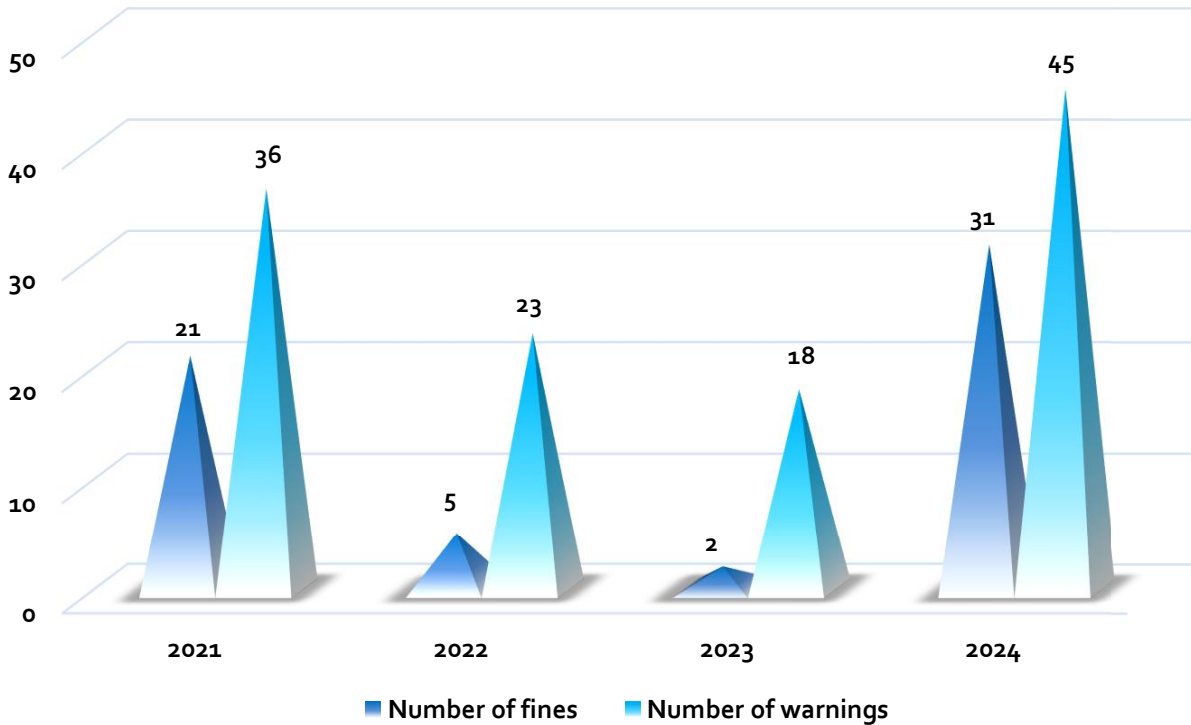
- 0 fines
- 4 warnings - for non-compliance with Law 129/2019

Chartered accountants and authorised accountants - 80 controlled entities

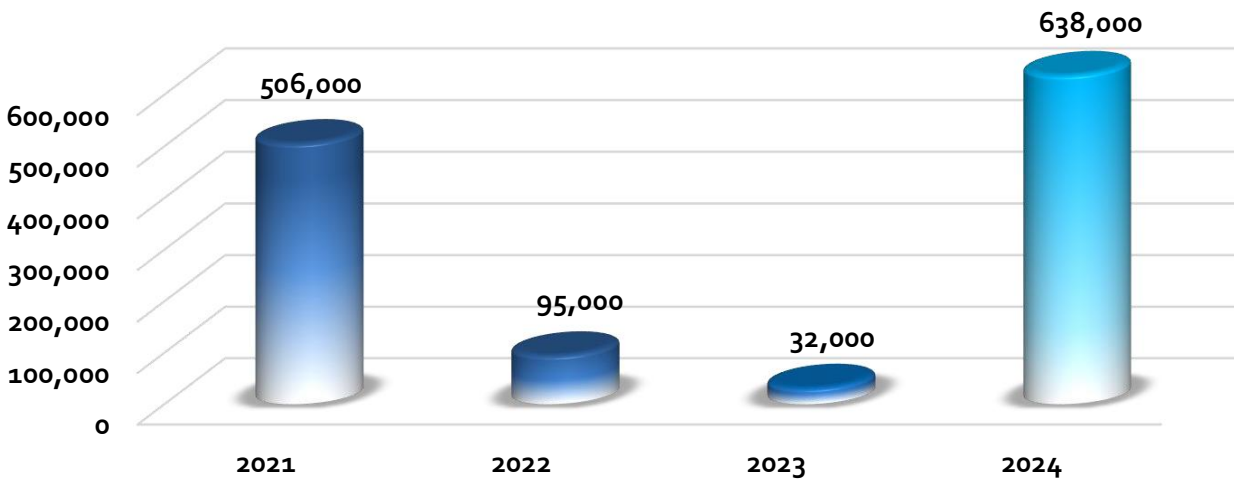
10 entities sanctioned

- 4 fines totalling RON 79,000 - for non-compliance with Law 129/2019 and GD 603/2011
- 10 warnings - for non-compliance with Law 129/2019 and GD 603/2011

DEVELOPMENT OF THE NUMBER OF SANCTIONS APPLIED



DEVELOPMENT OF THE AMOUNT OF FINES IMPOSED (RON)



THE IMPORTANCE OF ON-SITE SURVEILLANCE OF OBLIGED ENTITIES

The verification and control actions are orientated towards ensuring the compliance of the obliged entities with the legislation in the field of preventing and combating money laundering. These actions aim not only at verifying compliance, but also at educating and raising awareness of the controlled entities. They are structured as follows:

1. Verification of legal compliance:

Compliance with primary and secondary legislation by obliged entities is monitored. The purpose of this verification is both to ensure the correct application of the regulations in force and to increase the entities' awareness of money laundering risks, including the application of international sanctions.

2. Training of representatives/employees:

Representatives and employees of the audited entities are trained by the investigating officers on the legislative provisions and their correct application. Thus, they better understand the regulations and how to interpret them in order to prevent and combat money laundering.

3. Identifying suspicious activities:

The operations, circuits and activities of entities are analysed to identify possible suspicious money laundering transactions.

4. Improve the quality of suspicious transaction reports:

It aims to increase the quality of suspicious transaction reports by educating entities on the correct application of know-your-customer measures, monitoring the business relationship and risk assessment.

5. Reports of cash transactions and external transfers:

The aim is to increase the number and quality of reporting of cash transactions and foreign transfers through the correct application of the relevant regulations. These reports are essential for detecting illegal activities and minimising money laundering risks.

6. Promoting a culture of compliance:

It is important to create an organisational culture that emphasises compliance with the law. This is achieved by making obliged entities aware of the importance of compliance with the legal provisions in the area of preventing and combating money laundering and terrorist financing and in the implementation of international sanctions.

7. Enforcement of contraventional sanctions:

Where entities do not comply with the relevant legislation, contraventional sanctions can be imposed, and the aim of these measures is to ensure swift compliance with the law and to increase awareness of the legislation.

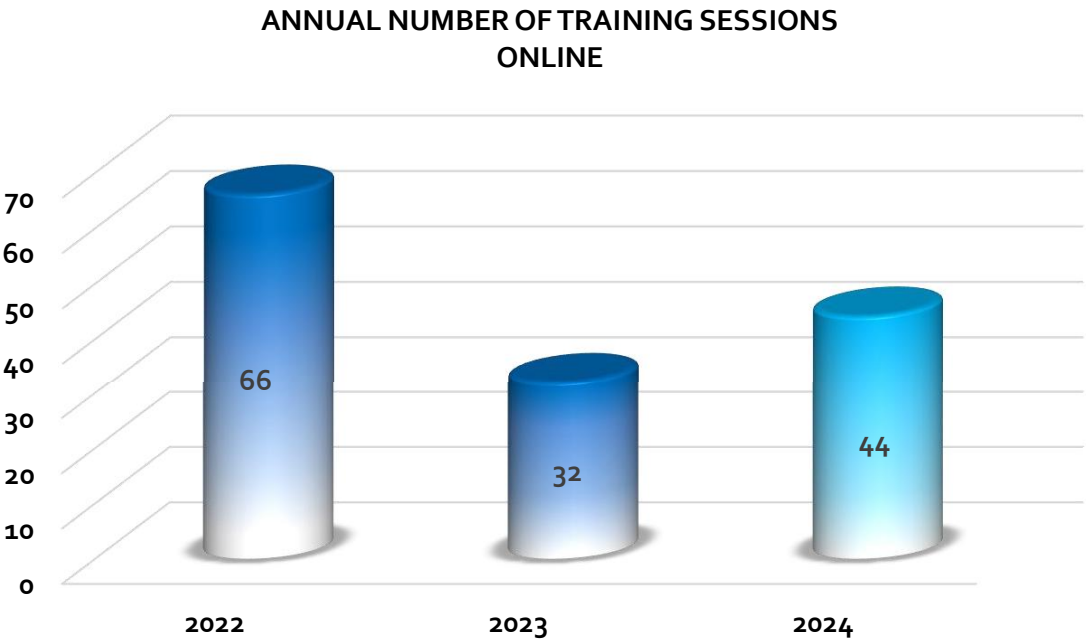
These control and verification actions are essential to strengthen the rules to prevent and combat money laundering.

TRAINING ACTIVITY

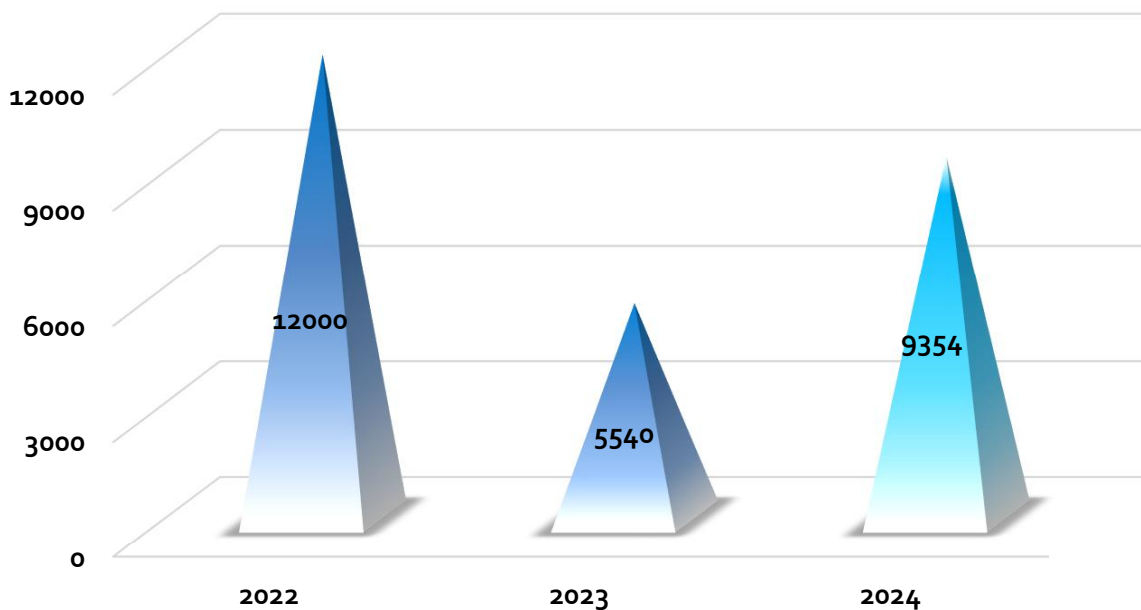
Based on the provisions of Article 39 para. (3) letter p) of Law 129/2019 on preventing and combating money laundering and terrorist financing, with subsequently amendments and supplements, the National Office for Prevention and Control of Money Laundering shall organise, free of charge, training in the field of preventing the use of the financial system for the purpose of money laundering and terrorist financing and on how to implement international sanctions, for all categories of obliged entities referred to in Article 5 of Law 129/2019 on preventing and combating money laundering and terrorist financing, as amended and supplemented.

The frequency with which the National Office for Prevention and Control of Money Laundering organised training seminars for each category of obliged entities took into account the risk of exposure to money laundering/terrorist financing associated with the obliged entities' business, as assessed in the **National Evaluation Report on Money Laundering and Terrorist Financing Risks**.

During 2024, in accordance with the annual training plan, the National Office for Prevention and Control of Money Laundering, through the Prevention, Surveillance and Control Directorate, organised a total of **44** online **training sessions** in the field of prevention and combating money laundering and terrorist financing for all categories of obliged entities, training sessions attended by **9354** representatives of obliged entities from all over the country. At the same time, the representatives of the 320 obliged entities supervised on-site were trained by the investigating officers on compliance with legal obligations and on the risks of money laundering and terrorist financing to which the entities are exposed in their activity.



NUMBER OF PARTICIPANTS IN ONLINE TRAINING SESSIONS



The training of obliged entities, carried out by the designated personnel of the NOPCML, had the following objectives:

- presentation of the results of the National Evaluation Report on Money Laundering and Terrorist Financing Risks, according to the specific field of activity of the obliged entities, in order to increase their awareness of the risks of exposure to the phenomenon of money laundering and terrorist financing with the aim of managing and minimising the risks that the obliged entities may be used in criminal activities of money laundering and terrorist financing;
- a clear and structured presentation of the information necessary for the obliged entities to know and understand the legal provisions on preventing and combating ML/TF ;
- raising the awareness of obliged entities on the importance of compliance with legal provisions in the field of preventing and combating ML/TF and how to implement international sanctions;
- emphasising the importance of know-your-customer and beneficial owners obligations on a risk-based basis and limiting beneficial owners measures to verification in central registers;
- facilitating the recognition and reporting by the obliged entities of suspicious transactions by understanding how obliged entities apply know-your-customer, acceptance and monitoring customers, beneficial owners and risk assessment;
- presentation of criteria and rules for recognising high or low risk situations of money laundering and/or terrorist financing, suspicious indicators and typologies of ML/TF, specific to each sector, underlining the importance of transaction monitoring in order to detect suspicious transactions.
- implementation of the regime of international sanctions; verification of clients and their beneficial owners using the search engines available on the NOPCML website in order to identify persons and entities subject to international sanctions.

During the online training sessions, together with the lecturers from the Prevention, Supervision and Control Department of the NOPCML, presentations on current theoretical/practical issues related to the prevention and combating money laundering/terrorist financing specific to each sector were given by representatives of the other supervisors (NGO, NBR and FSA), as well as representatives of self-regulatory organisations (NARB, NUNPR, RNAPI, NAJE, BELAR, NARVR, CFAR), which aimed at drawing attention to the money laundering and terrorist financing risks that obliged entities might face in their activities and the risk levels associated with the various areas of activity.

CO-OPERATION WITH SELF-REGULATORY BODIES AND NGO

During 2024, in order to efficiently fulfil the tasks of training, supervision and control of the application of the legal provisions by the obliged entities that have self-regulatory bodies and by those in the field of gambling, provided for in Article 5 of Law 129/2019, the Office cooperated with the self-regulatory bodies and with the NGO, with the aim of increasing the effectiveness of the system for preventing and combating money laundering and terrorist financing in Romania, through a series of actions which involved:

1. Organisation of working meetings between representatives of NOPCML, as supervisory authority and representatives of NUNPR, RNAPI, NARB, NAJE, which had as main objectives: to establish the general framework for the effective execution, through a risk-based approach (according to the provisions of Article 26 of Law 129/2019 on preventing and combating money laundering and terrorist financing, as subsequently amended and supplemented) of the surveillance and control of the application of the legal provisions in the field of AML/CFT, by the obliged entities that have self-regulatory bodies, as well as the execution in partnership of the training of the obliged entities in the specific field of activity.

2. Analysing and formulating proposals and comments with a view to issuing and transmitting on the basis of Article 59 (2) of Law 129/2019 on preventing and combating money laundering and terrorist financing, with subsequent amendments and supplements, of points of view on the sectoral regulations issued in the field of preventing and combating money laundering and terrorist financing by self-regulatory bodies (RNAPI, NARB, NAJE) on the basis of Article 59 (1) of Law 129/2019 on preventing and combating money laundering and terrorist financing, as amended and supplemented, as follows:

Sectoral Regulations Draft for the application of Law 129/2019 for preventing and combating money laundering and terrorist financing, issued by the Council of the National Association of the Romanian Bars (NARB), adopted by NARB Council Decision no. 98/30.08.2024 with entry into force on 20.01.2025;

Sectoral Regulations Draft in application of Law 129/2019 on preventing and combating money laundering and terrorist financing (RNAPI);

Sectoral Regulations Draft in application of Law 129/2019 on preventing and combating money laundering and terrorist financing (NAJE).

3. The co-operation and collaboration with the self-regulatory bodies also consisted in supporting them with the materials necessary for the issuance, based on the provisions of Article 1 para. (4) of Law 129/2019, of the documents necessary for the assessment of the risk of money laundering and terrorist financing at sectoral level, by issuing by the Office the "Guidelines dedicated to the self-regulatory bodies necessary for the sectoral assessment of the exposure risks to ML/TF related to regulated liberal professions".

4. To develop, negotiate and participate in the conclusion of a cooperation agreement between the NOPCML and the RNAPI and to update the co-operation agreements with the self-regulatory bodies and the NGO, in order to increase the effectiveness of the activities to prevent and combat money laundering and terrorist financing.

5. Collection from self-regulatory bodies (NARB, NUNPR, RNAPI, NAJE, BELAR, CTA, NARVR, CFAR) and NGO of information and statistical data on the size and importance of each sector.

6. Conducting training sessions for obliged entities, organised by the NOPCML in collaboration with self-regulatory bodies, NGO, NBR and FSA. During the training sessions held in on-line format, together with lecturers from the Prevention, Surveillance and Control Directorate of the NOPCML, presentations were given on current theoretical/practical issues related to the prevention and combating of money laundering/terrorist financing, specific to each sector, and representatives of the self-regulatory organisations (NARB, NUNPR, RNAPI, NAJE, BELAR, NARVR, CFAR), NGO, NBR and FSA.

OTHER ACTIVITIES CARRIED OUT BY DPSC DURING 2024

1. Participation to the Fifth Round of Mutual Evaluation of Romania by the Committee of Experts of the Council of Europe - Moneyval (in which the Romanian state is assessed on how it complies with international requirements in the field of prevention and combating ML/TF), in the following specific activities:

- to ensure the participation of members in the NOPCML Working Group responsible for the preparation and management of the action plan for the implementation of the recommendations of the MER for the Fifth Round of the Moneyval Evaluation of Romania;
- to ensure the participation with members in the Validation and Finalisation Commission of the Follow-up Report for the Fifth Round of the Moneyval Evaluation of Romania;
- to provide the secretariat work for the NOPCML Working Group responsible for the preparation and management of the action plan for the implementation of the recommendations of the MER for the Fifth Round of the Moneyval Evaluation of Romania;
- to provide the secretariat work for the Validation and Finalisation Commission of the Follow-up Report for the Fifth Round of the Moneyval Evaluation of Romania;
- to ensure representation at the Moneyval Expert Group Meetings and at the 68th MONEYVAL Plenary Meeting from 2-6 December 2024.

2. Active participation in Romania's OECD accession process:

- Contribution to Romania's assessment by the OECD Global Forum, on the exchange of information upon request, by providing comments to the final report and participation in the Romanian delegation to the Peer Review Group in Paris from 26.02.2024-01.03.2024;
- Contribution to the assessment of Romania by the OECD Global Forum on automatic exchange of information through participation in the Romanian delegation to the on-site visit, comments, working sessions;
- Contribution to the evaluation of Romania by the OECD-WGB (Working Group on Bribery) by participating in the Romanian delegation to the on-site visit, participating in the elaboration of the answers to the questionnaire, participating in the implementation of the recommendations - part of the working group set up by the Ministry of Justice.

3. The sectoral ML/TF risk assessment has been conducted for the providers of exchanging services between virtual currencies and fiat currencies and custodian wallet providers in Romania.

4. The Office, as supervisor, has issued a number of guidelines relevant for understanding the risks, recognising suspicions of ML/TF and in order to implement the recommendations of the MER for the Fifth Round of Moneyval Assessment of Romania, by developing a series of guidelines:

- Guidelines for self-regulatory organisations to carry out sectoral risk assessments of ML/TF exposure to regulated liberal professions;
- Guidelines on the identification of publicly exposed persons;
- Practical guidelines to anti-money laundering/counter-terrorist financing in the real estate sector;
- Guidelines on money laundering typologies in the field of precious metals and stones trade;
- Guidelines on techniques for national implementation of international sanctions by obliged entities supervised and controlled by the National Office for Prevention and Control of Money Laundering.

5. Formulating proposals in the process of drafting and endorsing draft legislative acts, namely:

- Draft Government Decision approving the procedure for the authorisation or registration of providers of exchanging services between virtual currencies and fiat currencies and custodian wallet providers, as well as the procedure for granting and withdrawing the technical approval;
- Draft Law amending Law 129/2019 on preventing and combating money laundering and terrorist financing;
- Draft Emergency Ordinance amending Emergency Ordinance No. 202/2008 on the implementation of international sanctions.

6. Updating the operational procedures governing the Directorate's activity and issuing new procedures in order to implement the recommendations of the MER related to the Fifth Round of the Moneyval Evaluation of Romania.

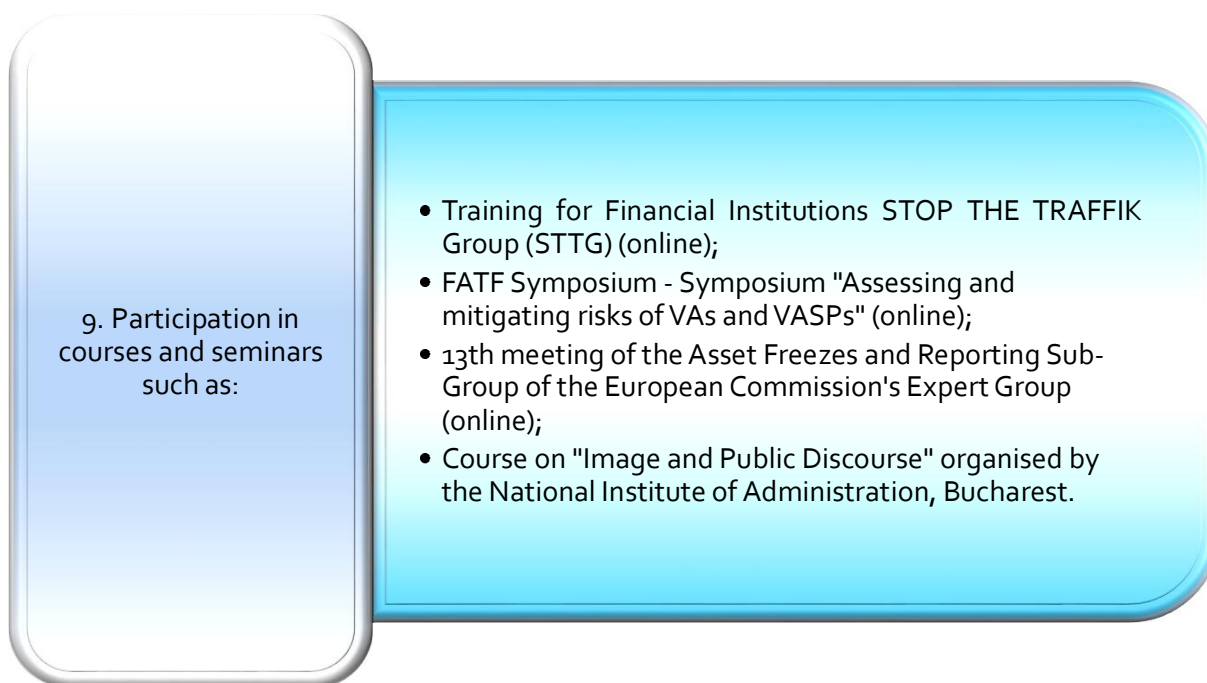
7. Participation in specific activities as members of committees and working groups, such as:

- Foreign Exchange Activity Authorisation Commission of the Ministry of Finance;
- Developing NOPCML contribution to CIISI - SCND report;
- Working group for the development of draft legislation necessary for the transposition of Directive (EU) 2024/1640 and the national application of Regulation (EU) 2024/1624 established by PO 272/27.09.2024;
- Follow-up the implementation of the recommendations of the MER related to the Fifth Round of the Moneyval Evaluation of Romania according to the competences of the PSCD and drafting of documents;
- Working meetings in the process of implementing the new AML Package adopted by the European Parliament and the European Council on 31 May 2024 which strengthens the European Union's toolbox to combat money laundering and terrorist financing.

8. Participation in different conferences and meetings such as:

- Conference "Charting the Course in AML/CFT Administrative Enforcement in the European Commission (online); t", FIU Malta, Attard
- Event to present the new AML package (NOPCML in collaboration with representatives of the European Commission): "The new European AML/CFT regulations: challenges and perspectives";
- International Anti-Money Laundering Workshop organised by the Central Bank of the Netherlands, Amsterdam;
- Participation in the 12th edition of the "Meeting of Gambling Professionals 12";
- Workshop on Recognising and Disrupting Front Companies to Prevent Chemical Weapons Proliferation;
- MONEYVAL online session on the draft effectiveness questionnaire for the Sixth Round;
- 41st Meeting of the Expert Group on Money Laundering and Terrorist Financing of the European Commission (online);
- 42nd Meeting of the Expert Group on Money Laundering and Terrorist Financing of the European Commission (online);
- 43rd meeting of the Expert Group on Money Laundering and Terrorist Financing;
- 25th meeting of the Standing Committee on Anti-Money Laundering and Countering Terrorist Financing of the European Banking Authority, Paris, France;
- 26th meeting of the Standing Committee on Anti-Money Laundering and Countering Terrorist Financing of the European Banking Authority, Paris, France;
- Presentation event for the platform BORIS v3.0 DRAFT - BRIS Collaborative Space - EC Extranet Wiki (europa.eu);
- USA - Eastern Europe Cryptocurrency Working Group Meeting, Organiser USA Embassy, Budapest, Hungary;
- USA - Eastern Europe Cryptocurrency Working Group Meeting, Organiser USA Embassy, Opatija, Croatia;
- Online session on recognising and blocking front companies to prevent proliferation of chemical weapons - USA Department of State - Pacific Northwest Laboratory (online);
- FATF Consultative Forum and private sector meeting on FATF Recommendation 16, Vienna, Austria;
- Inter-sessional meeting convened by the Moneyval Secretariat, on: Moneyval - Sixth round of mutual evaluations - additional resource needs (online)
- Moneyval expert group meetings and participation in the 68th MONEYVAL Plenary Meeting, Strasbourg, France;
- Virtual Assets Contact Group (VACG) Symposium (online);
- Presentation on "New European AML/CFT Regulations: Challenges and Perspectives", European Commission, Bucharest;
- Supervision of AML/CFT for the private sector, non-financial and VASP areas: practical application of sector-specific measures, organised by the Council of Europe, Vilnius, Lithuania;

- Presentation on "Crypto-assets: ML/TF risks, trading rules and supervision on AML/CFT" organised by the European Banking Authority (online);
- Presentation on the results of the Study on the interconnection of centralised automated mechanisms in the European Economic Area (BARIS) (online);



Within the Prevention, Supervision and Control Directorate, weekly training sessions are an essential practice for maintaining a high level of competence among financial analysts. The aim of these meetings is not only to deepen theoretical knowledge but also to apply it in analysing the specific activity of the structure, through interactive discussions and thematic presentations. This continuous training process ensures that financial analysts are always up to date with the latest developments and regulations in the specific field of activity of the Prevention, Supervision and Control Directorate.

Continuous professional training is therefore a strategic pillar of the Prevention, Supervision and Control Directorate's activity, helping to maintain the team's performance in a dynamic environment where legislative, technological and methodological changes are constant. The adaptability and up-to-date skills of analysts are thus essential for the successful fulfilment of the institution's objectives.

CO-OPERATION WITH PARTNER FIU. EUROPEAN AND INTERNATIONAL CONTEXT



In accordance with the provisions of Article 36 of Law 129/2019, the NOPCML, as Romania's financial intelligence unit, has the legal capacity to exchange financial information on its own initiative or upon request, on the basis of reciprocity, through protected channels of communication, with foreign institutions having similar functions or with competent authorities of other Member States or third countries, which are bound by similar conditions of secrecy, if such communications are made for the purposes of preventing and combating money laundering and terrorist financing, including the recovery of the proceeds of such crimes. ***This specific activity is managed at the level of NOPCML- FIU Romania through the Directorate of Cooperation, International Sanctions and Terrorist Financing, International Co-operation and Relations Service (DCISTF-ICRS).***

The secure channels for the international exchange of information are ***FIU.NET*** (a network managed by the European Commission for the exchange of information with FIUs and European competent agencies) and ***EGMONT SECURE WEB - ESW*** (a network managed by the Egmont Group of Financial Intelligence Units, which facilitates the exchange of information between the 177 FIU members of the Group).

Taking into account the provisions contained in the new legislative package in the field of preventing and combating money laundering adopted at European level in 2024, the international exchange of information with partners from EU Member States was realised in almost all cases through the secure ***FIU.NET*** network.

From an operational point of view, throughout 2024, every effort has been made at ICRS level to optimise response times and increase the quality of the information product delivered to external partners.

From a procedural perspective, the process of adapting the internal rules on the exchange of information also continued during the reporting period, with the amendments made with the aim, on the one hand, of increasing the capacity for operational processing of information exchange and, on the other hand, of adapting the rules on the methodology of capitalising on the information resulting from the international exchange of information at operational level.

From an external perspective, in 2024 the personnel involved in conducting international information exchange managed the preparation and production launch of the ***new FIU.NET NG system (Next Generation)***.

Also, a financial analyst from DCISTF-ICRS became a FATF expert assessor in 2024, following the completion of the FATF Joint Assessor Training (JAT) course organised by the FATF.

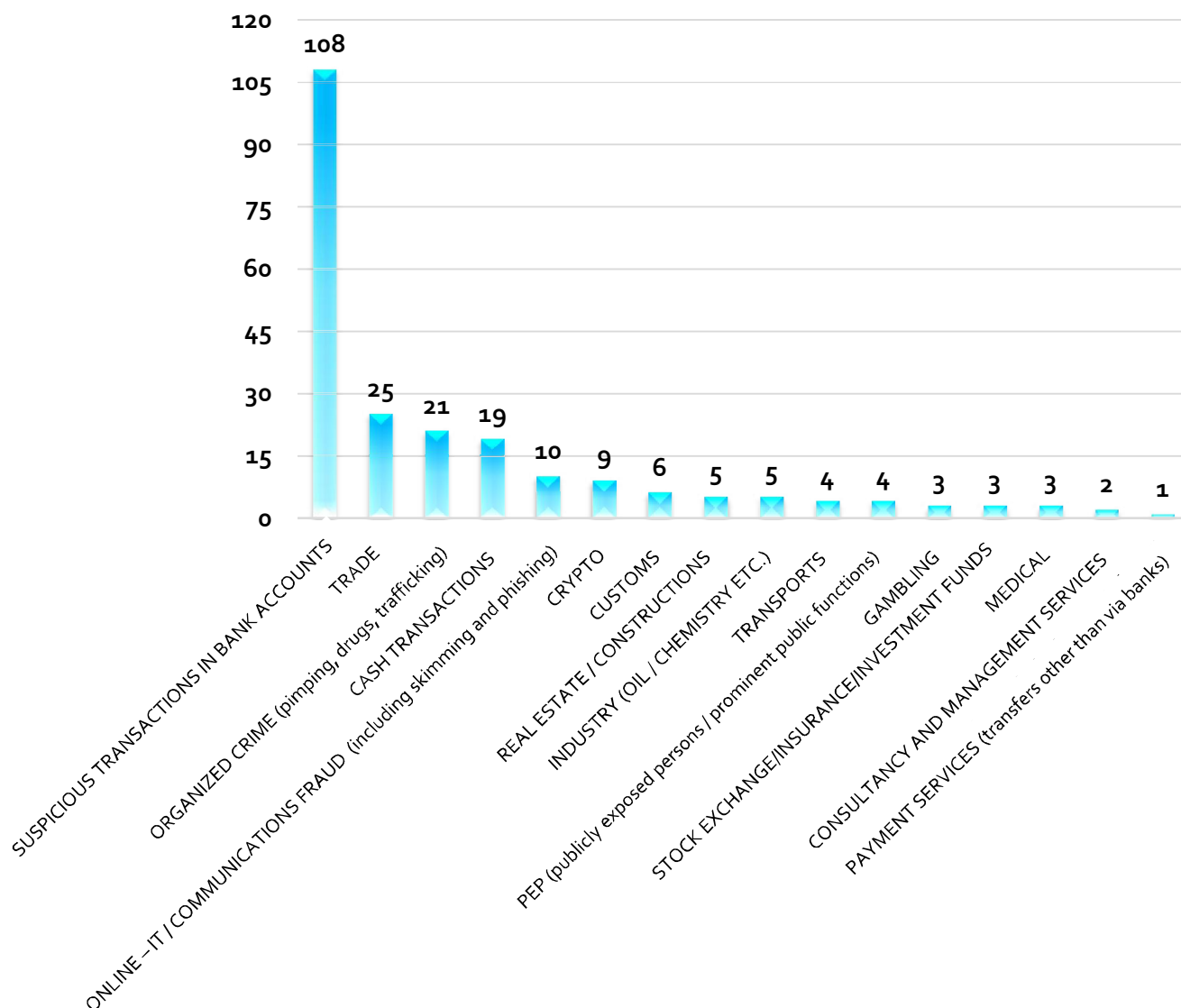
I. SPONTANEOUS INFORMATION AND REQUESTS FOR INFORMATION ADDRESSED TO THE NOPCML BY EXTERNAL PARTNERS (FOREIGN FINANCIAL INTELLIGENCE UNITS AND EUROPOL)

In 2024, FIU Romania received through its two secure communication channels, FIU.net and Egmont Secure Web - ESW, **196 requests for information, of which 23 were urgent** and a total of **201 spontaneous information, of which 6 were urgent**.

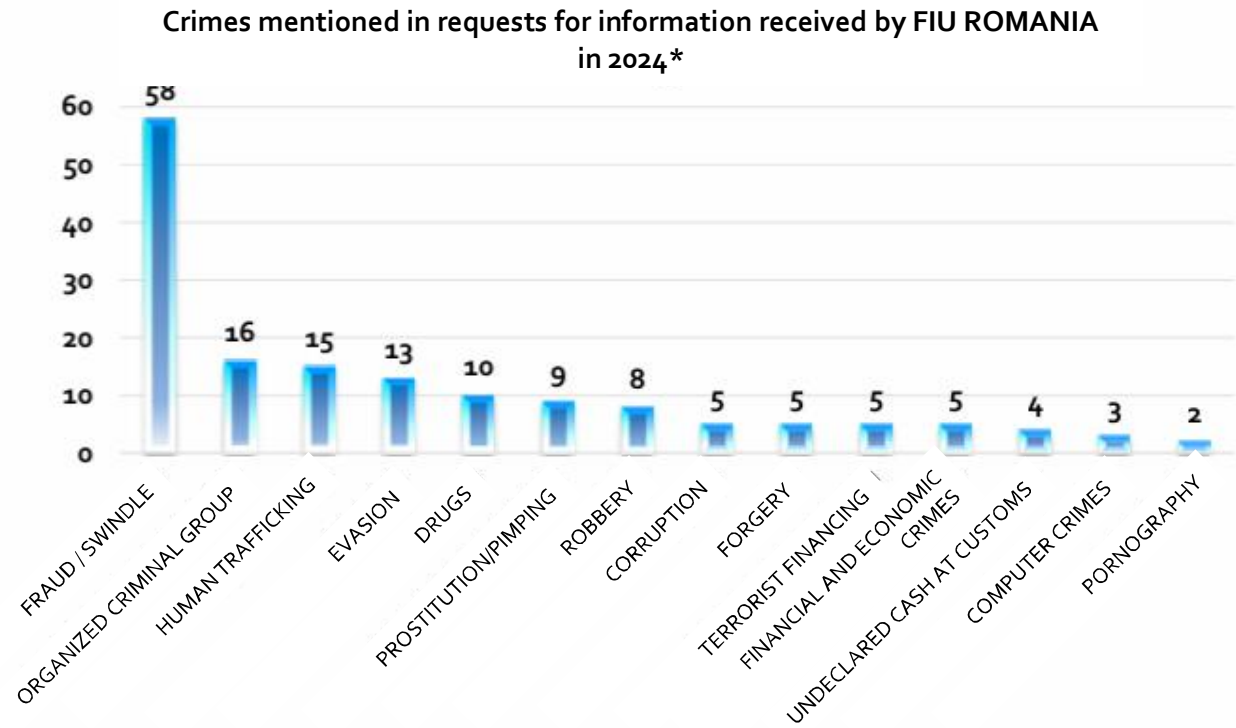
They targeted a total of **1861 natural persons and 697 legal entities**, of which:

- for information requests - 671 natural persons and 366 legal entities,
- for spontaneous information - 1190 natural persons and 331 legal entities.

**Areas of activity for requests for information received by FIU ROMANIA
in 2024***

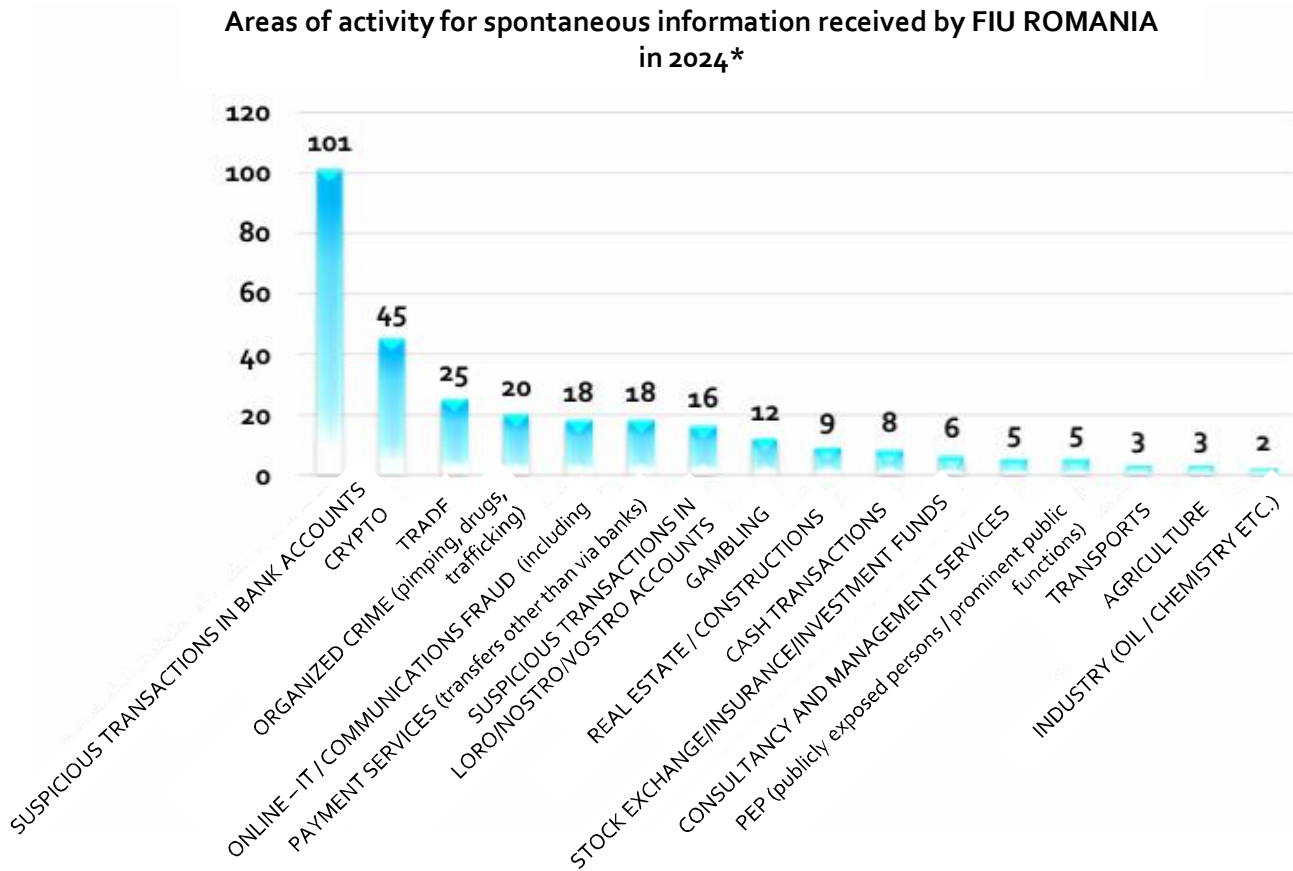


*This chart includes only the number of requests for which one/more than one of the areas in the statistical register could be identified, extracted from the total.

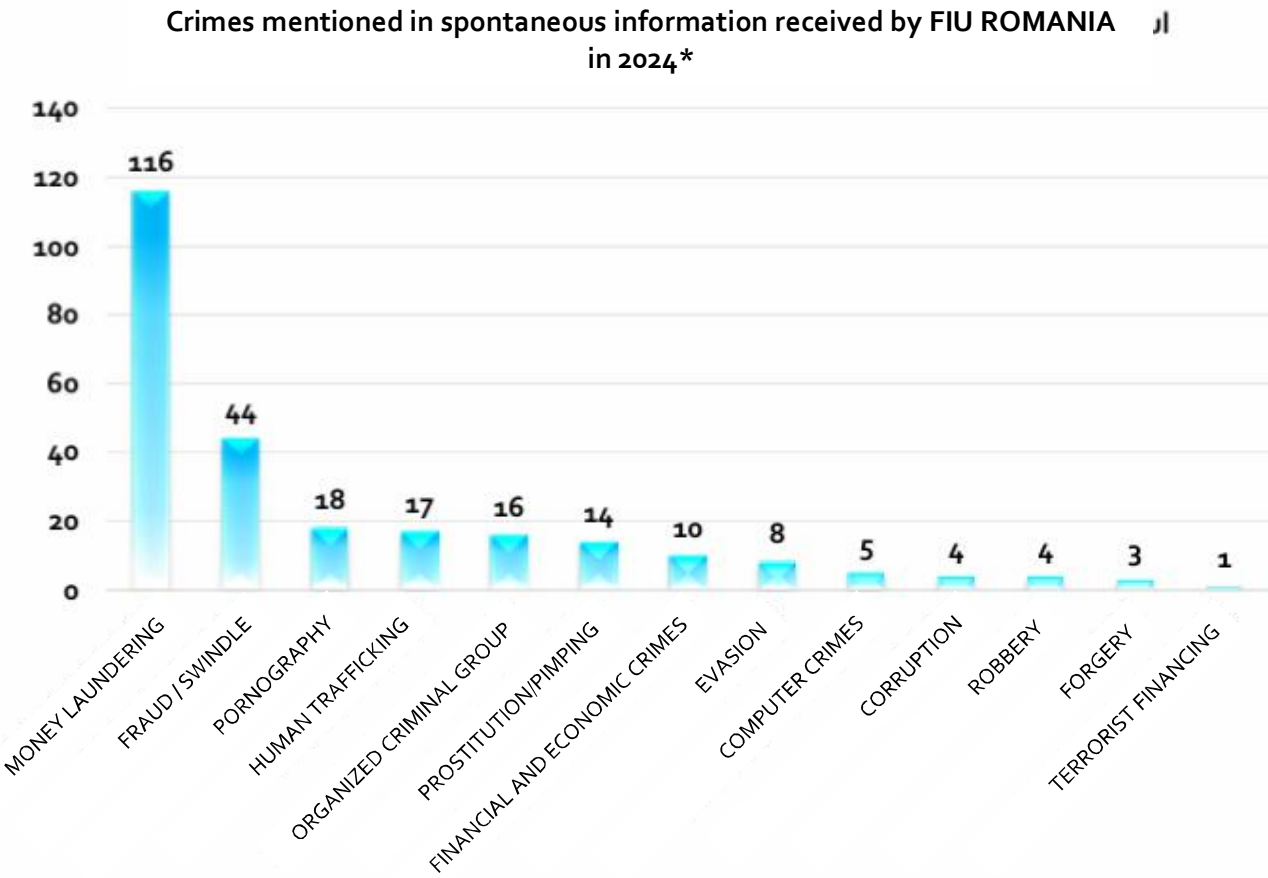


*This chart only includes the number of requests for which one/more than one of the crimes in the statistical register could be identified, extracted from the total.

The requests for information that indicated suspicions of terrorist financing were in fact related to suspicions of circumvention of the sanctioning regime adopted at the international level or the sanctioning regime adopted at the local level by the issuing countries.



*This chart includes only the number of information for which one/more than one of the areas foreseen in the statistical register could be identified, extracted from the total.

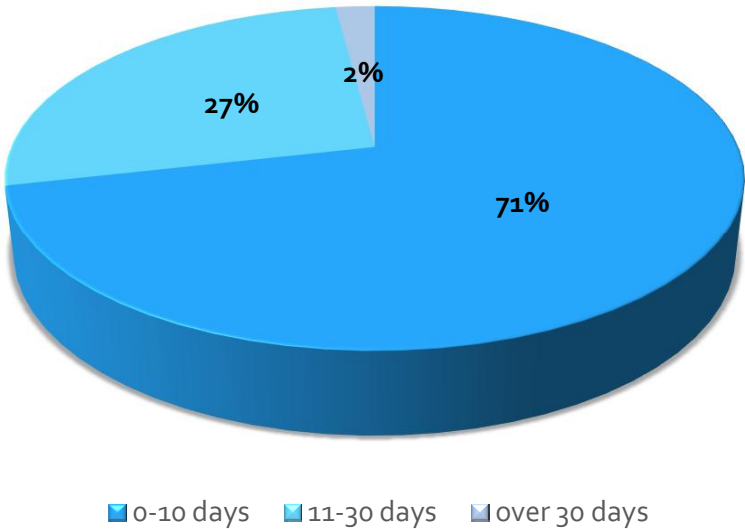


*This chart includes only the number of reports for which one/more than one of the domains foreseen in the statistical register could be identified, extracted from the total.

For the 196 requests for information received from the partner FIUs, the NOPCML sent the requested answers as follows:

- in 0 - 10 days for 140 enquiries;
- in 11 - 30 days for 52 requests for information;
- in over 30 days for 4 requests for information.

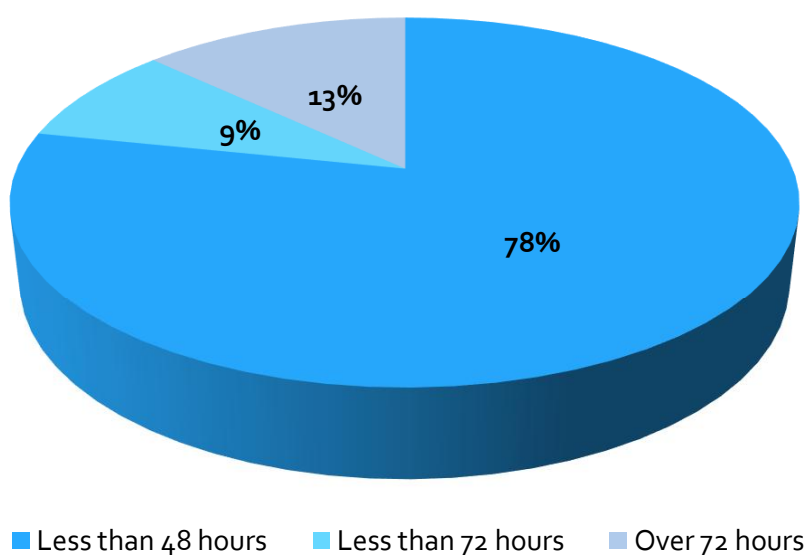
Deadline for responding to requests for information received by FIU ROMANIA in 2024



For the 23 requests for information marked "urgent" received in 2024, the ONPCSB forwarded responses to foreign financial intelligence units as follows:

- ❖ in less than 48 hours for 18 requests for information;
- ❖ in less than 72 hours for 2 requests for information;
- ❖ within more than 72 hours for 3 requests for information.

Deadline for responding to urgent requests for information received by FIU ROMANIA in 2024

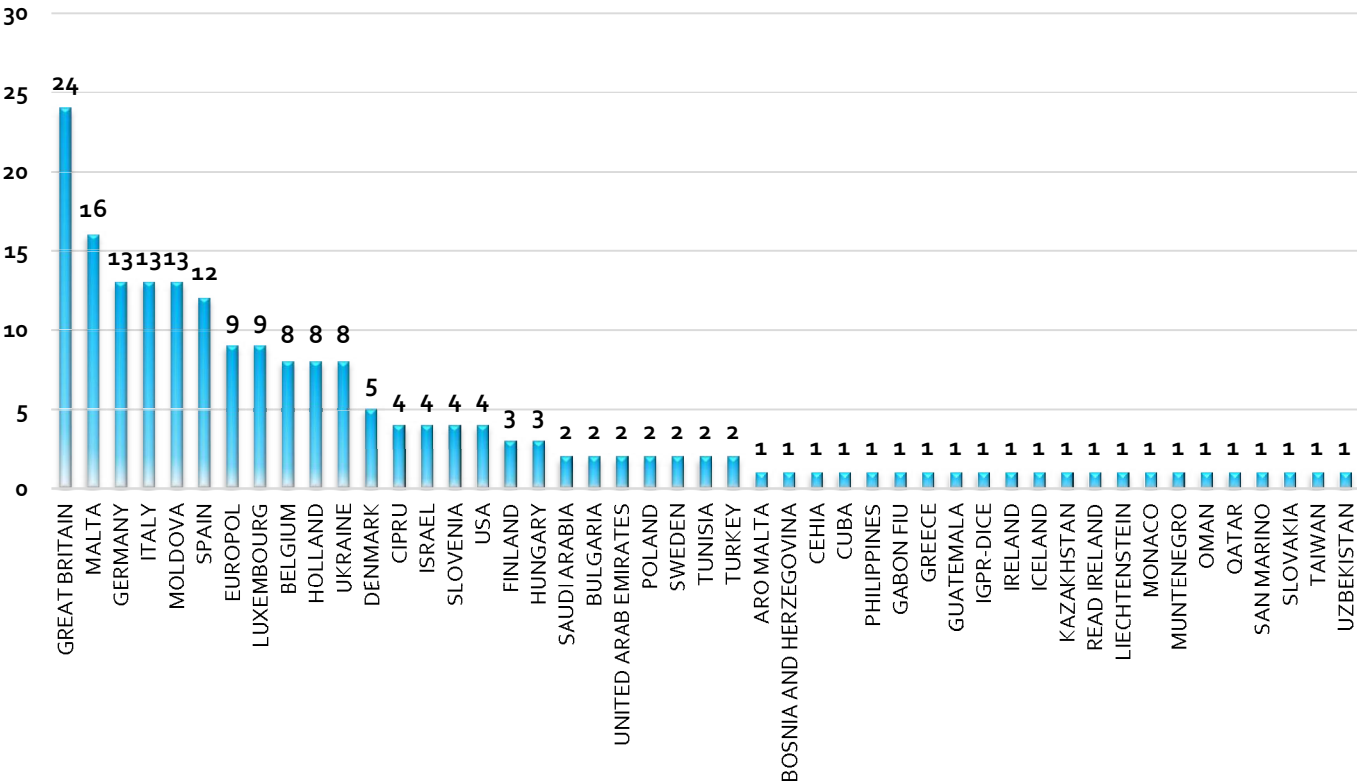


Geographically, in 2024:

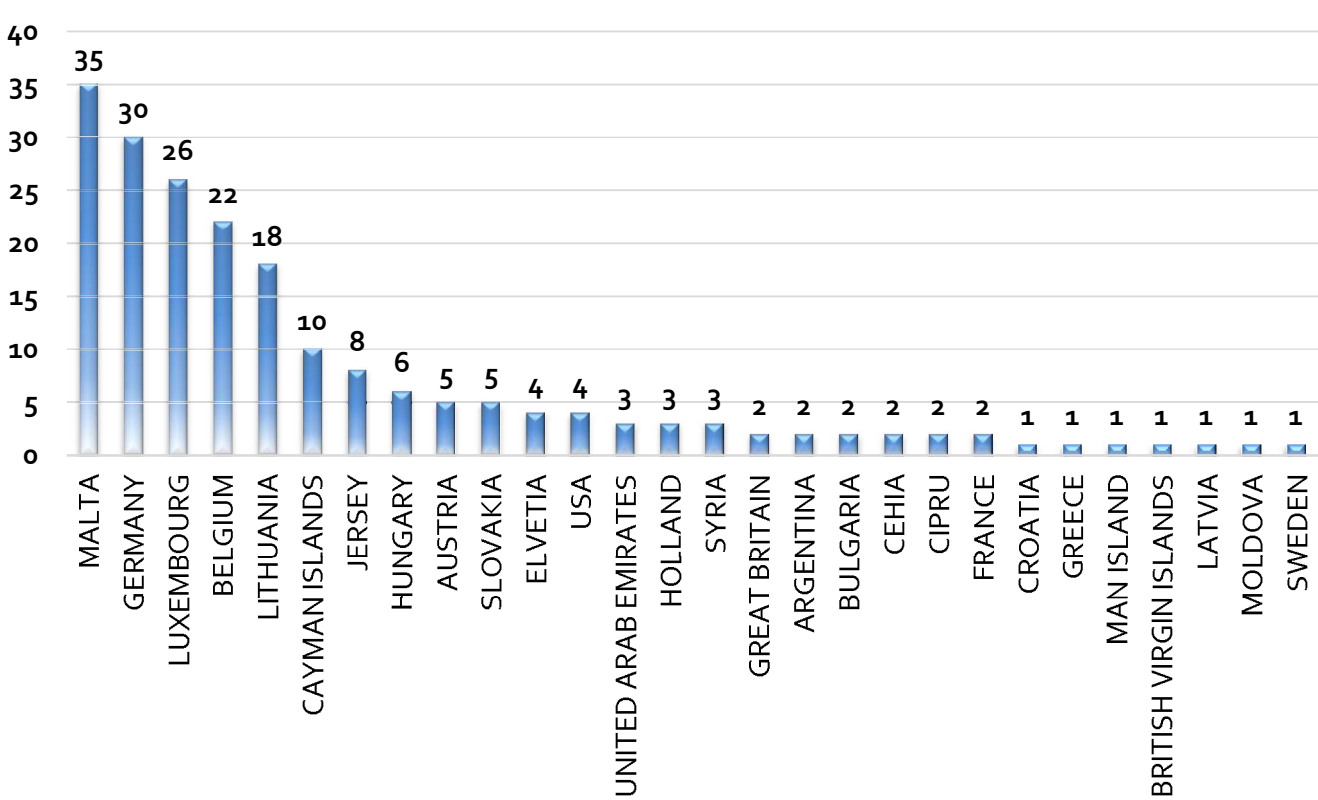
- ❖ FIU Romania received the most **requests for information** from the UK (24 requests), Malta (16 requests), Germany (13 requests), Italy (13 requests), Moldova (13 requests), Spain (12 requests), Luxembourg (9 requests), Belgium (8 requests), the Netherlands (8 requests), Ukraine (8 requests);
- ❖ FIU Romania has received the most **spontaneous information** from Malta (35 information), Germany (30 information), Luxembourg (26 information), Belgium (22 information), Lithuania (18 information).

In general, it can be noted that this geographical distribution of spontaneous information is justified by the presence of certain specific service providers on the territory of the respective countries, such as gambling/crypto providers for Malta and the presence of Revolut in the case of Lithuania.

States that have sent requests for information to FIU ROMANIA in 2024



States that have sent spontaneous information to FIU ROMANIA in 2024



From the total number of works received from external partners (196 requests for information and 201 spontaneous information) in 2024, following the specific activities of information exchange, ***on the basis and within the limits of the dissemination agreement expressed by the partner institutions***, the solutions adopted by the NOPCML, for the harnessing of information, at the proposal of ICRS, concerned:

- forwarding the information relevant to the specific activity of law enforcement authorities (GIRP, public prosecutor's offices, RIS), in accordance with the provisions of Article 34 para. (4) of Law 129/2019, for 49 works (6 requests for information and 43 spontaneous information),
- forwarding the information relevant for the specific activity of the competent authorities (NBR, FSA, NAFA), in accordance with the provisions of Article 34(4) of Law 129/2019, for 6 works (2 requests for information and 4 spontaneous information),
- forwarding the information to the competent structure (DAPI), to be harnessed according to the legal competences, for 86 cases (31 requests for information and 55 spontaneous information) in which it was found that there were links with other cases already in progress.

The provision of responses to the requests for information received from partner FIUs and Europol has also led to cooperation with other Romanian authorities involved in preventing and combating money laundering and terrorist financing: prosecution units, the Ministry of Justice, the Romanian Customs Authority, the National Authority for Citizenship, the General Inspectorate for Immigration, as well as the request for additional information from credit institutions or other obliged entities pursuant to Article 33 of Law 129/2019.

During 2024, attention was maintained on the geo-political context created by the military aggression of the Russian Federation against Ukraine and the establishment of multiple sanction regimes in connection with this issue. Thus, even the international exchange of information activity of the NOPCML was influenced by these developments, which is why a total of 8 requests for information were received from the Financial Intelligence Unit of Ukraine and 3 requests for information and one spontaneous information were sent to it.

In this context, we note that the NOPCML has promptly ensured, through SCISTF-ICRS, the publication of the regulatory acts on sanctioning measures imposed by the European Union and the UN Security Council.

Also, during 2024, 2 cases related to foreign persons suspected of financing terrorism in their home state were processed (by emergency dissemination to the RIS).

In the course of 2024, the NOPCML received from 2 partner financial intelligence units information on typologies of companies being used to launder money of illicit origin through clearing techniques and through SEPA Direct Debit Business-to-Business payment fraud mechanisms.

Finally, it should be noted that during 2024, 17 additional requests were processed in cases registered in previous years, of which 15 requests for previously received enquiries and 2 requests for spontaneous information previously received.

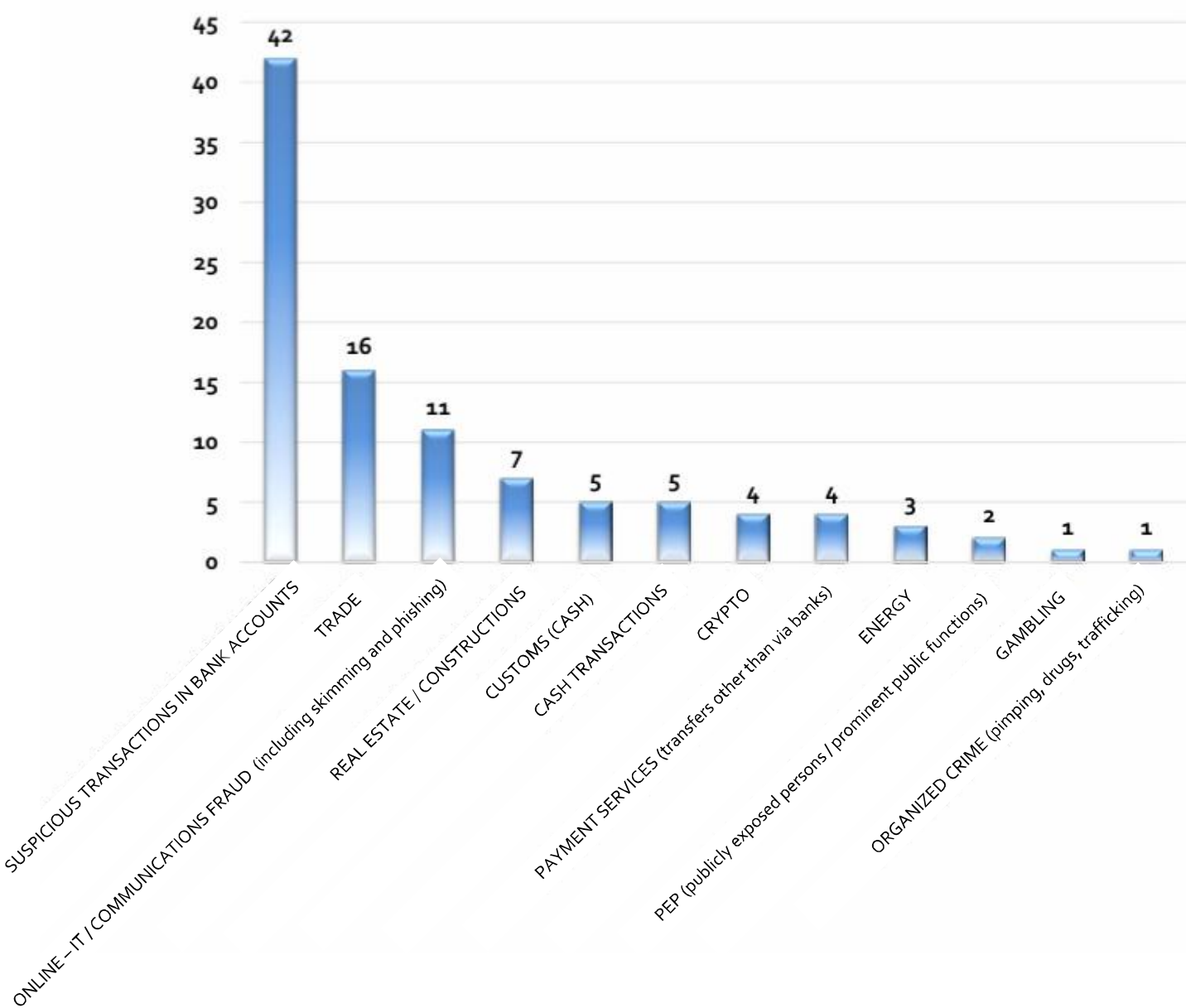
II. SPONTANEOUS INFORMATION AND REQUESTS FOR INFORMATION FROM THE NOPCML TO INSTITUTIONAL PARTNERS (FOREIGN FINANCIAL INTELLIGENCE UNITS AND EUROPOL)

In 2024, the Office sent a total of 74 requests for information via the two communication channels FIU.NET and ESW, of which 42 were urgent, but also 51 spontaneous information.

They targeted a total of 259 individuals and 290 legal entities, of which:

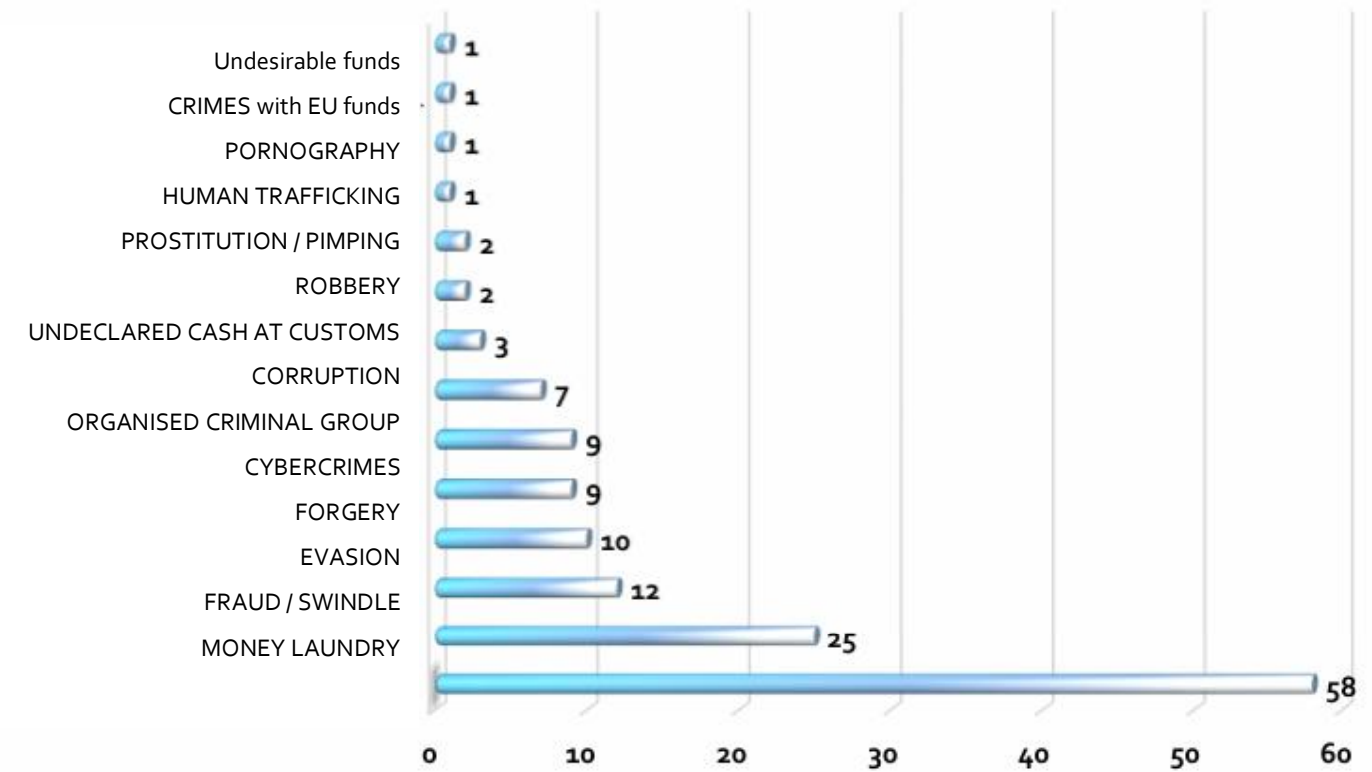
- for requests for information - 220 natural persons and 175 legal entities;
- for spontaneous information - 39 natural persons and 115 legal entities.

Areas of activity for requests for information sent by FIU ROMANIA in 2024*



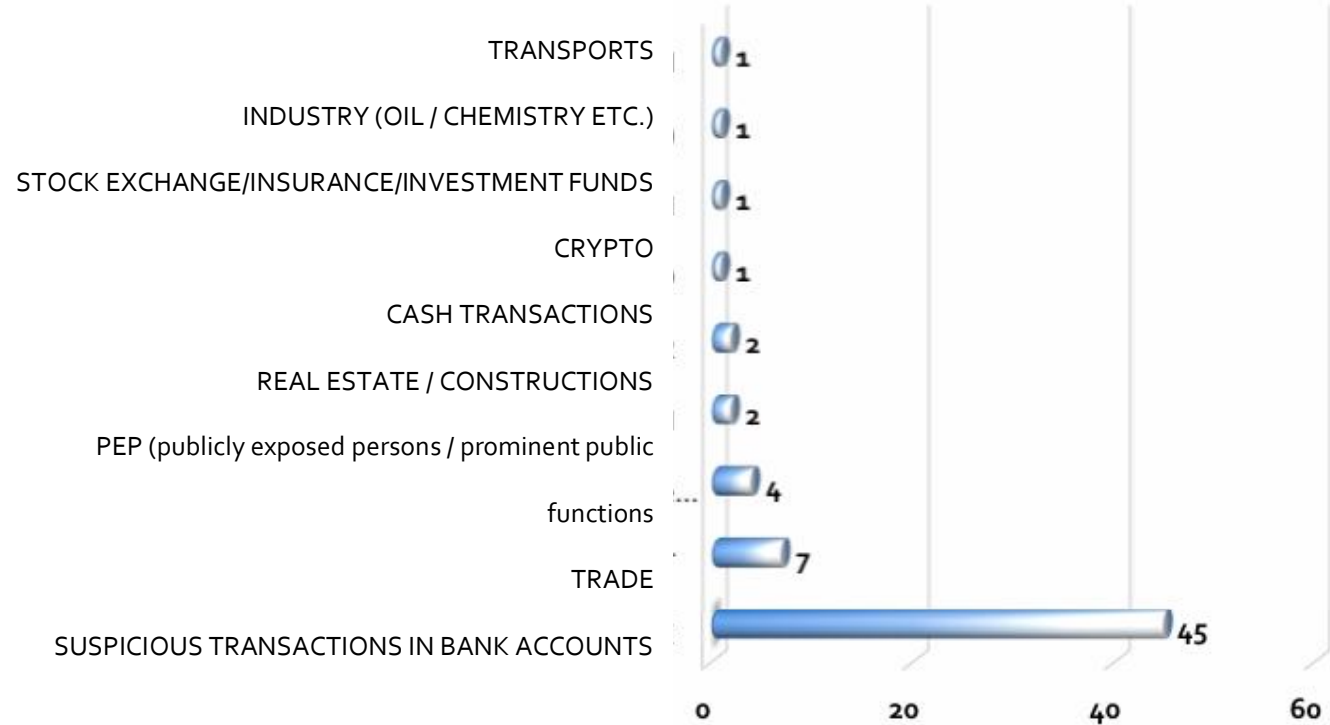
*This chart includes only the number of applications for which one/more than one of the areas in the statistical register could be identified, extracted from the total.

Crimes mentioned in requests for information sent by FIU ROMANIA
in 2024*

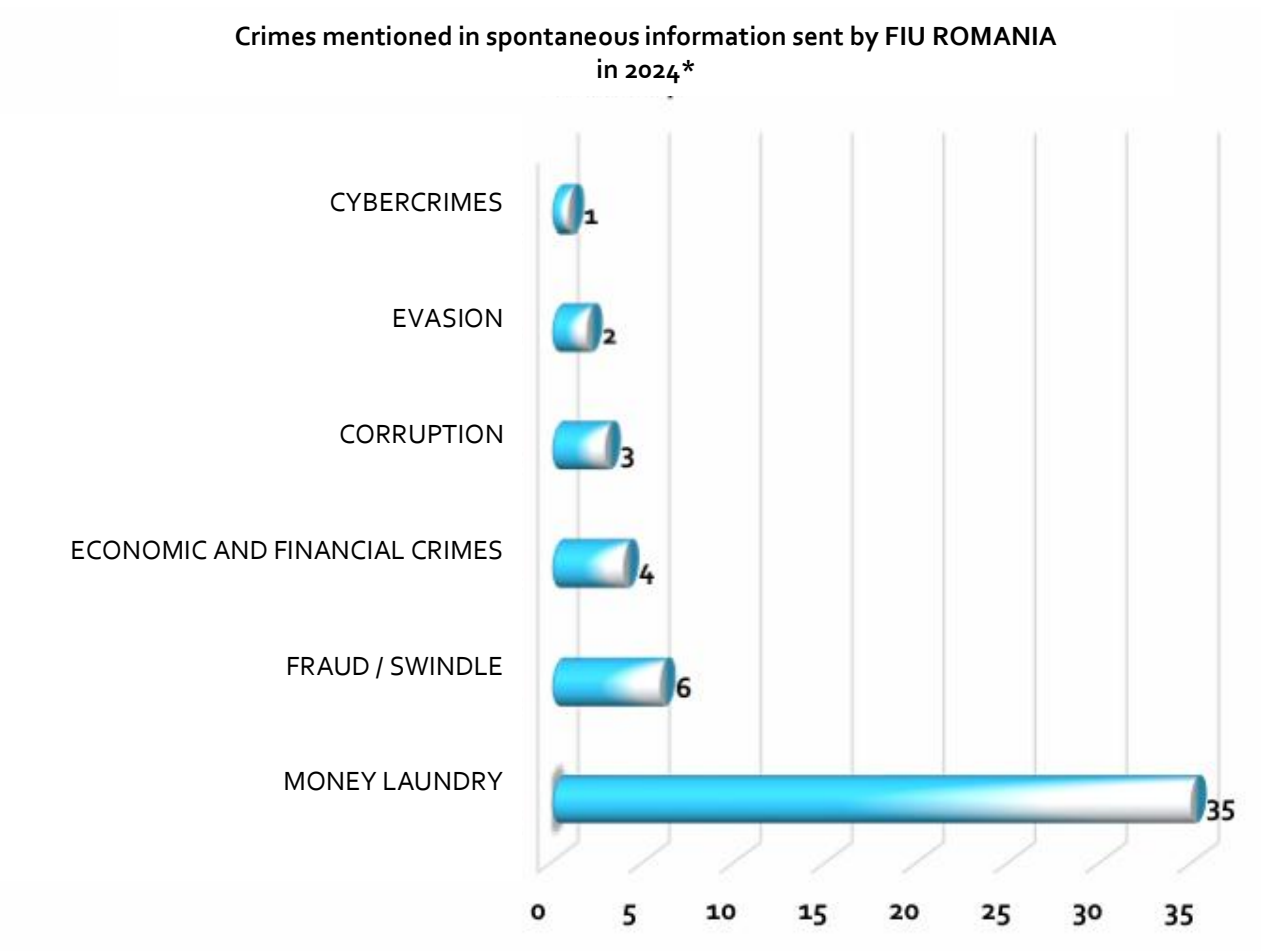


*This chart shows only the number of requests for which one/more than one of the crimes listed in the statistical register could be identified, extracted from the total.

Areas of activity for spontaneous information sent by FIU ROMANIA
in 2024*

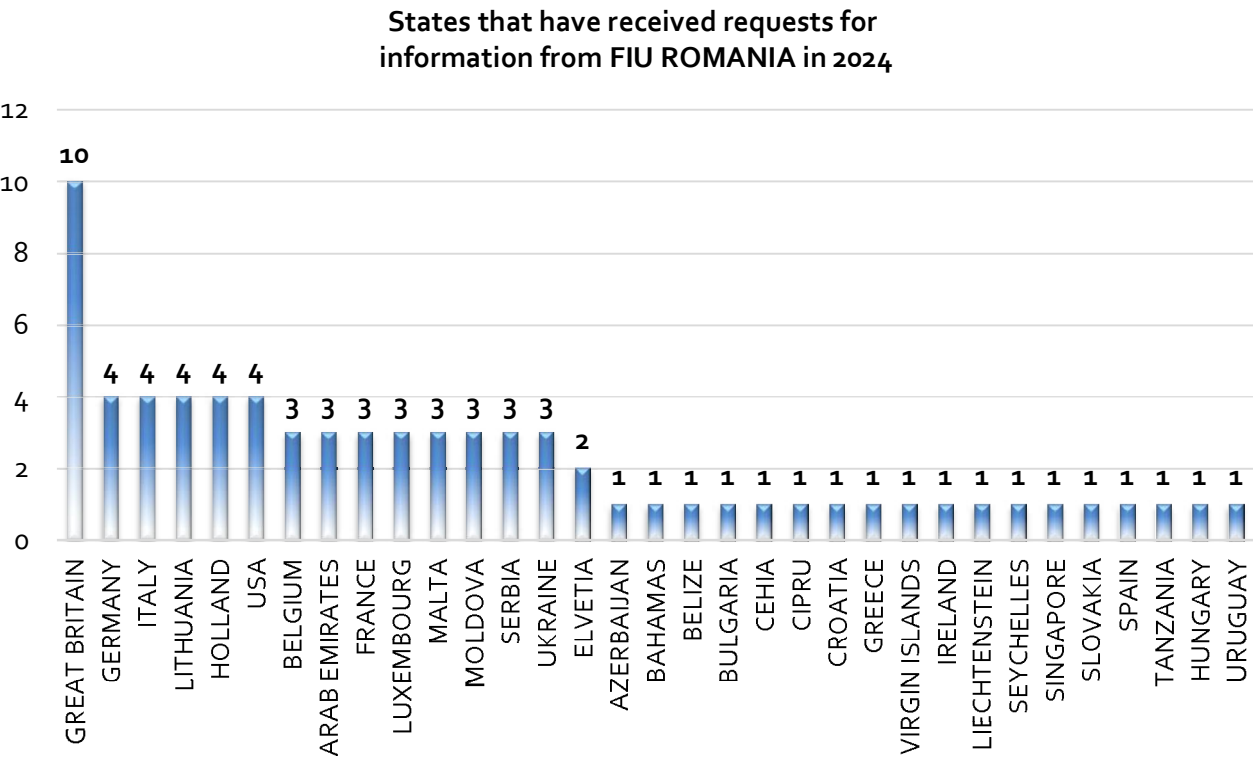


*This chart includes only the number of information for which one/more than one of the areas foreseen in the statistical register could be identified, extracted from the total.

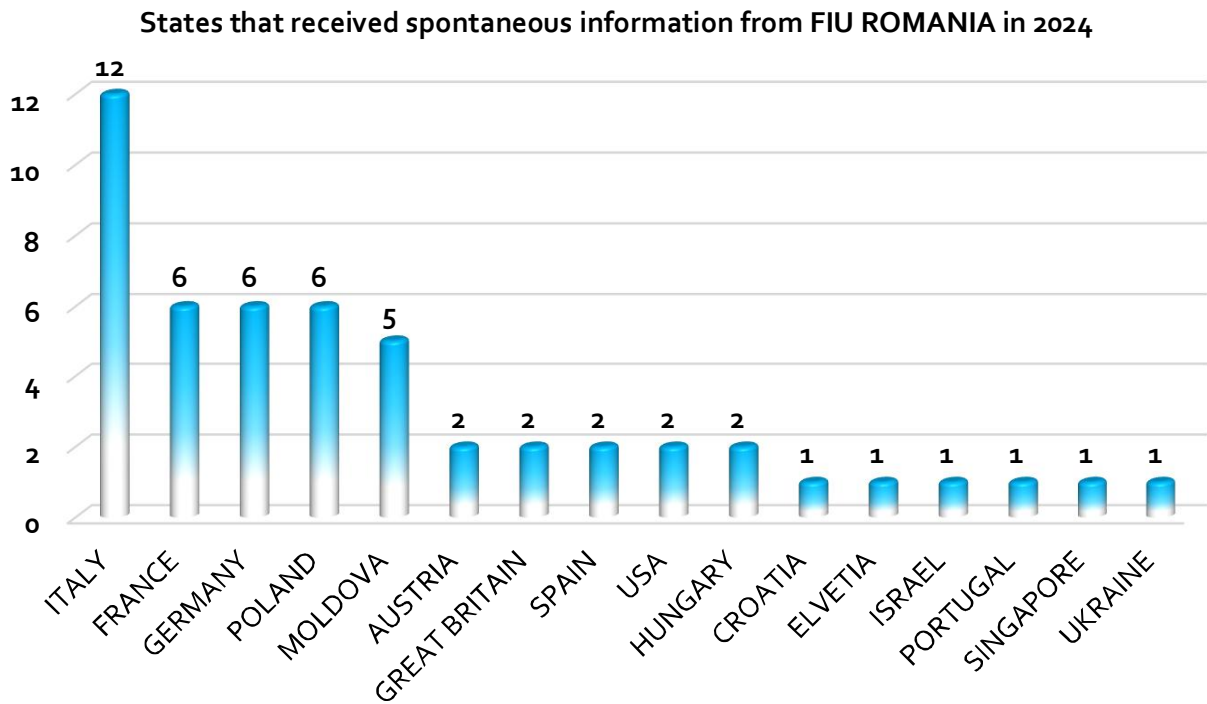


*This chart includes only the number of information for which one/more than one of the crimes listed in the statistical register could be identified, extracted from the total.

- The countries to which FIU Romania sent the most requests for information during 2024 were:
- ❖ United Kingdom - 10 applications;
 - ❖ Germany, Italy, Lithuania, Lithuania, the Netherlands and the USA - with 4 applications each.



The states to which FIU Romania sent, during 2024, the most spontaneous information were: Italy (12 information), France, Germany and Poland (with 6 information each), Moldova (5 information).



Lastly, it should be noted that during 2024, 9 additional requests were received and forwarded for requests for information submitted in previous years by the NOPCML.

III. FEEDBACK RECEIVED FOR THE INTERNATIONAL INFORMATION EXCHANGE ACTIVITY FROM PARTNER INSTITUTIONS

In accordance with the provisions of the operational procedure governing the information exchange activity at the level of the NOPCML and considering the need for continuous improvement of the international information exchange activity, the partner FIUs were asked to evaluate the collaboration with FIU Romania during 2024, giving a rating from 1 (very poor) to 5 (excellent), and 97% of the ratings received were "excellent" and "very good", as well as to make general comments/recommendations on the quality of assistance provided by FIU Romania - NOPCML.

The most appreciated aspect of the international exchange of information was the timeliness of responses, where the response time to requests for information was considered excellent in 76% of cases and very good in 18% of cases.

FIU Romania's co-operation was equally appreciated, where 100% of the partner FIUs providing feedback rated the co-operation provided by FIU Romania as excellent or very good.

100% of the partner FIU's that provided feedback on the completeness of the answers provided by FIU Romania rated the responses as "excellent" or "very good".

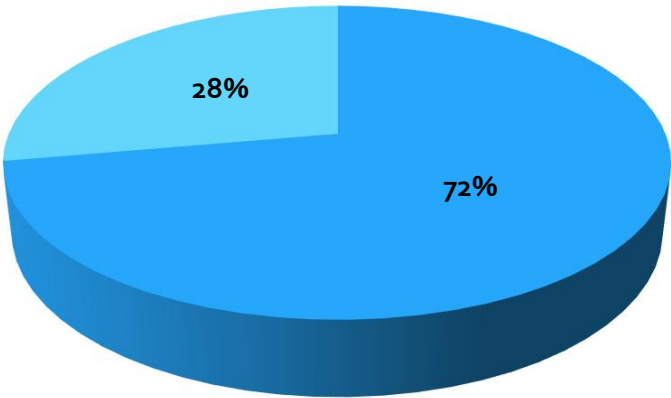
One FIU stated that the information provided by FIU Romania made it possible to identify links between persons and entities in the cases they analysed. The data provided by FIU Romania also confirmed their information on the involvement of subjects in trafficking in human beings and sexual offences, and most of the foreign partner institutions expressed their thanks for the quality and promptness of the assistance provided by FIU Romania - NOPCML.

94% of the responding FIU's consider the answers provided by the Office to their requests for information to be very useful or excellent for their analysis/ law enforcement investigations. One respondent considers the information provided to be good and no respondent considers the information useless for their own analysis or law enforcement investigations.

62% of the responding FIUs stated that the data received from FIU Romania during 2024 confirmed information already known to them, while 38% stated that the information received was unknown to them.

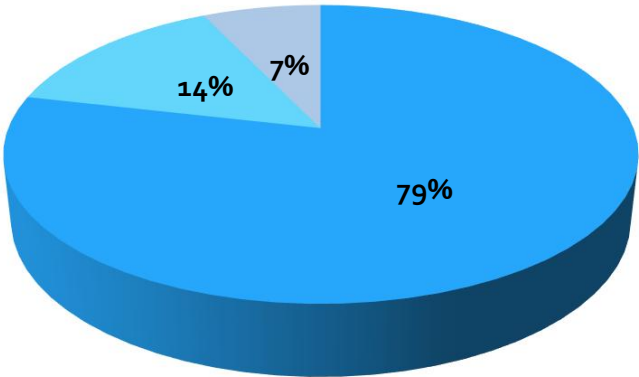
**FEEDBACK FROM PARTNER FINANCIAL INTELLIGENCE UNITS ON INTERNATIONAL
INFORMATION EXCHANGE IN 2024**
- GRAPHIC REPRESENTATION -

**Overall satisfaction with the co-operation
offered by FIU Romania**



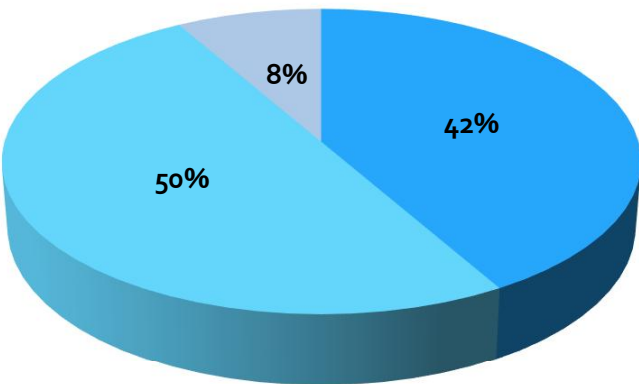
■ Excellent ■ Very good ■ Good ■ Poor ■ Very poor

**Quality of requests for information sent
by the Office**



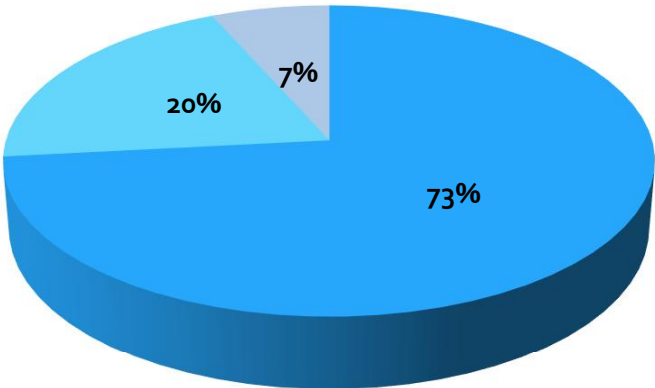
■ Excellent ■ Very good ■ Good ■ Poor ■ Very poor

**Usefulness and quality of spontaneous
disseminations transmitted by the Office**



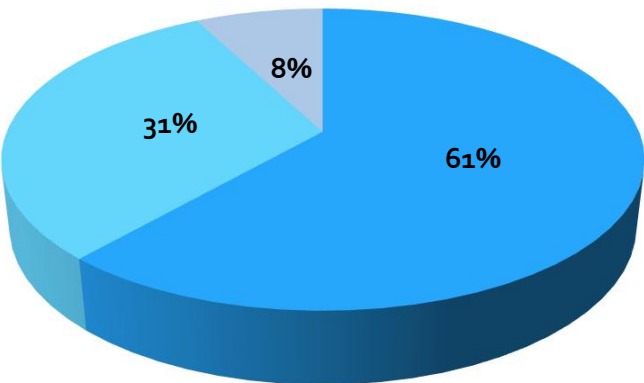
■ Excellent ■ Very good ■ Good ■ Poor ■ Very poor

**Quality of information provided in our
responses**



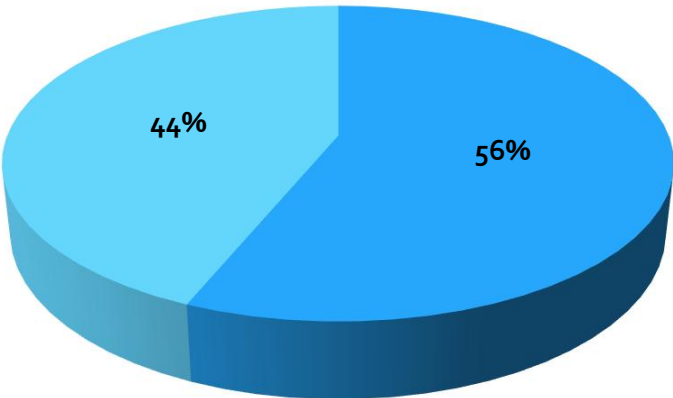
■ Excellent ■ Very good ■ Good ■ Poor ■ Very poor

Quality and completeness of the information provided on the beneficial owner



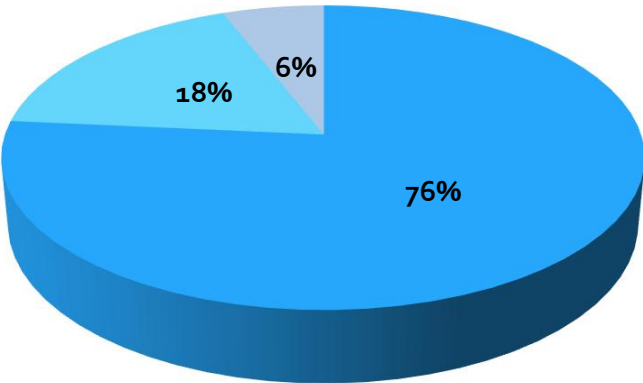
■ Excellent ■ Very good ■ Good ■ Poor ■ Very poor

The comprehensiveness of our answers



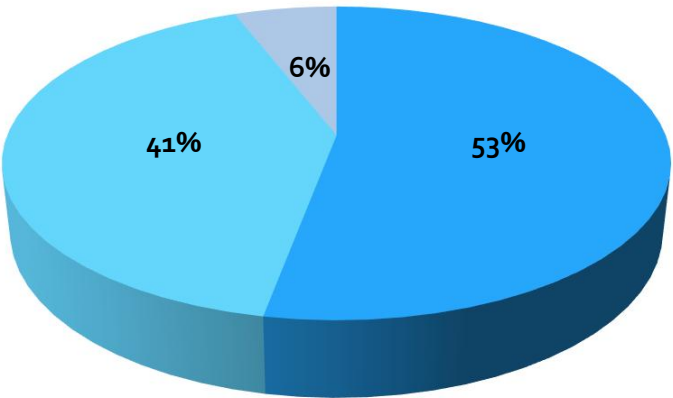
■ Excellent ■ Very good ■ Good ■ Poor ■ Very poor

The operability of our answers



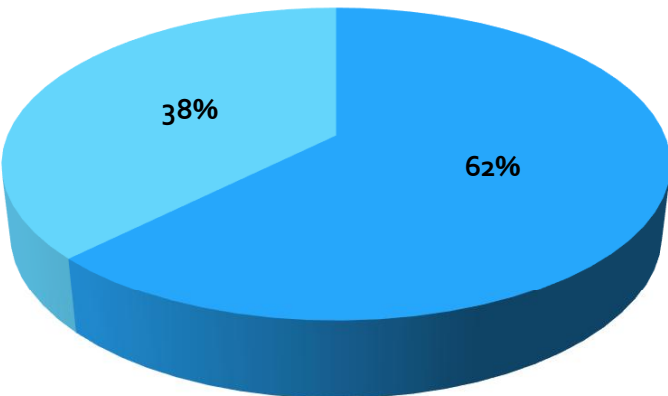
■ Excellent ■ Very good ■ Good ■ Poor ■ Very poor

Usefulness of the information provided in our responses for the analysis of partner FIUs/ partner country law enforcement investigation



■ Excellent ■ Very good ■ Good ■ Poor ■ Very poor

The information provided confirmed data already known to the partner FIU



■ YES ■ NO

EUROPEAN AFFAIRS ACTIVITY AND INTERNATIONAL RELATIONS

The European Affairs and Inter-Institutional Cooperation Service (SAECI) of Directorate of Cooperation, International Sanctions and Terrorist Financing (DCSIFT) - Directorate General for Cooperation and Internal Services (DGCSI) manages the internal and external relations of the NOPCML, ensuring cooperation with the competent authorities within the national system for preventing and combating money laundering and terrorist financing, in accordance with the legal provisions in force, as well as coordinating activities related to European affairs, with a view to Romania's participation in the decision-making process of the European Union institutions.

Accordingly, the Office, through SAECI, ensures Romania's representation and co-operation with the following European and international fora in the field of combating money laundering and terrorist financing (AML/CFT), as well as the implementation of international sanctions:

❖ European Commission

- EU FIU Platform and FIU Advisory Group

The EU FIU Platform, set up by the European Commission and made up of the Financial Intelligence Units of the Member States, provides advice and expertise to the Commission on operational issues in the context of the functions performed by FIUs.



It also aims to facilitate cooperation between national financial intelligence units as well as exchanges of views on cooperation issues such as effective international cooperation of FIUs, identification of suspicious transactions with a cross-border dimension, standardisation of reporting formats through FIU.net or its successor and joint analysis of cross-border cases, and trends and factors relevant to the assessment of money laundering and terrorist financing risks, both at national and supranational level. The activities of the FIU Platform are aimed at strengthening the capacity for cooperation at European level in the area of combating money laundering and terrorist financing, the ways of exchanging information, the communication channels used and the sharing of best practices in this field.

The NOPCML representatives attended all the Platform meetings organised in 2024, as follows: online, on 13 March 2024 and 27 September 2024, and in physical format, in Brussels, Belgium, from 20-21 June 2024 and on 5 December 2024.

During these meetings the following main topics were discussed:

- ✓ Presentation of the new EU AML/CFT legislative package;
- ✓ Establishing the EU Anti-Money Laundering Authority (AMLA);
- ✓ Information on the development of the next-generation FIU.net application and the work of the Change Management Board;
- ✓ Update on the implementation of the EU FIU Platform work plan 2022-2024.

In 2024, the major concern of the EU FIU Platform and the Advisory Group was the **preparation and production launch of the new FIU.NET NG (Next Generation) system**, the main secure network for the international exchange of financial information between financial intelligence units in the EU Member States.

- Expert Group on Money Laundering and Terrorist Financing - EGMLTF

The EGMLTF is a permanent expert group of the Commission with the task of assisting the European Commission in the preparation of legislative proposals and policy initiatives, ensuring coordination and exchange of views between Member States in order to implement EU legislation in the area of preventing and combating money laundering and providing expertise to the European Commission on implementing measures.

In 2024, Office staff attended the 3 EGMLTF meetings, which were held in videoconference format on 8 February 2024, 13 June 2024 and 14 October 2024.

Topics discussed at the EGMLTF working sessions include:

- ✓ Realisation of the 4th edition of the Supranational Risk Assessment (SNRA);
- ✓ Creation of the EGMLTF's dedicated non-financial sector sub-group (NFSS);
- ✓ Establishment of the AMLA General Council;
- ✓ Study on technical and IT solutions for interconnecting centralised registers of bank accounts.

• CPMLTF - Committee for the Prevention and Combating of Money Laundering and Terrorist Financing (BORIS - beneficial owners register interconnection)

This Committee, made up of designated representatives of the Member States as well as a number of observers, has the role of assisting the Commission in the development of AML/CFT policy.

The topics addressed during the 4 meetings of the CPMLTF, organised in online format on 22 February 2024, 26 September 2024 and 28 November 2024, as well as in physical format in Brussels, Belgium, on 11 April 2024, were:

- ✓ State of interconnection of national central registers of beneficial owners (BOs) in the Member States;
- ✓ Finalisation of BORIS v.2 and partial implementation of BORIS v.3.

• Expert group on EU sanctions and extraterritoriality

The NOPCML, as a member of the Inter-Institutional Council for the Implementation of International Sanctions (ICIIS), has been invited to participate in the meetings of this group, which was established in 2021. The Group acts at the request of the European Commission's Directorate-General for Financial Stability, Financial Services and Capital Markets Union (DG FISMA).

In 2024, the Office took part in the discussions of this expert group by participating in online meetings on 8 April 2024 and 19 November 2024.

❖ European Banking Authority (EBA)

• Anti-Money Laundering Standing Committee (AMLSC)

The Anti-Money Laundering and Combating the Financing of Terrorism Standing Committee (AMLSC) is an internal standing committee of the EBA. It was established in accordance with the requirements laid down in Article 9a of Regulation (EU) 2019/2175 of the European Parliament and of the Council.

The main objective of the AMLSC is to coordinate efforts aimed at preventing and combating the illicit use of the financial system for money laundering and terrorist financing within the EU. In addition, in the context of Directive 2015/849/EU (AMLD) and Regulation 2015/847/EU (Wire Transfers Regulation), the AMLSC is responsible for the preparation of all draft decisions to be taken by the EBA's Supervisory Board on the Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT).

The AMLSC is composed of representatives of national authorities with supervisory responsibilities in the field of AML/CFT. One competent authority from each Member State has voting rights (27 in total), while the others are non-voting members (30 in total).

The Committee also includes observers from different organisations such as the European Insurance and Occupational Pensions Authority (EIOPA), the European Securities and Markets Authority (ESMA), the Supervisory Board of the Single Supervisory Mechanism (ECB), the European Commission (EC), the European Economic Area countries of the European Free Trade Association (EFTA), represented on the EBA Board of Supervisors, and the EFTA Surveillance Authority (ESA).

The Romanian institutions involved in the activities of this Committee are the National Office for Prevention and Control of Money Laundering, the National Bank of Romania and the Financial Supervisory Authority.

The NOPCML representatives attended all AMLSC meetings in 2024, organised either online (02.02.2024, 19.06.2024 - 20.06.2024) or in person at the EBA headquarters in Paris, France (12.03.2024 - 13.03.2024, 26.09.2024 - 27.09.2024, 20.11.2024 - 21.11.2024).

❖ Council of Europe • Moneyval Committee

The Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism - MONEYVAL (formerly PC-R-EV), established in 1997 as a delegated body of the FATF (Financial Action Task Force), aims to ensure that the CoE Member States under its competence for evaluation have efficient and effective systems to prevent and combat money laundering and terrorist financing in accordance with the relevant international standards in this field.



Romania became a member of the Moneyval Committee in 1999, following the adoption of the first regulatory act in the field of preventing and combating money laundering, Law no. 21/1999, which established the National Office for Prevention and Control of Money Laundering, competent authority and national coordinator in the field of reference and national representative in the relations with the European Commission and the Moneyval Committee of Experts.

In view of the commitments undertaken at the Warsaw Meeting in April 2023, where the Ministers of Finance of the Moneyval Member States, including Romania, adopted the *High-Level Political Declaration and Strategy of the Moneyval Committee for the period 2023-2027*, in which the representatives of the member states reiterated their firm political commitment to take all necessary measures to combat the criminal phenomena related to money laundering and terrorist financing, SAECI prepared and promoted, in 2024, the draft Government Decision on the payment of a voluntary financial contribution by Romania to the budget of the Council of Europe's MONEYVAL Committee, which was subsequently approved by the Government by adopting GD No. 562 of 23 May 2024 and which was aimed at granting financial support to the Moneyval Committee for the performance of specific activities.

The National Office for Prevention and Control of Money Laundering was involved in the activities of the Council of Europe's Moneyval Committee in 2024, in particular by participating in the Moneyval Expert Group Meetings, as well as in the 67th and 68th Plenary Meetings of the Moneyval Committee, which took place in May and December 2024, respectively, in Strasbourg, France.

The national system for preventing and combating money laundering and terrorist financing (AML/CFT) has undergone successive rounds of evaluation by the Moneyval Committee of the Council of Europe, which have led to legislative, institutional and efficiency improvements in the functioning of the system.

In this context, the latest Mutual Evaluation Report of Romania by the Moneyval Committee was adopted in May 2023, on which occasion the Moneyval Plenary Meeting decided, based on the qualifications obtained, to place our country in the monitoring process and decided that the first Progress Report will be presented at the plenary meeting in June 2025.

In order to prepare the first Progress Report, the Office coordinated at national level the drafting of the document and ensured its submission to the Moneyval Secretariat in December 2024, in accordance with Rule 21 of the Moneyval Rules of Procedure. Taking into account the legislative developments at European level, namely the entry into force of Regulation (EU) 2023/1113 of the European Parliament and of the Council on information accompanying transfers of funds and certain cryptoassets and amending Directive (EU) 2015/849, Regulation (EU) 2023/1114 of the European Parliament and of the Council on cryptoasset markets and amending Regulations (EU) No. 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937 and at the international level, United Nations Security Council Resolution (UNSCR) 2744 (2024), adopted on 19 July 2024, Romania has requested the revision of the ratings for the following FATF recommendations:

- ❖ Recommendation 6 "Targeted financial sanctions related to the financing of terrorism and terrorist acts";
- ❖ Recommendation 7 "Proliferation-specific financial sanctions";
- ❖ Recommendation 15 "New technologies" (virtual asset service providers);
- ❖ Recommendation 33 "Statistics".

In order to remedy the shortcomings identified by Moneyval expert evaluators in the Mutual Evaluation Report of Romania, in 2024 the Office drafted and promoted on the legislative approval circuit the draft amendment and supplement to Law no. 129/2019 on combating money laundering and terrorist financing, necessary to ensure the technical compliance of the national legal framework with the standards imposed by FATF, approved in the Government meeting of 18.12.2024 and subsequently submitted to the Senate, under the urgent procedure, for debate and adoption, as the first chamber to be seised.

At the 67th Plenary of the Council of Europe's Moneyval Committee in May 2024, Romania was appointed as rapporteur for the first Monaco Expedited Monitoring Report, with the task of assessing the progress reported by this country in implementing FATF/GAFI Recommendations 24 and 25, which deal with transparency and beneficial owners of legal persons and legal arrangements, respectively. In this context, SAECI personnel, together with the Moneyval Secretariat, carried out the process of analysing Monaco's progress in implementing the Recommendations and eliminating the deficiencies noted in Monaco's Mutual Evaluation Report on the two FATF Recommendations.

At the same time, the 68th Moneyval Plenary Meeting in December 2024 agreed that Romania will act as a reporting country for *Recommendation 16 - Bank Transfers, Recommendation 18 - Domestic Controls and Foreign Branches and Subsidiaries, Recommendation 25 - Transparency and Beneficial Ownership of Legal Arrangements* and *Recommendation 26 - Regulation and Supervision of Financial Institutions* of the first Expedited Monitoring Report of Northern Macedonia.

Therefore, in 2025, the designated DCSIFT personnel will review, in co-operation with the Moneyval Secretariat, the progress made by the assessed country in implementing the recommendations and addressing the shortcomings identified by the Moneyval team of experts in the Mutual Evaluation Report of Northern Macedonia in relation to the four FATF recommendations.

In 2024, a financial analyst from DCSIFT also became a FATF expert assessor following the completion of the Joint Assessor Training (JAT) course organised by the FATF from 02.12.2024 to 06.12.2024 in Thun, Switzerland.

❖ **Egmont Group - Global Network of Financial Intelligence Units**

The Egmont Group is an international organisation that brings together Financial Intelligence Units (FIUs) from around the world, with the main purpose of facilitating cooperation and information exchange in the fight against money laundering (AML) and the financing of terrorism (CFT). The Group was founded in 1995 at the Egmont Palace in Brussels, Belgium, by an initial group of 14 FIUs, and has since grown significantly to 177 members.



Egmont operates as a platform for global co-operation, providing a secure and efficient framework for exchanging financial intelligence, developing the operational capabilities of FIUs and setting common standards to combat financial crime. The Egmont Group's actions aim to improve the system for preventing and combating money laundering and the financing of terrorism (AML/CFT) worldwide.

The main tool used to achieve this objective is the secure information exchange platform made available to member FIUs. The Egmont Group consistently supports its members in the implementation of international standards and regulations by providing a common forum for dialogue, issuing documents to guide international cooperation between FIUs and through the projects it coordinates.

The purpose of the Egmont Group is to facilitate the exchange of information between FIUs through a secure channel, ensuring confidentiality and data protection, to establish standards and procedures for the efficient exchange of financial information, to provide technical support and training to strengthen the capacity of member FIUs, to promote international cooperation through collaboration with organisations such as FATF (Financial Action Task Force), the UN, Europol, Interpol, OLAF, the IMF and the World Bank, monitoring members' compliance with Egmont principles and standards, supporting the development of emerging FIUs and facilitating their accession to Egmont, and improving the use of IT technologies in analysing and exchanging information on money laundering and terrorist financing.

Within this group operates a Steering Committee, 9 Regional Egmont Groups and 4 Working Groups, namely: the Information Exchange ML/FT Working Group (IEWG), the Egmont Membership and Compliance Working Group (MSCWG), the Policy and Procedure Development Working Group (PPWG), the Technical Assistance and Training Delivery Working Group (TATWG).

The National Office for Prevention and Control of Money Laundering - FIU Romania became a member of the Egmont Group in May 2000, and the management of the Office signed the Declarations of reiteration of the commitment of FIU Romania to continue to operate as a member of the Egmont Group in 2008 and 2013, the dates on which the constitutive documents of this organisation were updated.

The permanent involvement of the Office in the activities of the Egmont Group has been one of the main objectives at international level. FIU Romania has focused on a qualitative exchange of information through the secure communication network provided by the Egmont Group - ESW (globally, between member FIUs). The requests for information sent by the Office to other FIUs aimed at obtaining additional information to support the financial analyses and to complete the financial circuit of the funds subject to money laundering.

The Romanian Financial Intelligence Unit has been included, since 2014, in the Egmont Europe I Region, together with the FIUs of Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Slovakia, Slovenia, Spain, Sweden, United Kingdom and the Czech Republic. The Office's presence in Region I has been aimed at ensuring a prolific dialogue with institutions with similar tasks in the European Union/European Economic Community, in order to identify best practices in the exchange of information and the conduct of operational and strategic analyses related to this region.

Main Egmont working groups:

The Information Exchange Working Group (IEWG) focuses on improving the quality of international exchange of financial information between FIUs, develops technical and legal tools to facilitate international collaboration, examines difficulties that hinder the efficient exchange of information and proposes solutions to eliminate them.

The main objective of the **Membership, Support and Compliance Working Group (MSCWG)** is to manage the adherence and compliance of FIUs to the Egmont Standards. It assesses FIUs wishing to become members of the Egmont Group, monitors existing members' compliance with the Egmont rules and provides support to FIUs experiencing difficulties in meeting the co-operation requirements. The work of this working group is important as it ensures that member FIUs operate in accordance with the Egmont principles and maintains high standards of co-operation and transparency.

The Policy and Procedures Working Group (PPWG) is responsible for developing and updating the Egmont Group's policies and procedures. In fulfilling this purpose, the PPWG sets standards for the functioning and co-operation of the FIUs, creates guidelines for the alignment of FIU activities with international regulations and proposes amendments to the Egmont Group's legal and procedural framework. The work of the PPWG is important as it ensures the consistency and efficiency of operating rules and facilitates global collaboration.

The Training and Technical Assistance and Training Delivery Working Group (TATWG) provides technical assistance and training to FIUs by organising training sessions on financial analysis, money laundering and terrorist financing, developing educational materials and mentoring programmes, and supporting FIUs in implementing modern technologies to combat financial crime. The work of this working group is important as it contributes to the development of the FIUs' operational capabilities and to the enhancement of expertise in the field of financial analysis.

At TATWG level, the ECOFEL Project (Egmont Centre for FIU Excellence and Leadership), a programme created by the Egmont Group to support Financial Intelligence Units (FIUs) in developing their operational and strategic capabilities, was established. It functions as a training and technical assistance platform for FIUs, with the aim of increasing their effectiveness in combating money laundering (AML) and the financing of terrorism (CFT). ECOFEL's main objectives are to provide training and professional development for FIU staff, offer technical and operational support to FIUs, particularly those facing challenges in implementing international standards, develop educational materials and resources to improve financial analysis and international co-operation, promote best practices in the field of suspicious transaction investigation and information sharing, and strengthen FIUs' leadership capabilities to enable them to effectively manage emerging threats in the area of financial crime.

Egmont meetings are organised on a regular basis, twice a year, and are attended by representatives from member FIUs, in line with the Egmont Committee's request to ensure continuity of presence in these working groups. Given the need for the active participation of each Egmont member in the projects and decisions taken at these meetings, the continued presence of the Office, through its representatives, has been prioritised.

Therefore, in 2024, the Office participated in the EGMONT Working Groups Meeting held in Malta from 29 January to 02 February 2024, as well as in the 30th EGMONT Plenary held in Paris, France from 02 June 2024 to 07 June 2024.

Among the topical issues that were addressed during these meetings were: the implementation of the new European legislative package on combating money laundering and terrorist financing, the organisation and functioning of the European Anti-Money Laundering Authority (AMLA), techniques for recruiting quality staff within FIUs, techniques for the use of new technologies by FIUs, as well as the role of FIUs in addressing new emerging types of crime.

Ensuring the continued presence of the NOPCML at the Egmont Group meetings is a top priority, ensuring the growth and consolidation of Romania's international image, the continuous improvement of the quality of information exchange with foreign partners, based on a foundation of mutual trust, as well as the strengthening of the NOPCML's position in relation to the partner financial intelligence units present and international organisations.

The presence of the Office's delegation at these events represented an active means of involvement in the exchange of experience with other partner FIUs and contributed to the realisation of one of the fundamental objectives of the NOPCML, namely the strengthening of international cooperation in the field.

❖European Anti-Money Laundering Authority (AMLA)

The AMLA (Anti-Money Laundering Authority) is the new European authority to combat money laundering and terrorist financing, whose establishment is governed by Regulation (EU) 2024/1620 of the European Parliament and of the Council of 31 May 2024 and whose seat was established in February 2024 in Frankfurt, Germany.



The new Authority will provide direct supervision of selected obligated entities in the financial sector, including crypto-asset service providers; monitor, analyse and share information on ML/FT risks affecting the internal market; coordinate and supervise AML/CFT supervisors in the financial sector; coordinate and supervise AML/CFT supervisors in the non-financial sector, including self-regulatory bodies; and coordinate and support the FIU. The combination of direct and indirect supervisory powers in relation to obliged entities and also the provision of a AML/CFT support and coordination mechanism for FIUs is the most appropriate means to achieve supervision and cooperation between FIUs at Union level.

According to its Rules of Organisation and Functioning, the AMLA is governed by a General Board, which meets either in the Supervisory or FIU format.

It should be noted that, according to the national legal framework in the field of preventing and combating money laundering, established by Law 129/2019, the AML/CFT supervisory function in Romania is shared between the following authorities/institutions: the National Bank of Romania, the Financial Supervisory Authority, the National Gambling Office and the National Office for Prevention and Control of Money Laundering. In 2024, at the request of the AMLA, the heads of the supervisory authorities in Romania agreed that the permanent single joint sole representative, exercising the single voting right at national level in the General Board meeting in supervisory composition, should be appointed from the National Bank of Romania, in which context the Romanian Government approved the Memorandum on *"Information on the appointment of the single joint sole representative of the AML/CFT supervisory authorities in Romania in the General Board of the European Authority for Combating Money Laundering and Terrorist Financing - AMLA, in accordance with the provisions of Article 57 of Regulation (EU) 2024/1620"*.

As regards Romania's representation in the General Board of the AMLA in the FIU format, it is ensured by the NOPCML, in its capacity as Romania's Financial Intelligence Unit.

Last but not least, at the beginning of 2024, the National Office for Prevention and Control of Money Laundering received the visit of a delegation from France as part of the campaign to promote its candidacy to host the headquarters of the new authority, and on 19 November 2024, the representatives of the NOPCML participated in a preparatory meeting of the General Council of the AMLA, held in online format.

Also, during 2024, the two structures within DCSIFT, SAEI and SCRI, managed the national or institutional response, as the case may be, to numerous questionnaires launched by various European or international fora or by partner financial intelligence units, with various themes, of which the following are worth mentioning for illustration:

- ❖ ***Questionnaire on the implementation of the Anti-Money Laundering Directive (EU) 2018/1673***, developed in the framework of a survey launched by DG-HOME-European Commission;
- ❖ ***Questionnaire developed in the framework of the IEWG project, entitled "The Role of the Financial Intelligence Unit in the National Risk Assessment Process"***, received from the Egmont Group Secretariat;
- ❖ ***Questionnaire to help update the National Money Laundering Risk Assessment Guide developed by the FATF RTMG Working Group***;
- ❖ ***Questionnaire on the implementation of FATF Recommendation 15*** received from the Moneyval Secretariat;

- ❖ ***Questionnaire on the transition to the Markets in Crypto Assets Regulation (MiCAR)***, developed by the European Banking Authority (EBA) in co-operation with the European Securities and Markets Authority (ESMA) ;
- ❖ The European Banking Authority (EBA) ***survey on lending, borrowing and staking of cryptocurrencies***;
- ❖ ***Questionnaire developed in the framework of the IEWG project on the role of the Financial Intelligence Unit in combating environmental crime***, received from the Egmont Group Secretariat;
- ❖ ***Questionnaire on increasing the effectiveness of FIUs in asset recovery***, launched by the IEWG and forwarded to the NOPCML by the Egmont Group Secretariat;
- ❖ ***Questionnaire on the OECD's Ten Global Principles for Combating Tax Crimes***, forwarded to the NOPCML by the Ministry of Finance;
- ❖ ***Questionnaire developed in the context of the European Commission's preparation of the 4th edition of the EU Supranational Risk Assessment (SNRA)***;
- ❖ ***Questionnaire on analysing training needs in the field of European affairs***, submitted by the Romanian European Institute;
- ❖ ***Egmont 2024 biennial census***;
- ❖ ***Questionnaire to update anti-money laundering data from courts and prosecutors' offices for 2023*** received from the European Commission;
- ❖ ***Questionnaire on the implementation of Article 325 of the Treaty on the Functioning of the European Union (TFEU) for the year 2023***, received from the Anti-Fraud Department;
- ❖ ***Questionnaire on the IEWG Project on Effective Data Analytics IT Tools and Cloud Services*** , submitted by the Egmont Group Secretariat;
- ❖ ***OECD questionnaire for the Working Group on Bribery (WGB - Phase 2)***, disseminated by the Ministry of Justice;
- ❖ ***OECD questionnaire on centralised national registers***, sent to the Office by the National Agency for Fiscal Administration;
- ❖ ***Survey developed by the EU Correspondent Banking project team (EU-COBA) to evaluate the activities implemented within the COBA project***;
- ❖ ***Questionnaire on the implementation of Directive (EU) 2019/1153 and co-operation with Europol***, initiated by Europol Serious and Organised Crime - AP Asset Recovery and submitted to the NOPCML by the Europol Romania National Unit;
- ❖ ***Questionnaire for an internal Tracfin survey, necessary for the FIU France activity report***;
- ❖ ***Questionnaire on the role of civil society as a factor of resilience and co-operation during crises***, initiated by the General Secretariat of the Government and submitted to the NOPCML by the Ministry of Finance;
- ❖ ***Questionnaire on the training programme focusing on VASP sector risk assessment and AML supervision***, launched by FIAU Malta and the Egmont TATWG;
- ❖ ***Questionnaire developed in the context of the preparation of a report to the European Parliament and the Council on the application of Regulation 1672/2018 on cash controls on cash transactions into and out of the European Union, which entered into force on 03 June 2024 and replaced Regulation 1889/2005 (applied since 2007)***, initiated by DG TAXUD of the European Commission;

- ❖ ***The questionnaire drawn up in the context of the initiation of a local impact assessment of the UniCredit Group from an ESG - Environment, Social and Governance perspective***, which aimed to identify the relevant topics, namely the radiography of the economic, social and environmental impact in Romania for all UniCredit Group entities, submitted to the NOPCML by UniCredit Romania;
- ❖ ***Questionnaire on the limits imposed by national legislation on cash payments required for the implementation of the AML package in Austria***, initiated by the Austrian Permanent Representation to the European Union;
- ❖ ***Questionnaire on the update of data on the effectiveness of the national system for preventing and combating money laundering and terrorist financing (ML/TF), pursuant to Article 44 of Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018***, initiated by DG-FISMA-European Commission;
- ❖ ***The set of questionnaires developed by the World Bank as part of the B-READY 2025 consultations***;
- ❖ ***Questionnaire developed in the framework of the EU FIU Platform project: 'Use of information exchanged between FIUs and further dissemination of information under the agreement'***, submitted to FIU Romania by FIU Denmark;
- ❖ ***Questionnaire on Effective Informal International Co-operation***, developed under the joint FATF/Egmont Group/INTERPOL/UNODC project;
- ❖ ***Questionnaire on National Anti-Money Laundering Risk Assessment in Israel***;
- ❖ ***Questionnaire on the beneficial owners of legal entities that have to be registered in the Register of Beneficial Owners***, submitted to FIU Romania by FIU Bulgaria;
- ❖ ***Questionnaire on the existence of a list of Publicly Exposed Persons (PEPs) and their related persons***, submitted to FIU Romania by FIU Bulgaria;
- ❖ ***Questionnaires on "Effective implementation of the sanctions regime and enhanced cross-border co-operation in the EU Member States"***, developed in the framework of the 2023 TSI CoE/EU Project;
- ❖ ***Questionnaire on combating cross-border drug trafficking in the EU***, sent to the NOPCML by the Ministry of Justice;
- ❖ ***Questionnaire on sanctions applicable in case of infringements of the beneficial ownership requirements***, sent by DG-FISMA of the European Commission;
- ❖ ***Joint IEWG-PPWG questionnaire on the revision of the Egmont Principles on the exchange of information between FIUs***.

During the reporting period, the European Affairs and Inter-institutional Co-operation Department managed the agenda of events at the level of the institution and facilitated the participation of NOPCML personnel in multiple working groups, conferences, seminars and meetings, both nationally and internationally, addressing key topics in its field of activity, among which we mention:

- ❖ ***The meeting of the Inter-Institutional Advisory Group/GC within the PROTECTOR National Awareness Programme, held on 11.01.2024, in Bucharest, as well as the 5 PROTECTOR Conferences, organised by the RIS in physical format, on 12.03.2024 in Cluj, 11.04.2024 in Timișoara, 21.05.2024 in Brașov, 10.10.2024 in Craiova and 07.11.2024 in Ploiești***;
- ❖ ***Online meeting organised by EFIPPP-EUROPOL on 12.01.2024***;

- ❖ **Inter-institutional Coordination Meetings in the field of European Affairs (SCEA) at the level of Secretary of State/President**, organised by the Ministry of Foreign Affairs on 22.01.2024, 04.03.2024, 15.04.2024, 27.05.2024, 22.07.2024 - online and 16.10.2024 - in physical format;
- ❖ **Inter-institutional Coordination Meetings in the field of European Affairs (CEEA) at technical level**, organised by the Ministry of Foreign Affairs on 07.02.2024, 08.05.2024, 01.07.2024 and 22.11.2024 - in physical format;
- ❖ **MONEYVAL online session on the draft efficiency questionnaire for the sixth round**, held on 05.02.2024;
- ❖ **Meeting of the Black Sea Anti-Corruption Working Group**, organised by the Federal Bureau of Investigation (FBI) from 06.02.2024 to 08.02.2024 in Tbilisi, Georgia;
- ❖ **FATF Plenary and Working Group Meetings**, organised from 19.02.2024 to 23.02.2024, in Paris, France;
- ❖ **The Peer Review Group meeting, during which the Report of the Global Forum on Transparency and Exchange of Information for Tax Purposes was discussed and endorsed**, took place in Paris, 27.02-01.03.2024;
- ❖ **The visit of the Ambassador Extraordinary and Plenipotentiary of the Kingdom of Saudi Arabia - Mohammed Abdulghani M Khayat** on 06.03.2024, in Bucharest, Romania;
- ❖ **The webinar organised by Europol in cooperation with CEPOL on the European Union Serious and Organised Crime Assessment Report (SOCTA)** on 07.03.2024;
- ❖ **Conference "Making Sanctions Work: The Way Forward in 2024"**, organised by FIU Latvia on 19.03.2024 in Riga, Latvia;
- ❖ **Multinational event on strategic analysis, organised within the framework of the TSI Poland project "Strengthening the risk assessment mechanisms and the AML-CFT strategic analysis function of the Polish financial intelligence unit"**, 20.03.2024 - 21.03.2024, Warsaw, Poland;
- ❖ **EU-COBA closing conference** on 22 March 2024 in Brussels, Belgium;
- ❖ **Meeting of the Interministerial Committee for the Implementation of International Sanctions**, organised on 22.03.2024, in Bucharest, Romania;
- ❖ **Meeting of the Inter-Institutional Council for the Implementation of International Sanctions (ICIIS)**, which took place at the MFA headquarters on 02.04.2024;
- ❖ **Private Sector Meeting on FATF Recommendation 16 and FATF Private Sector Consultative Forum**, organised on 03.04.2024-05.04.2024, Vienna, Austria;
- ❖ **First meeting of all designated members of the SNLAF networks/working groups** organised in online format on 17.04.2024;
- ❖ **Online workshop on cooperation in tax recovery and law enforcement**, organised by Fiscalis from 23.04.2024 to 24.04.2024;
- ❖ **Meeting of the Interministerial Committee for the Implementation of International Sanctions**, organised on 24.04.2024, in Bucharest, Romania;
- ❖ **Annual conference "Technical Assistance Instrument"**, organised by DG REFORM of the European Commission from 24.04.2024 - 25.04.2024 - online participation
- ❖ **Interviews related to the second phase of the evaluation of the Working Group on Bribery (WGB) of the Organisation for Economic Co-operation and Development (OECD)**, held at the Ministry of Justice premises on 26.04.2024;

- ❖ **Meeting of the USA - Eastern Europe Cryptocurrency Working Group**, which took place from 13.05.2024 - 16.05.2024 in Budapest, Hungary;
- ❖ **Round table event on "The stage of implementation of the MONEYVAL recommendations following the May 2023 Evaluation Report for Romania"**, organised by Transparency International Romania on 14.05.2024 in Bucharest, Romania;
- ❖ **Risk Assessment Workshop for EU AML/CFT Supervisory Authorities** on 14.05.2024 - 15.05.2024 - online participation;
- ❖ **The second edition of the "Symposium on Financial Crime in Central Europe"**, organised by Deloitte on 21.05.2024 in Bucharest, Romania;
- ❖ **Symposium "Enhancing Counterproliferation Finance Through Sanctions Compliance"**, organised by the US Department of State and CRDF, from 22.05.2024 - 23.05.2024 in Bucharest, Romania;
- ❖ **Conference "Charting the Course in AML/CFT Administrative Enforcement"**, organised by FIAU Malta from 04.06.2024 - 05.06.2024, Attard, Malta;
- ❖ **Webinar organised within the European Blockchain Sandbox project** on 06.06.2024;
- ❖ **The multinational event on "AML/CFT supervision of DNFBPs and VASPs - practical application of sector-specific measures"**, organised in the framework of the joint Council of Europe and European Commission project on "Strengthening risk-based AML/CFT supervision in Lithuania" from 11.06.2024 to 12.06.2024, in Vilnius, Lithuania;
- ❖ **Crypto-assets training session** organised by the European Banking Authority (EBA), from 03-04 July 2024, in Paris, France, as well as online;
- ❖ **Event to present the results of the European Commission's study on the interconnection of centralised registers of bank accounts (BARIS) and the preferred technical solution**, organised online on 16.07.2024;
- ❖ **Training course in the field of asset recovery and international co-operation**, organised by CEELI Institute, from 16.09.2024 to 19.09.2024, in Prague, Czech Republic;
- ❖ **The event entitled "Anti-Money Laundering and Financial Education - Italy and Romania: Experiences and Best Practices in light of OECD Standards"**, organised by the National Bank of Romania and the Embassy of the Republic of Italy in Romania, on 10.10.2024 at the NBR headquarters;
- ❖ **The International Workshop on Combating Money Laundering**, organised by the Dutch Central Bank (De Nederlandsche Bank - DNB) in physical format, in Amsterdam on 10-11 October 2024;
- ❖ **Round table discussion on Recognising and Disrupting Front Companies**, organised by the US Department of State and the Chemical Security Programme (CSP), Pacific Northwest National Laboratory (PNNL), on 14.10.2024 and 15.10.2024, in Bucharest, Romania;
- ❖ **The National Conference on Internal Audit**, organised by the Romanian Association of Internal Auditors (AAIR) in partnership with the National Bank of Romania, on 31.10.2024, at the NBR headquarters;
- ❖ **Meeting of the USA - Eastern Europe Cryptocurrency Working Group**, held from 04.11.2024 - 06.11.2024 FIZIC, Opatija, Croatia;
- ❖ **The "Complex Financial Investigations" event**, organised by the USA Department of Justice, OPDAT and NAD from 05.11.2024 - 07.11.2024, in Poiana Brasov, Romania;

- ❖ ***Meeting "Empowering Women Leaders: Mainstreaming Gender Perspectives in Anti-Money Laundering/Counter-Financing of Terrorism (AML/CFT)", organised by the UN Office on Drugs and Crime (UNODC) from 05.11.2024 - 07.11.2024, in Vienna, Austria;***
- ❖ ***Meeting with supervisors in the framework of the OECD evaluation of the automatic exchange of information on financial accounts, 11.11.2024 - 14.11.2024, Bucharest, Romania;***
- ❖ ***Conference "Fraud, Cyber & Compliance - The Way from Prevention to Deterrence", organised by the Association for the Prevention and Combating of Fraud (APCF) on 14.11.2024, at the Novotel Hotel;***
- ❖ ***The ceremony to mark the 20th anniversary of the Directorate for the Investigation of Organised Crime and Terrorism, organised on 21 November 2024, at the Palace of Parliament.***

SAECI also managed the organisation by the NOPCML, in collaboration with the representatives of the European Commission, of the event for the presentation of the new European anti-money laundering (AML) legislative package, entitled ***New European regulations in the AML/CFT field: challenges and prospects***, which took place on 11 October 2024, at the National Institute of Statistics, 16 Libertății Boulevard, sector 5, Bucharest.

In order to allow a personalised approach, tailored to the needs of each category of participants, the event was structured in two distinct sessions, namely a session dedicated to the national authorities with competences in the AML/CFT field, attended by representatives of the NOPCML together with representatives of the NBR, FSA, NCA, NAD, DIOCT, GIRP, MoF, MoJ, NGO, SRI, NAMSA, NAFA and a session for the professional associations in the financial-banking field and the self-regulatory bodies of the liberal professions in Romania. This event was an important step in the process of understanding and preparing the national legislative framework for the requirements imposed by the new European regulations, as well as for raising awareness of the importance of preventing money laundering at all levels.

In order to ensure the participation of the Office's representatives in activities organised at international level in the specific field of competence, the European Affairs and Interinstitutional Co-operation Service is responsible for drawing up the appropriate travel documents and for handling the formalities for obtaining diplomatic and service passports.

Also, in 2024, in accordance with the provisions of the Order of the President of the NOPCML no. 138 of 27.05.2021 on the approval of the duties of the structures within the National Office for Prevention and Control of Money Laundering, with subsequent amendments and additions, SAECI-DCSIFT prepared the Activity Report of the Office for 2023, based on the contributions of the specialised structures and initiated the necessary steps to ensure the authorised translation from Romanian into English, as well as the publication of the two versions of the document on the website of the institution: www.onpcsb.ro.

INFORMATION TECHNOLOGY, DATABASES AND STATISTICS

STRATEGIC ANALYSIS

Money laundering and terrorist financing constitute two financial crimes with significant economic implications, posing a direct threat to the financial sector of the affected country and to its stability in general. There is thus a need for effective anti-money laundering and counter-terrorist financing systems to help mitigate the factors that facilitate financial exploitation.

In accordance with the provisions of Law 129/2019 on preventing and combating money laundering and terrorist financing, as well as amending and supplementing some regulatory acts, the Financial Intelligence Unit of Romania (FIU Romania) has been mandated to carry out, in addition to the operational analysis, the strategic analysis to address the trends and recurrent practices of money laundering and terrorist financing

Recommendation No 29 of the Financial Action Task Force (FATF) has defined strategic analysis as a function that utilises available and obtainable information, including data that may be provided by other competent authorities, to identify trends and patterns in money laundering and terrorist financing.

Thus, the FIU Romania uses the financial information received under Law 129/2019, as well as information from other sources, to analyse financial transactions suspected of being associated with money laundering and/or terrorist financing.

The objectives of the strategic analysis include the identification and understanding of current trends, typologies and cases of money laundering and terrorist financing that can contribute to combating money laundering and terrorist financing at national level.

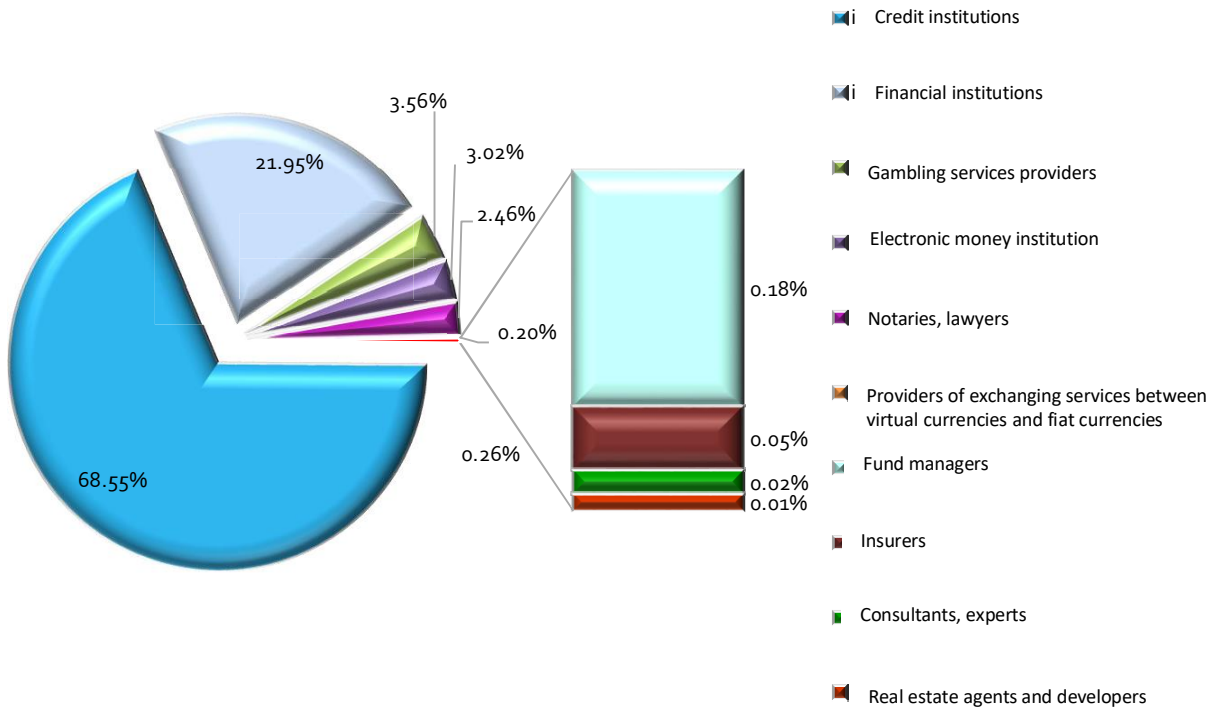
❖ ASPECTS RELATED TO THE REPORTING OF SUSPICIOUS TRANSACTIONS TO THE OFFICE IN 2024:

✍ In 2024, tax evasion, fraud and computer fraud were the most reported offences by obliged entities and are suspected to be the main offences generating the laundered assets.

✍ Of the total suspicious transaction reports received by the Office in 2024, by categories of obliged entities, most were issued by credit institutions (Romanian and foreign banks), in the proportion of 68.55%, followed by those issued by financial institutions (mainly those specialised in money remittance activity).

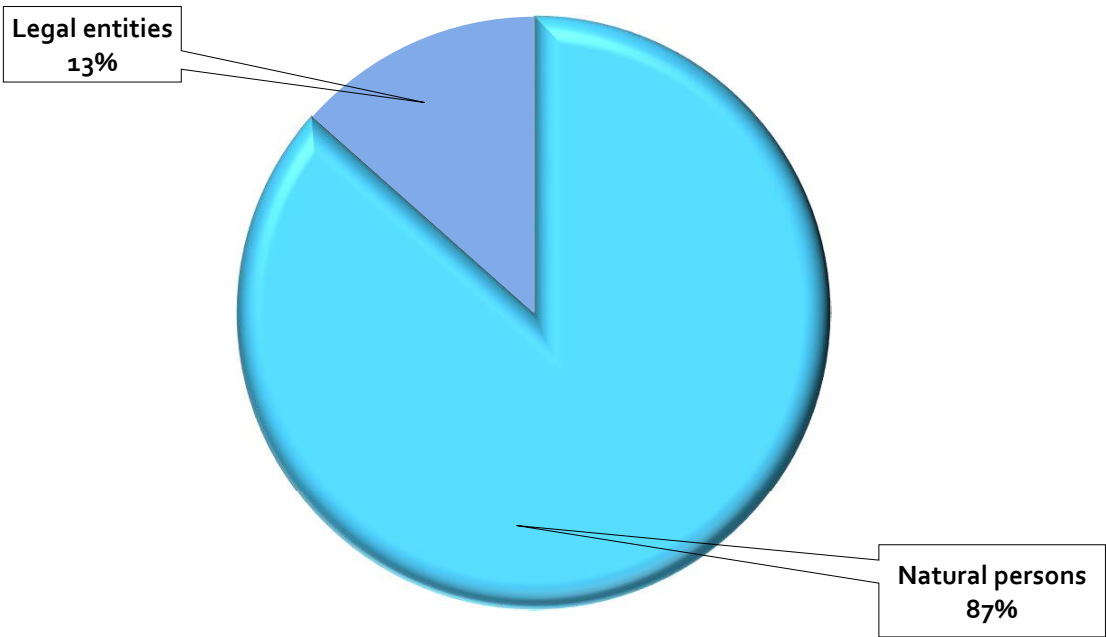
Thus, in 2024, banks continued to be the main category of entity reporting suspicious transactions, with the large number of STRs submitted by banks indicating that they are fully aware that this sector is at risk of being exploited for money laundering and terrorist financing.

Structure of obliged entities that submitted STRs in 2024

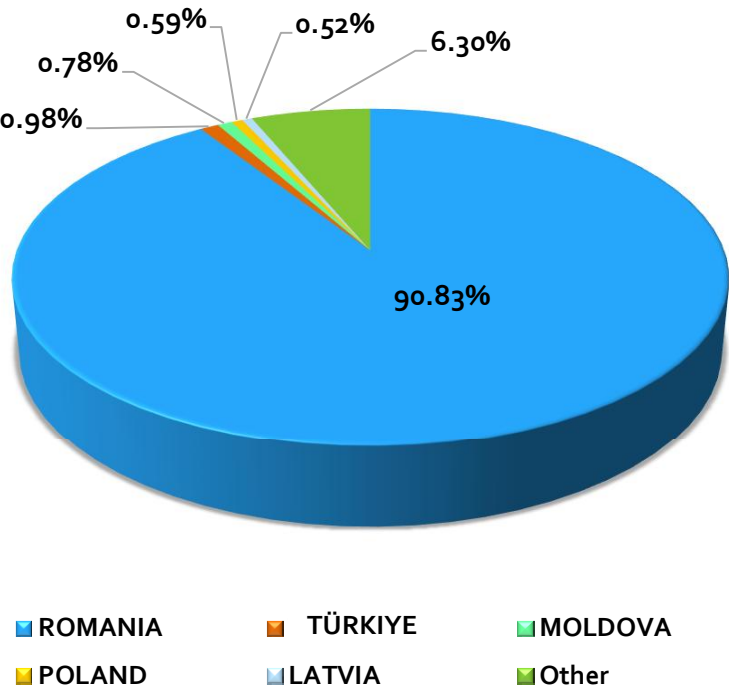


The largest share of STRs was accounted for by STRs drawn up for clients - natural persons (86.55% of all STRs), followed by those for clients - legal entities (13.45%). Over 90% of the persons for whom STRs were drawn up were natural persons of Romanian nationality and legal entities registered in Romania.

Structure of STRs by type of persons reported

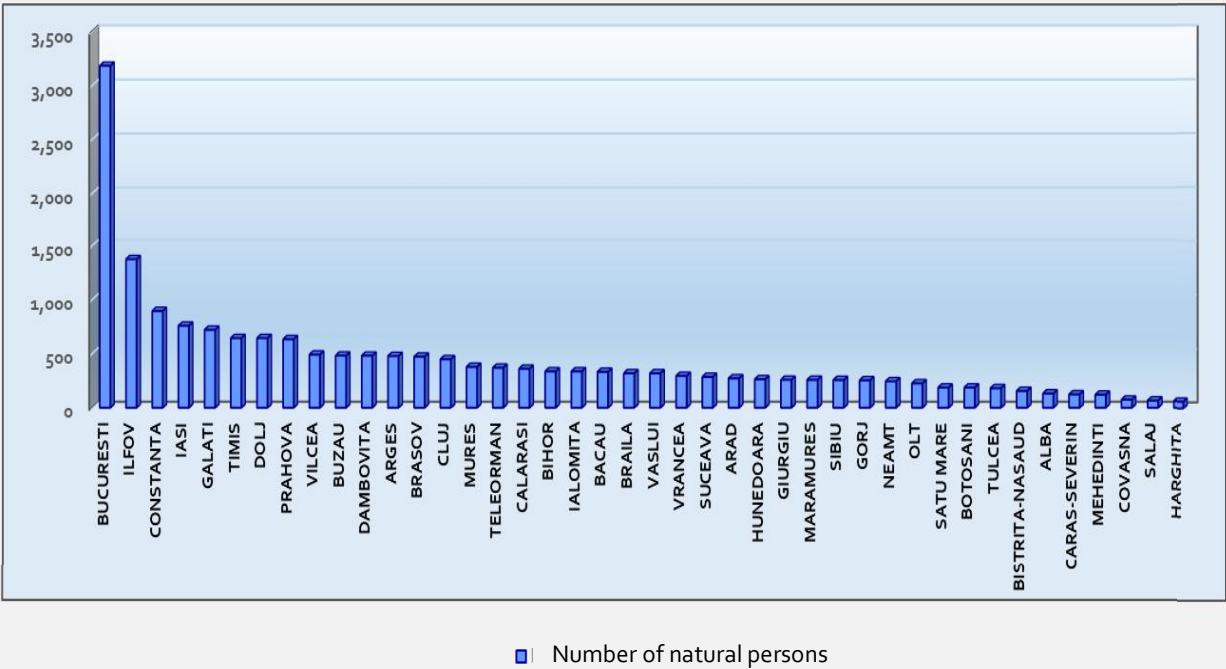


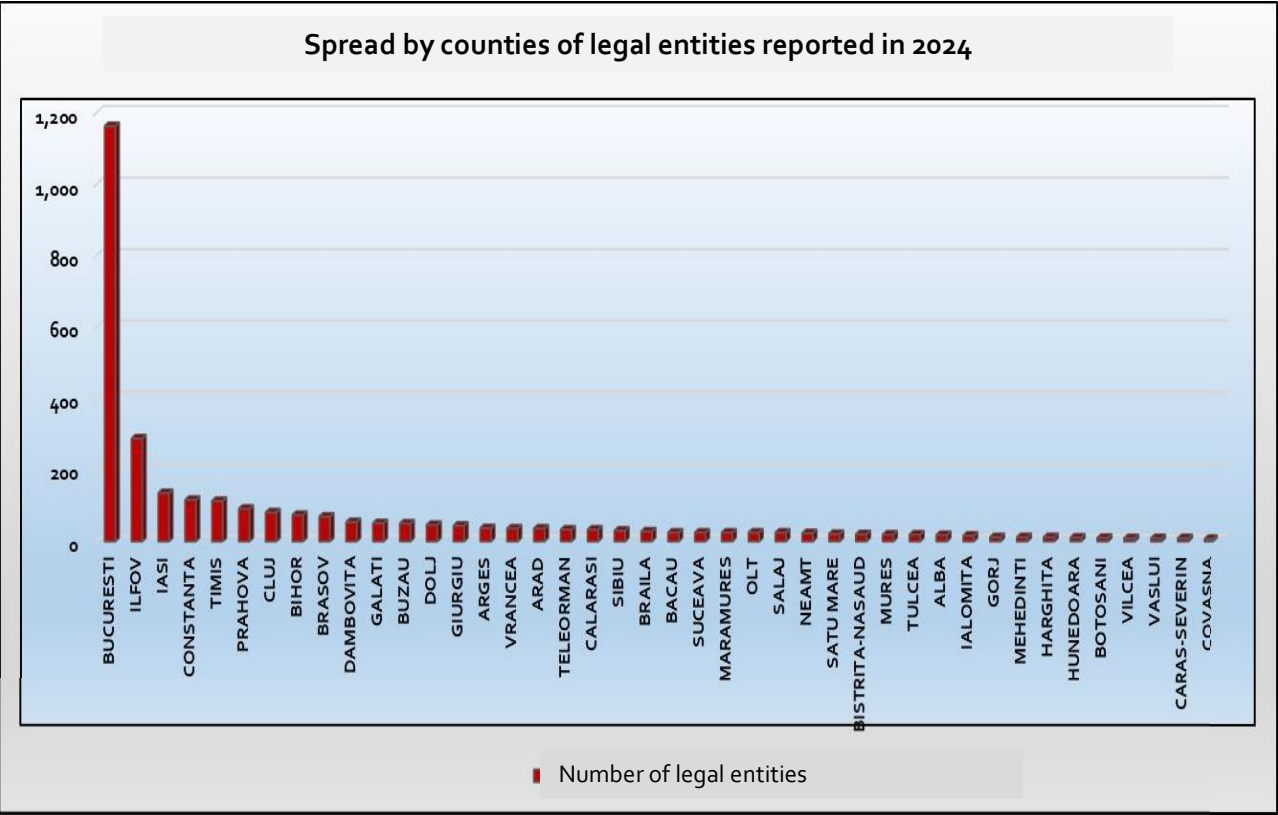
Citizenship/country of registration of persons reported in 2024



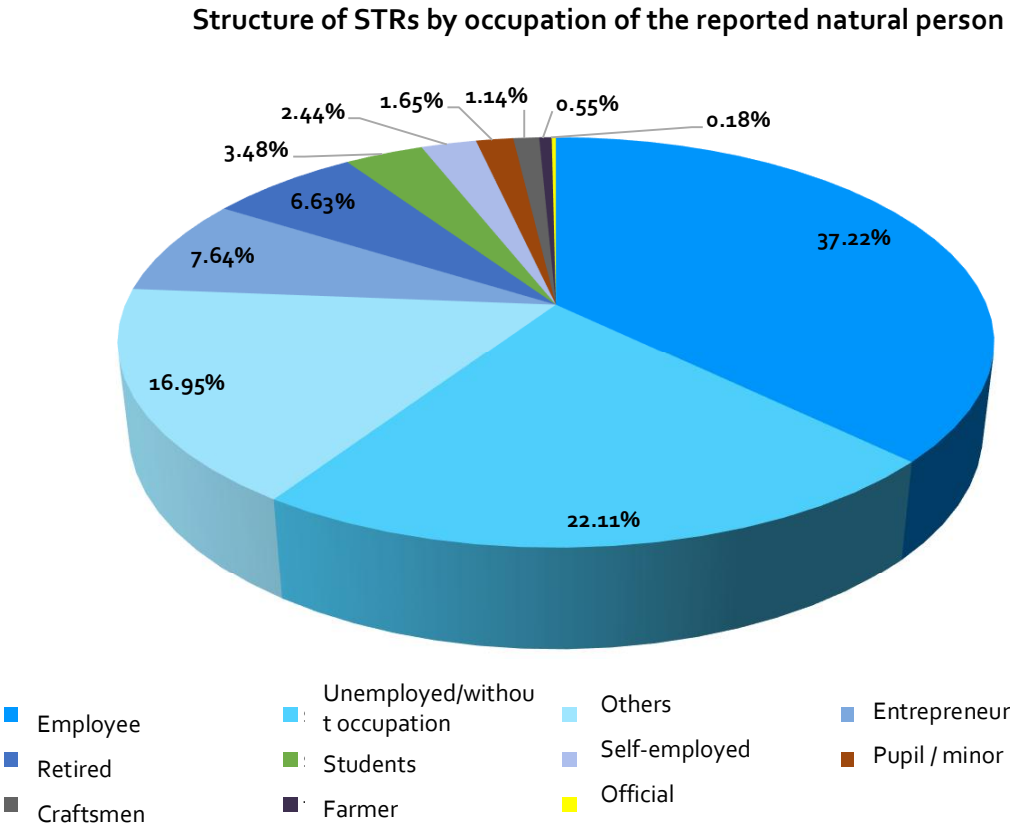
✎ The digrams below show the predominant areas of residence of individuals and organisations reported in the STRs during 2024. These were Bucharest, Ilfov, Constanța and Iasi.

Spread by counties of natural persons reported in 2024



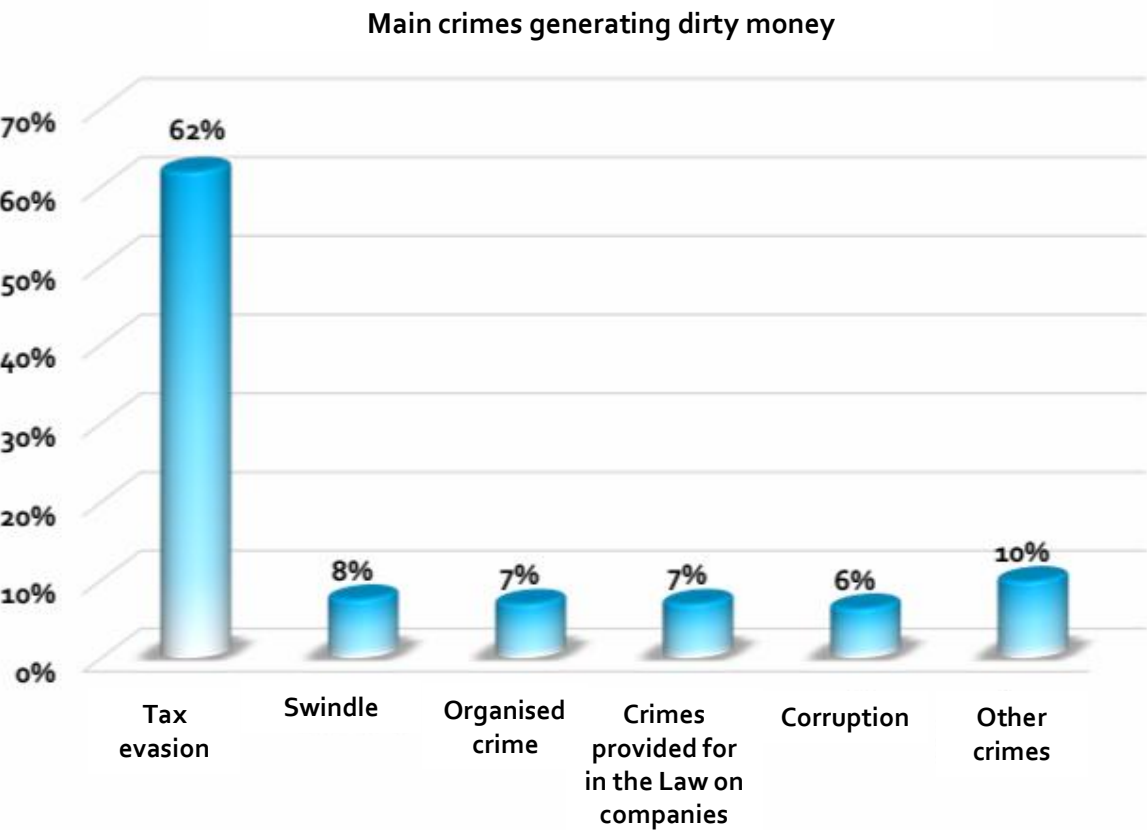


✎ According to the structure of natural persons reported for carrying out suspicious transactions, the main category is made up of those who are employees (approx. 37%), followed by the unemployed (22%).



❖ **MONEY LAUNDERING ASPECTS AND TRENDS IDENTIFIED DURING 2024**

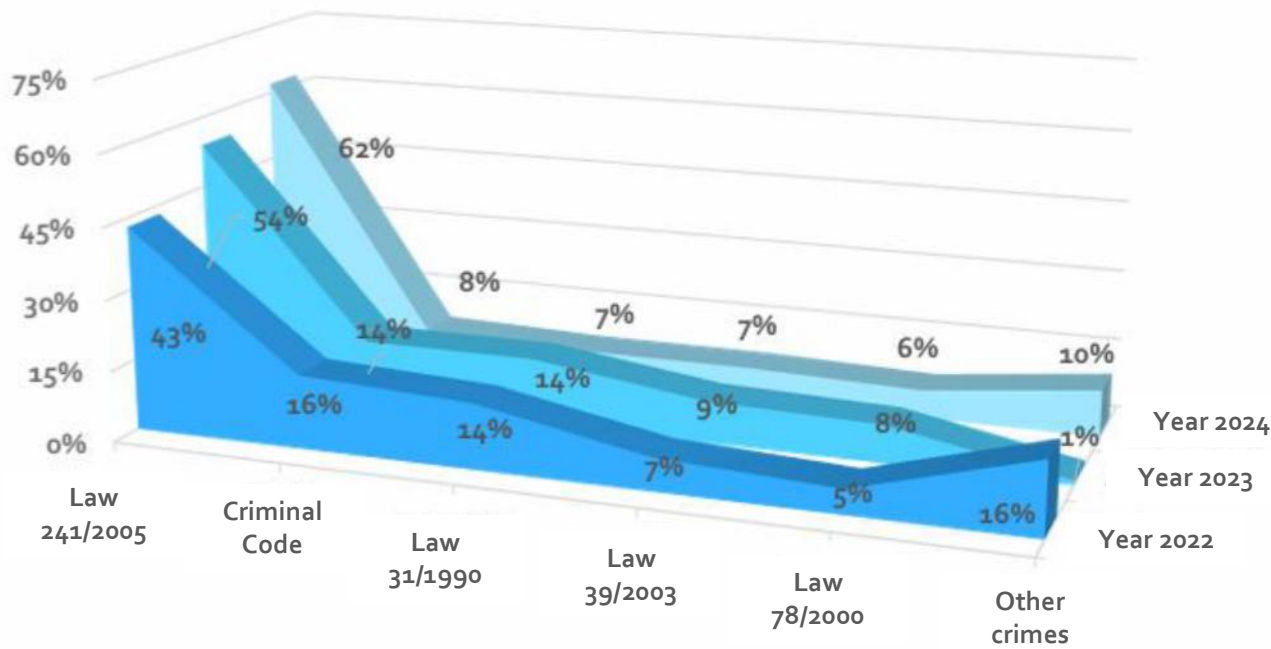
In 2024, the financial information received by FIU Romania was used in a wide range of money laundering analyses, where the origins of suspected proceeds of crime were related to tax evasion, fraud, organised crime, corporate offences, corruption.



The comparative analysis of the years 2022-2024, indicates a certain consistency in the trends of identified dirty money generating crimes. Thus, during the three years, the main money laundering crimes identified in the disseminated analysis proceeds were the ones provided for in:

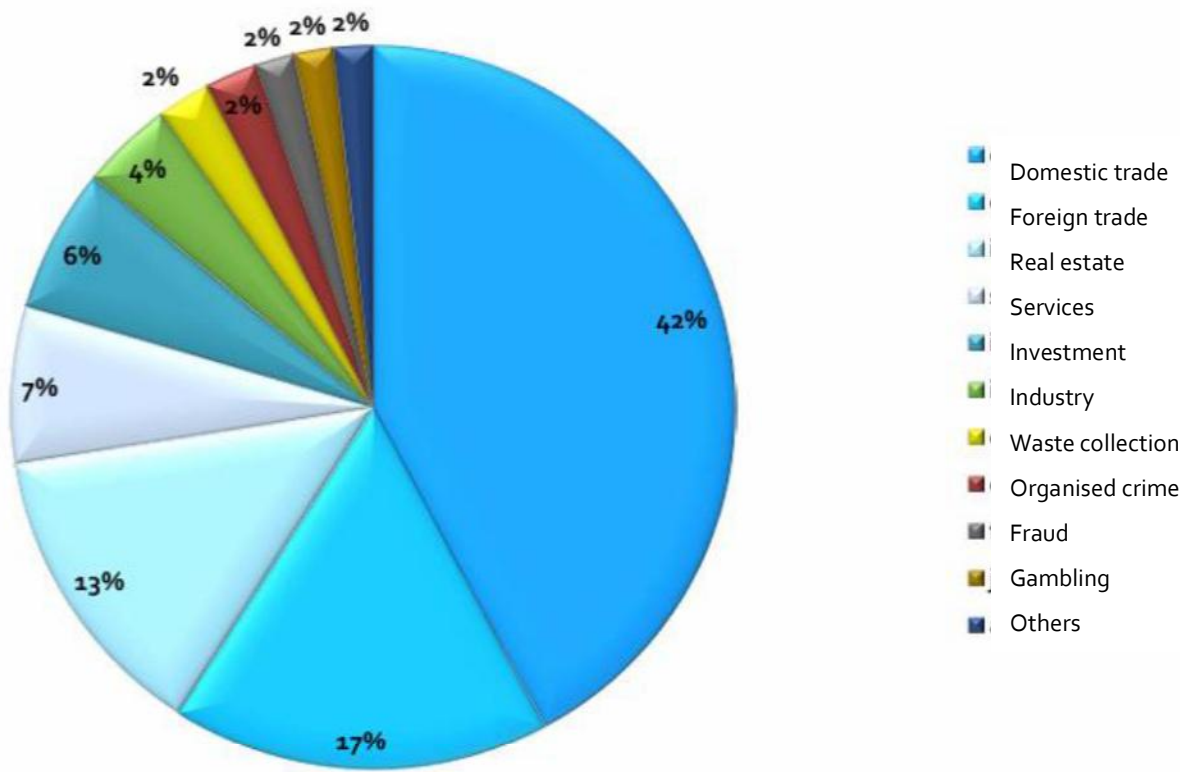
- Law 241/2005 on preventing and combating tax evasion (tax evasion);
- Criminal Code (swindle);
- Law 31/1990 on Companies (use, in bad faith, of the assets or credit enjoyed by the company for a purpose contrary to its interests or for its own benefit or to favour another company in which it has direct or indirect interests);
- Law 39 / 2003 on preventing and combating organised crime (cross-border crimes).

Crimes generating dirty money between 2022-2024



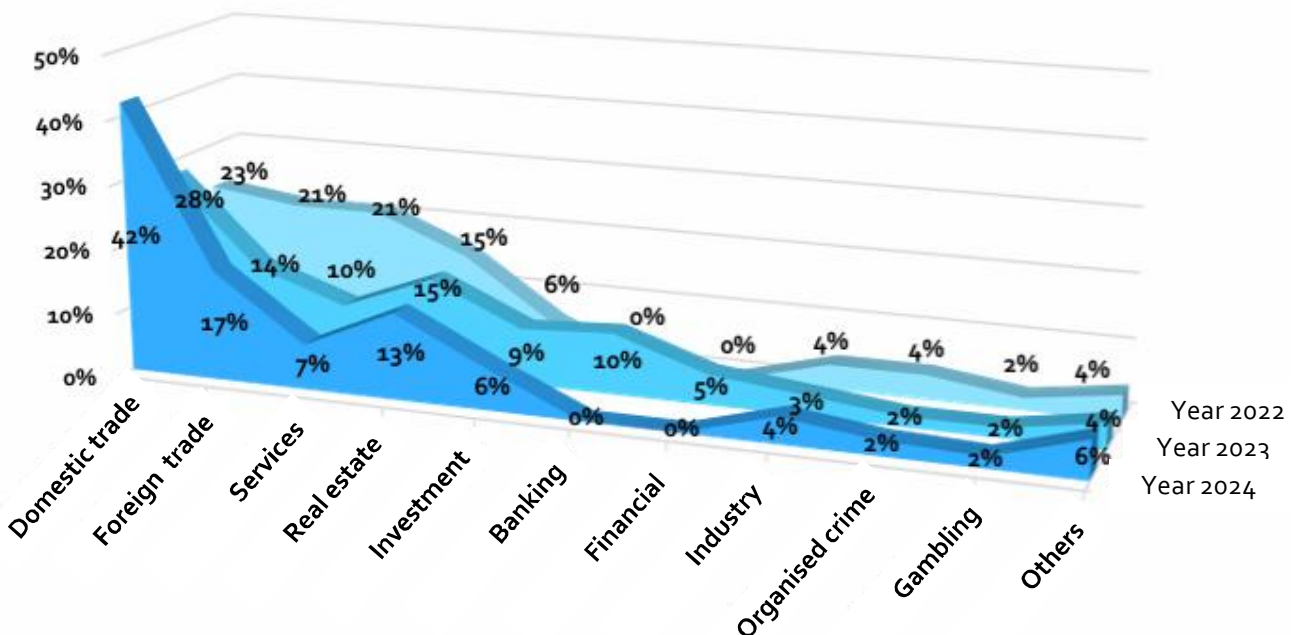
Funds subject to money laundering originated mainly from domestic trade, foreign trade and real estate.

Structure of cases by area in which dirty money was generated



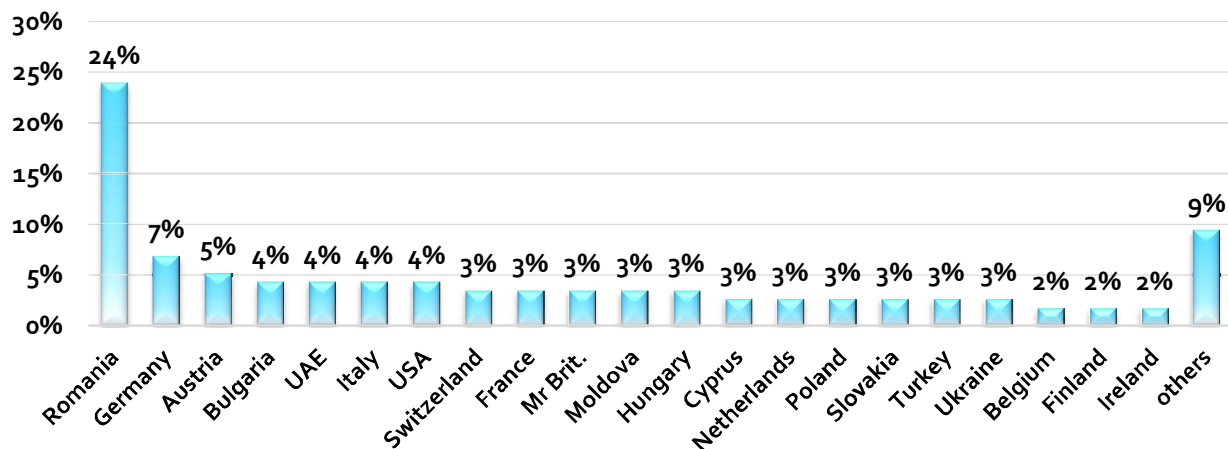
During the years 2022, 2023 and 2024, the same main areas of activity generating funds subject to the laundering process remained the same, namely: domestic trade, foreign trade, services and real estate. In 2024, there was a more marked increase in the percentage of cases where the laundered funds originated from domestic trade, i.e. from 23 per cent in 2022 to 42 per cent in 2024. Fluctuations were also recorded for funds sourced from the services and banking sectors, with the remaining source areas following a similar trend over the three years.

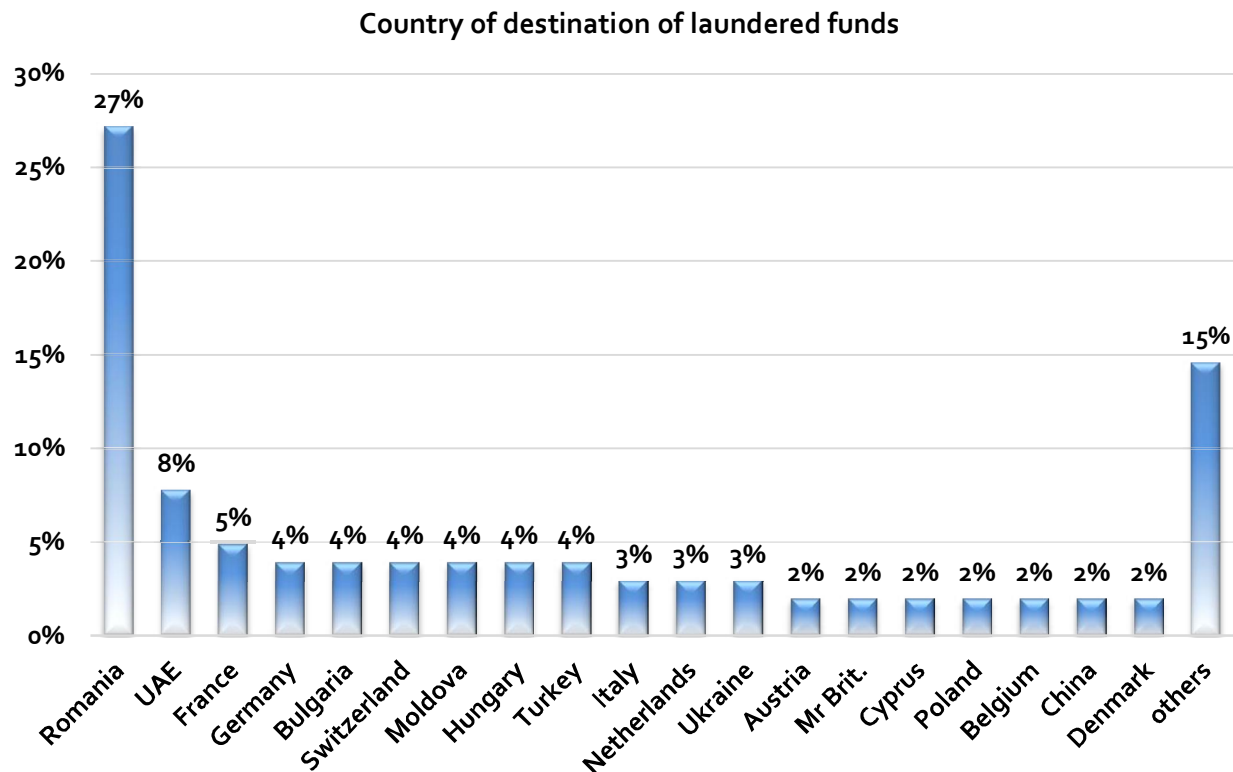
**Areas of activity from which the laundered funds originated
between 2022 and 2024**



As regards the countries of origin and destination of the funds involved in the money laundering financial circuits identified in the analyses carried out in 2024, Romania came first in both cases.

Country of origin of laundered funds





❖ MONEY LAUNDERING ASPECTS AND TRENDS IDENTIFIED DURING 2024

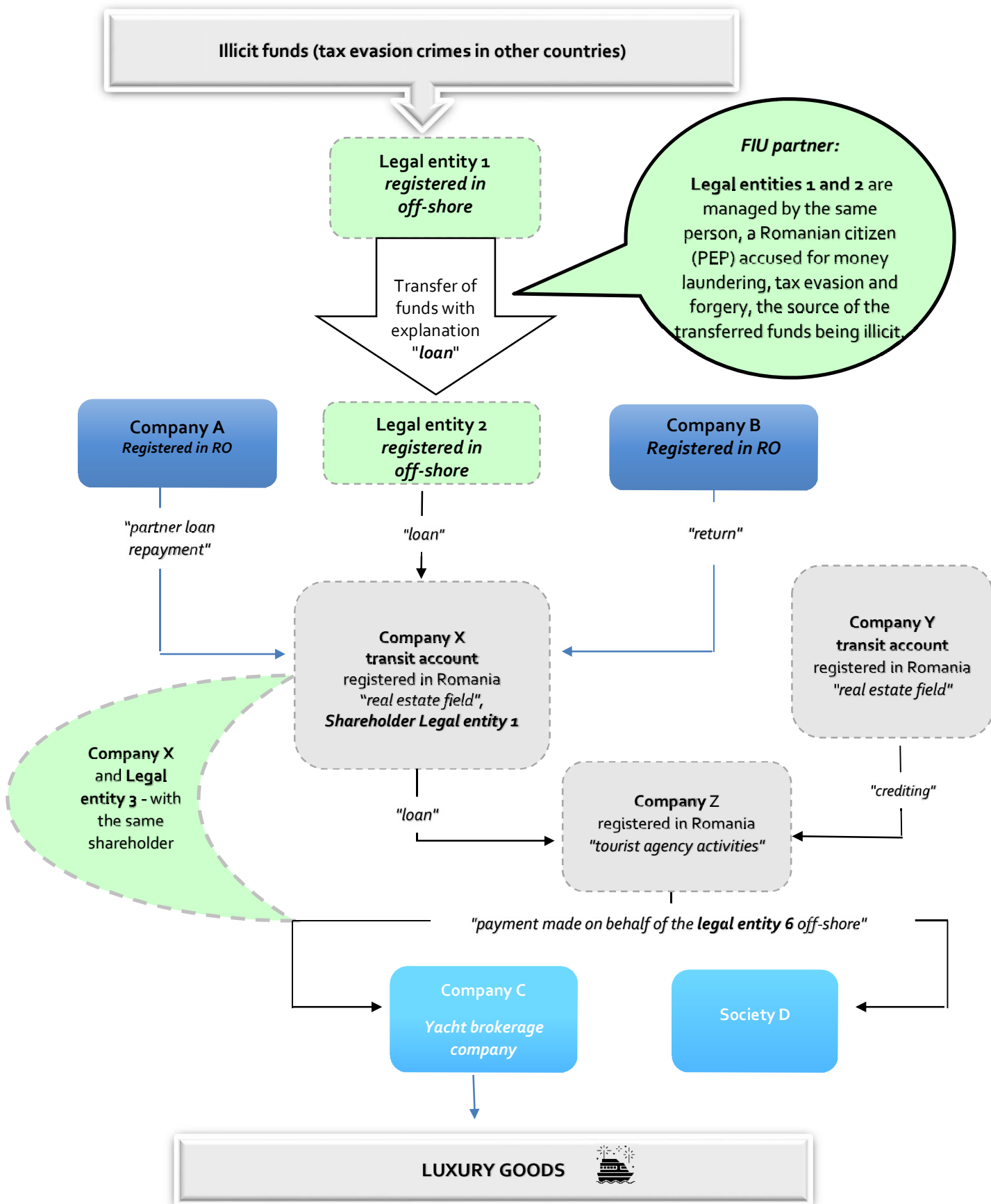
Based on the cases frequently encountered in 2024 and the recurring tendency of persons involved in suspected money laundering circuits to use a particular instrument or method to implement their plans, a set of money laundering typologies has been identified, grouped below according to the offence generating the illicit funds subject to the laundering process:

1. Illicit funds deriving from the commission of crimes referred to in Law 241/2005 on preventing and combating tax evasion:

Case 1: (tax evasion)

Description of the typology: the funds derived from the commission of the tax evasion crimes were successively transferred, in round amounts, of large values, through the accounts of legal entities, forming financial circuits involving entities registered in offshore jurisdictions, with the same shareholders (natural persons of Romanian nationality and entities registered in offshore jurisdictions), accompanied by explanations such as "loan", "loan repayment", "partner loan payment". Some of the illicit funds were introduced into the financial circuit through foreign exchange transactions in the form of a "loan", the origin of which could not be justified, according to the information received from the partner FIU.

The purpose of the financial circuits set up was to put the funds in the possession of legal persons controlling the original authorising officers and to purchase luxury goods.



Indicators of suspicion specific to this typology:

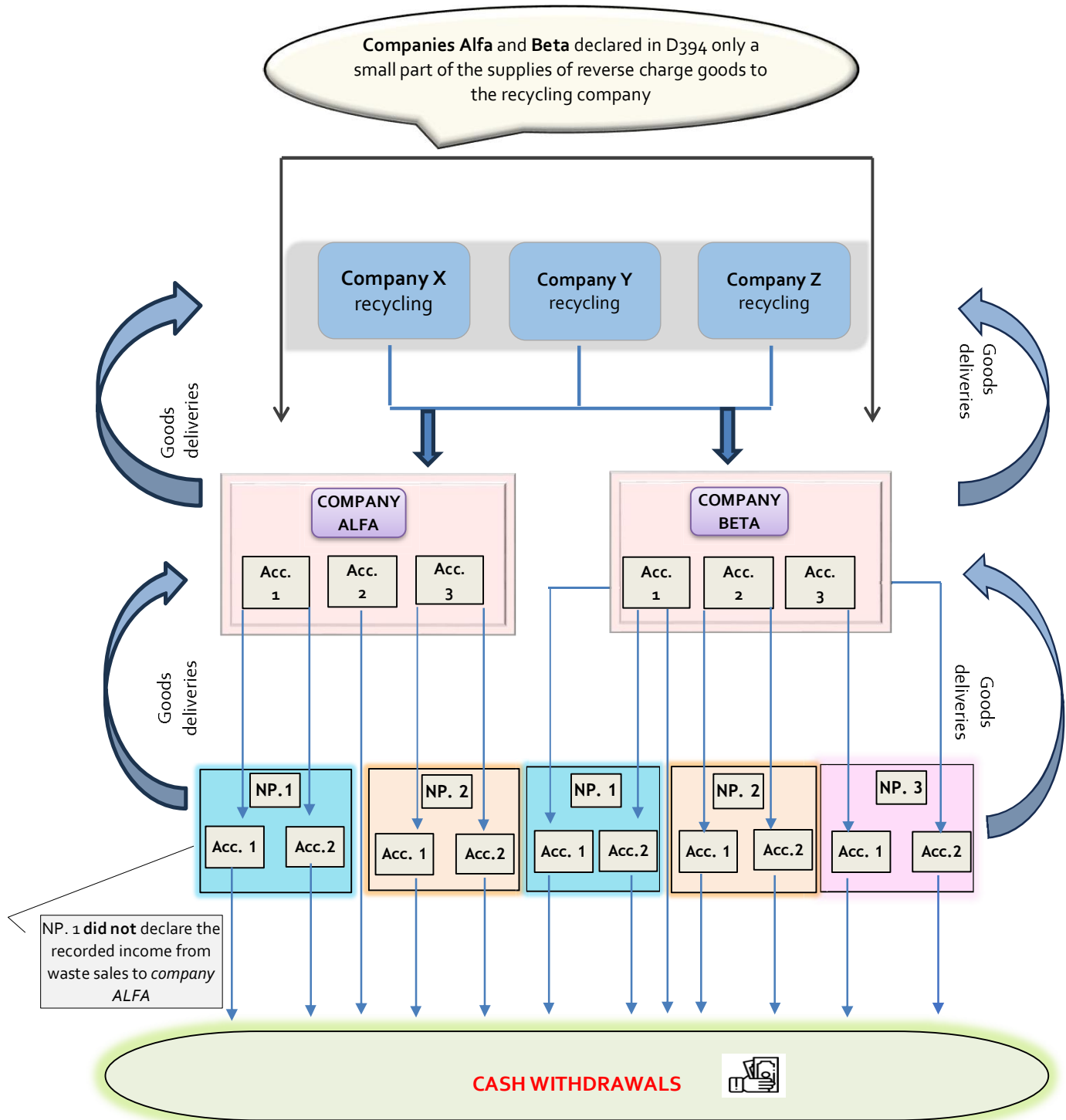
- Repeated transfers of large amounts, with the explanation "loan", between companies that were not making a profit and did not have the financial funds to lend;
- Significant payments of funds, made in a short period of time, by company Z on behalf of a company registered in an offshore jurisdiction (Legal Entity 3), in which company X is a partner;
- Creating a circuit of funds involving entities registered in offshore jurisdictions;
- Using accounts held by legal entities registered in Romania (vulnerable area of activity - real estate) as transit accounts;
- Receiving sums of money, totalling up to a significant amount, from a non-resident company, which are then invested in luxury goods (purchase of a luxury yacht);
- Negative information on the natural person partner;
- Correlation between credits and debits to and debits from the account on the same day or the following days.

Case 2: *(tax evasion)*

Description of the typology: Companies **ALPHA** and **BETA**, follow the same transactional pattern, i.e. receipts from companies **X**, **Y** and **Z**, firms operating in the field of trade of recyclable materials, followed by cash withdrawals, either directly or indirectly, after the money is routed between the bank accounts of the same individuals.

The financial circuits created consisted in the transfer of funds from the accounts of companies operating in the recycling sector to the accounts of two newly established companies, with no financial data reported in the year prior to the transactions, and the funds were subsequently either withdrawn in cash or transferred to the accounts of individuals (some of whom were partners/directors of the newly established companies), from where they were withdrawn in cash. It should be noted that the accounts held by the same persons in the records of several banking units in Romania were used for the transfer of funds.

The failure to declare by natural persons of the income received from the sale of recyclable materials to Alfa and Beta companies, as well as the failure to record in the accounting documents the bank transactions carried out through the accounts of the two companies, raised suspicions about the reality of the commercial transactions, as there is a suspicion that the operations recorded through the accounts of Alfa and Beta companies do not have a real economic purpose.



Indicators of suspicion specific to this typology:

- The high and repetitive amount of receipts from company Alfa, followed by cash withdrawals from ATMs;
- There are suspicions that the operations recorded through the accounts of Alfa and Beta companies have no real economic purpose. They do not correspond to a normal trading pattern, involving transactions with newly established companies, or companies with no financial data reported in the previous year, which raises suspicions of involvement in evasion;
- Unusual transfers of funds between related natural persons and legal entities;

- Mismatch between the information provided by the customer at the initiation of the business relationship and the transactions identified through the customer's accounts;
- There are suspicions about the source, destination of funds, the relationship between the parties, and the accounts appear to be used as transit accounts, with the credit and debit matching.

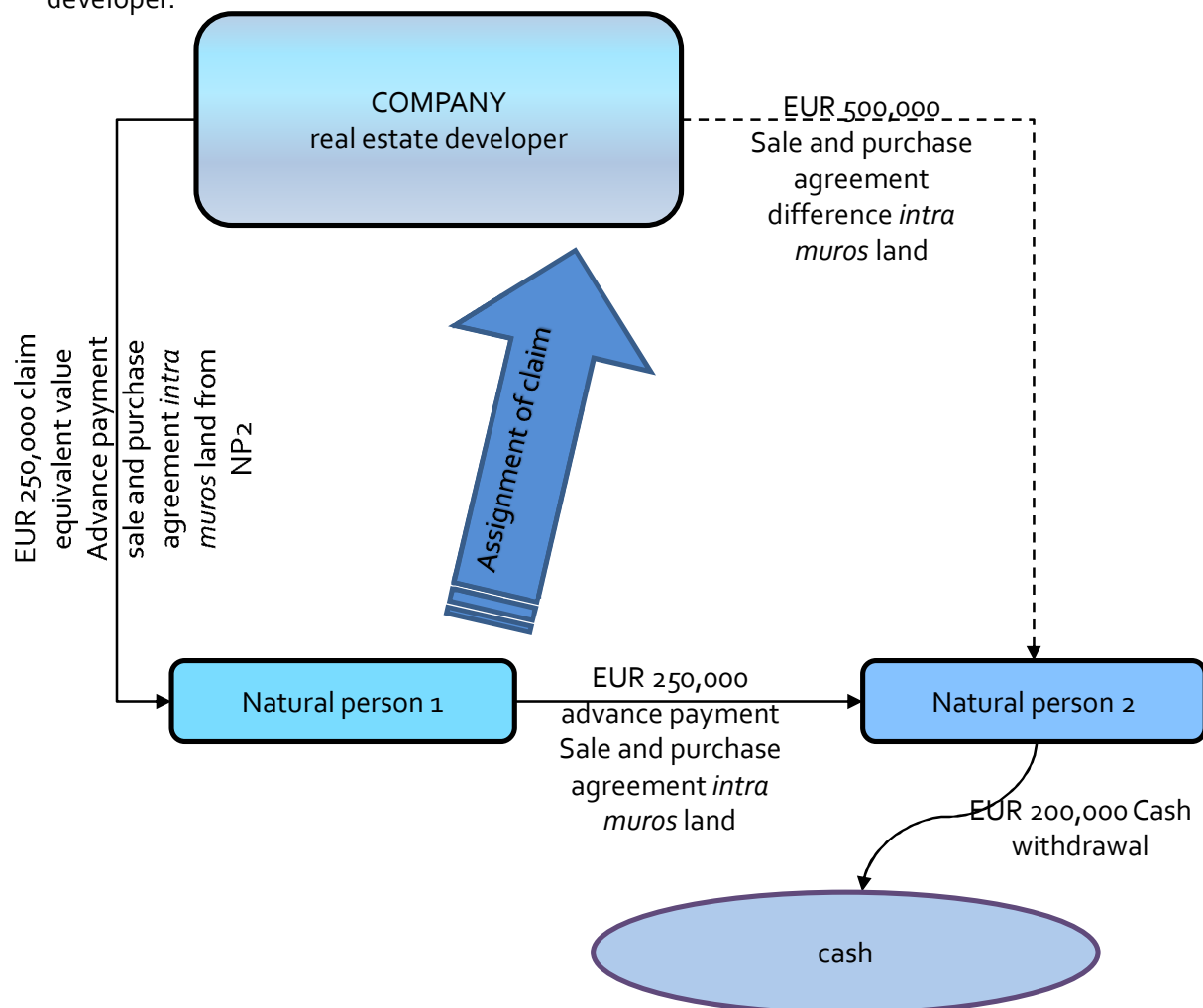
Case 3: (tax evasion)

Typology description: The funds come from the real estate market.

Natural person 2 collects, at time T₁, from Natural person 1 EUR 250,000, as an advance payment on a sale and purchase agreement of *intra muros* land (7,500 square metres). According to the contract, the receipt represents a portion of the total price of EUR 750,000, corresponding to an average price of EUR 100 per square metre. According to information from the real estate market, the price seems clearly overvalued, the average market price being approx. EUR 20 /square metre, resulting in a difference of EUR 600,000 compared to the real price.

Natural person 2 makes, at T₂, a cash withdrawal - amounting to EUR 200,000 - from the amount received as an advance payment.

Subsequently, at T₃, natural person 1 assigns the claim on this land to a Company – real estate developer.



Indicators of suspicion specific to this typology:

- Transfers between natural persons and legal entities;
- Matching between receipts and payments;
- Substantial cash withdrawals.

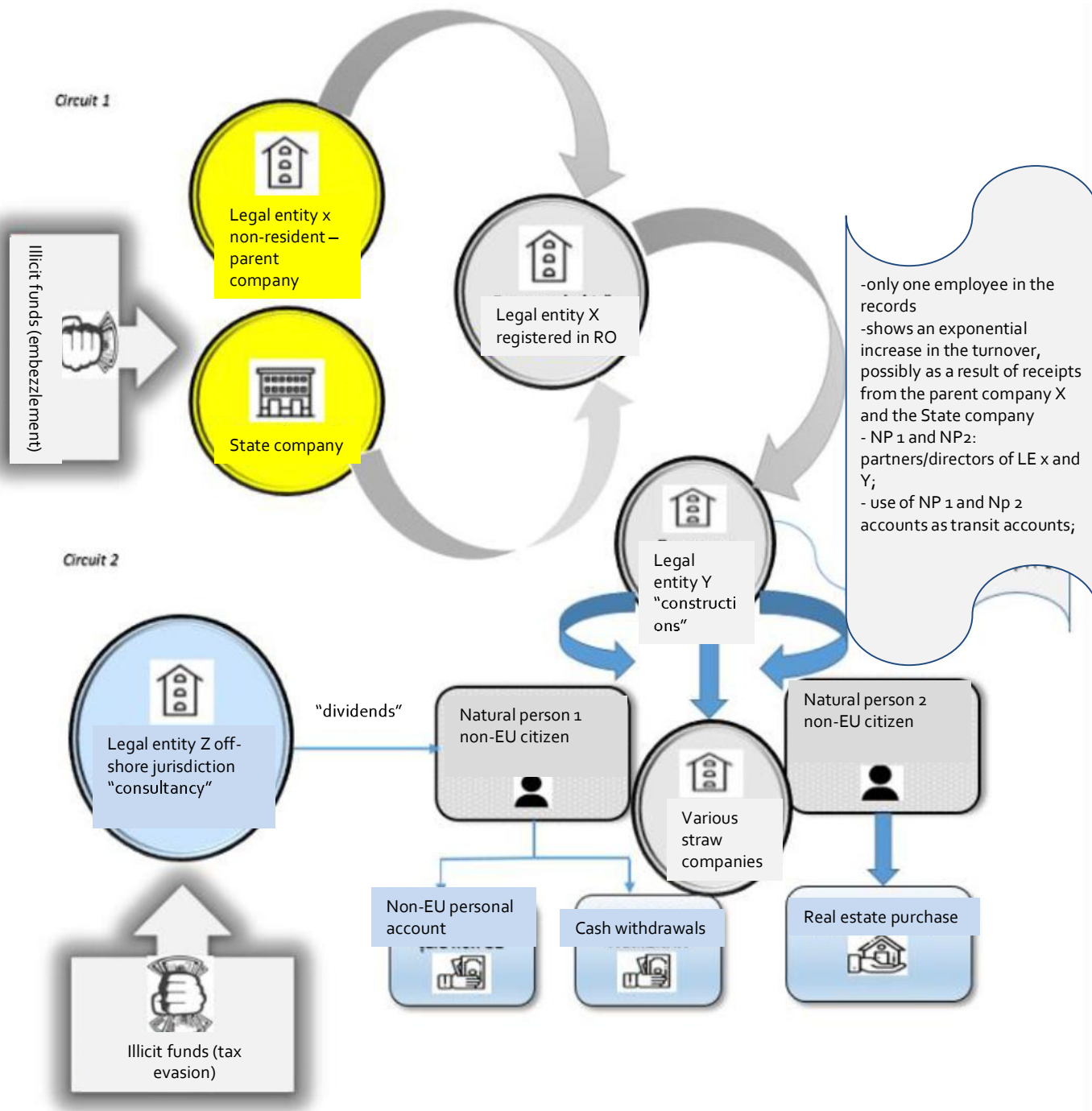
Case 4: (tax evasion and embezzlement)

Typology description:

Circuit 1: The illicit funds deriving from **embezzlement crime** were integrated into the legal financial circuit through operations that do not appear to have a real economic purpose, representing the transfer of funds deriving from a contract concluded with a state company to the account of **legal entity X** (registered in Romania), with explanations such as *"advance payment/invoice, provision of services"*, followed by transfers to the account of **legal entity Y** (*field of activity - construction*) with the explanation *"provision of services"*. Subsequently, the funds were transferred to possible *"straw partners"*, natural persons (**natural person 1 and 2 having the capacity of partners/administrators of legal entities X and Y**) with the explanation *"dividends"*, from where they were withdrawn in cash or used for the purchase of real estate, as well as to legal entities (including to the companies of the group, **legal entities X** - the parent company registered in a non-EU country and the one registered in Romania) with the explanation *"provision of services"*.

Circuit 2: Illicit funds deriving from the commission of the **tax evasion crime** on the territory of another state were integrated into the legal financial circuit by means of external transfers made from the account of a company registered in an offshore jurisdiction (**legal entity Z**), managed by **natural person 1** (non-EU citizen, also a Romanian citizen), to the accounts held by the same in Romania, with the explanation *"dividends"*, without any supporting documents being submitted. These operations were followed by external transfers to the personal account of **natural person 1** opened in a non-EU country, as well as successive cash withdrawals.

The proceeds of crime were thus transferred to natural persons and legal entities (used as intermediaries) through numerous operations and were ultimately laundered through **external transfers to personal accounts in a non-EU country, successive cash withdrawals** and the **purchase of real estate**.



Indicators of suspicion specific to this typology:

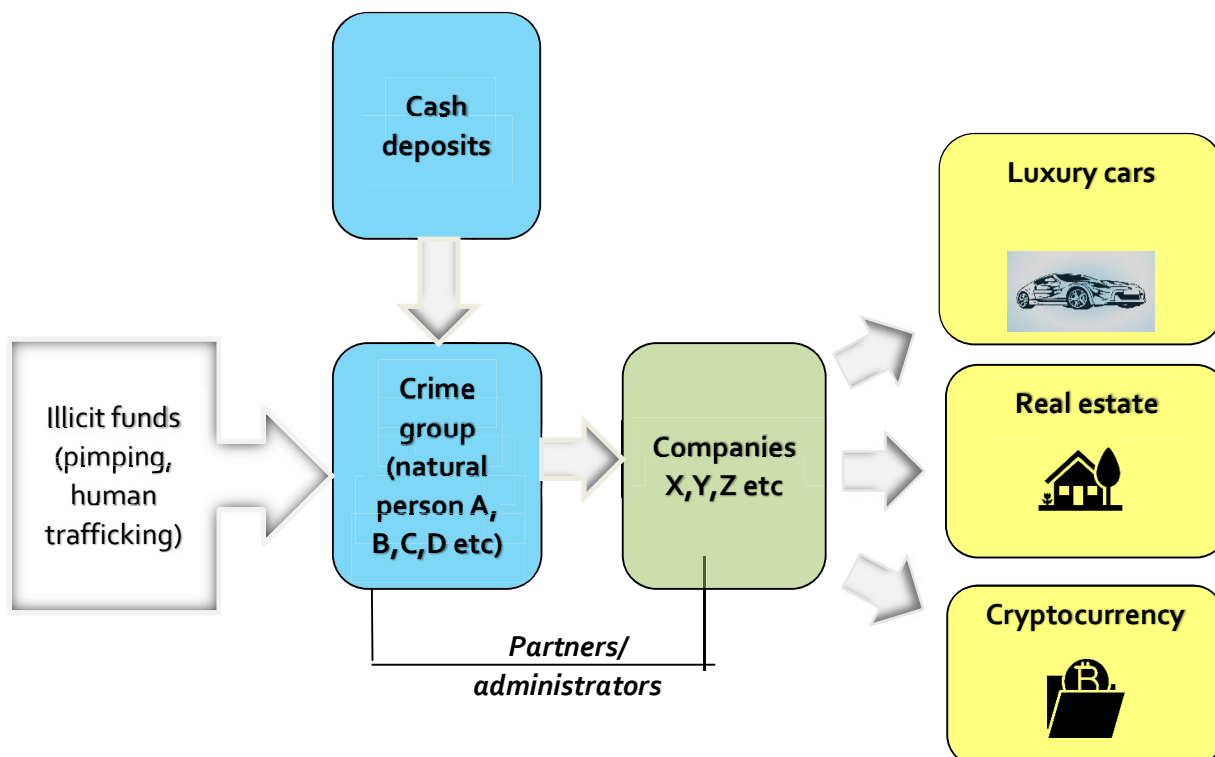
- **Circuit 1:** Transfer of funds that originated from a contract with a state company to the account of **legal entity X** (registered in Romania) with explanations such as *"advance payment/invoice, provision of services"*, followed by transfers with the explanation *"provision of services"* to the account of **legal entity Y** (field of activity - construction). Subsequently, the funds were routed with the justification *"provision of services, company loan, dividends"* and finalised by payment of real estate investments/cash withdrawals/transfers to possible intermediary partners/external transfers;
- The operations do not appear to have any real economic purpose, and may be a stage of "legitimising" funds which there are indications that they originated from a contract with a state company.

- The activity of **legal entity Y** "*construction*" is a vulnerable one, with a high risk of money laundering; it has only one employee during the period analysed;
- **Circuit 2:** Foreign receipts of significant amount from the **non-resident legal entity Z** registered in an off-shore jurisdiction carried out as "*own account transfer*" to the account opened in Romania of **natural person 1** (no supporting documents being present), followed by transfer to the personal account in a non-EU country and successive cash withdrawals;
- According to the information received from the partner FIU, the above transactions were considered suspicious following the identification of several red flags, namely the involvement of an off-shore jurisdiction, high value and round transactions, and the fact that one of the beneficiary banks reported these transactions as suspicious and closed the beneficiary's account;
- The business of the non-resident entity "*consultancy activities*" is a vulnerable one with a high risk of money laundering;
- Use of accounts held by **non-resident natural persons 1 and 2** (who are partners/administrators of **legal entities X and Y**) as transit accounts.

2. Funds deriving from the commission of crimes under Law 39/2003 on the prevention and combating of organised crime:

Case 1: (human trafficking, pimping) Laundering of money derived from the commission of crimes in several countries (human trafficking and pimping) through the purchase of luxury goods (cars, real estate etc.) and cryptocurrency.

Description of the typology: Funds derived from the commission of crimes (pimping, human trafficking etc.) were introduced into the financial circuit by means of cash deposits made by the holder of the account to other natural persons, followed by transfers to legal entities of which they are partners/directors. The funds were subsequently used to purchase luxury goods (cars and real estate) and cryptocurrency.



Indicators of suspicion specific to this typology:

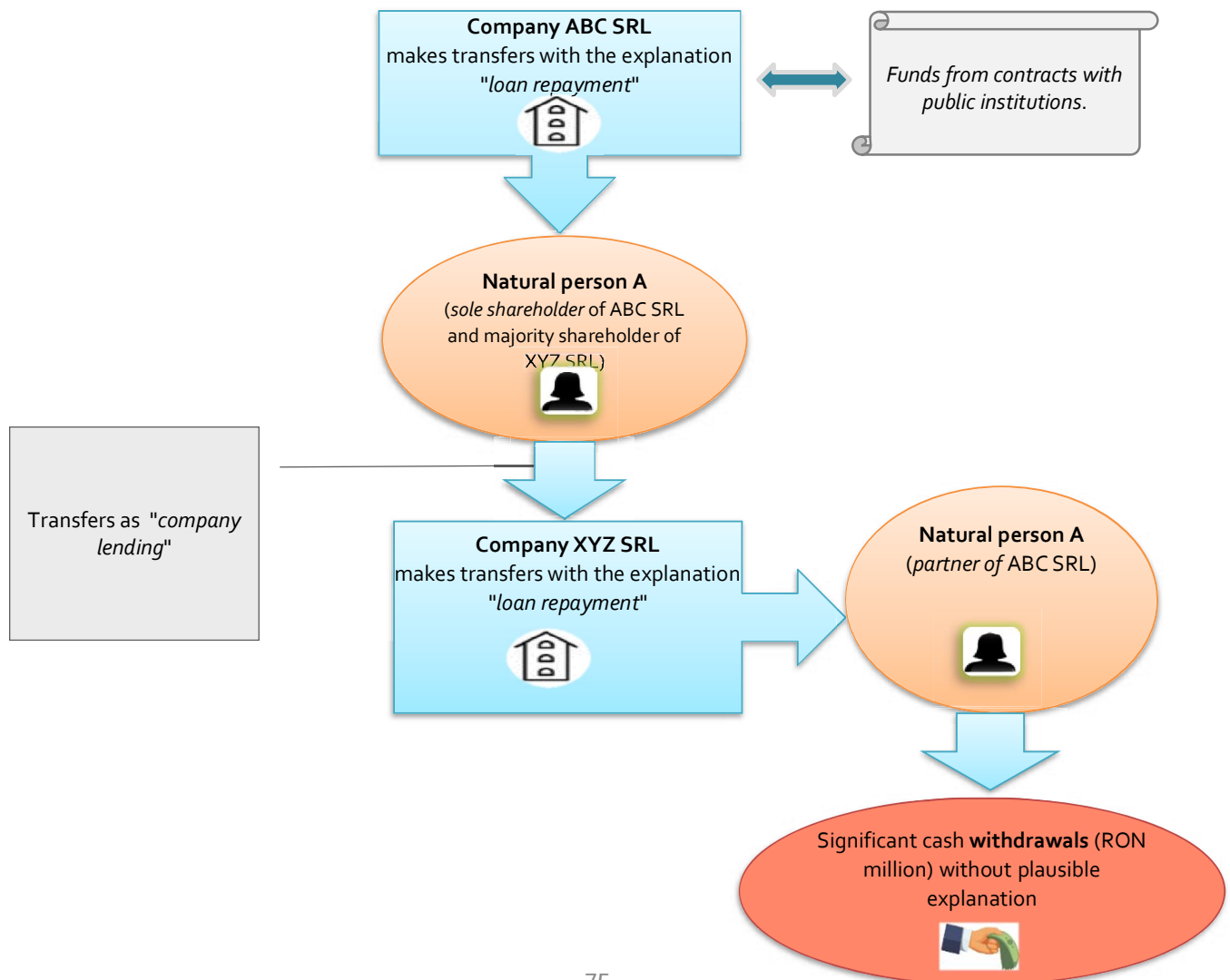
- Repeated cash deposits which do not match the profile of the natural persons involved;
- Use cash for trading instead of transfers;
- No legal sources have been identified for the funds deposited;
- Discrepancy between the declared transactional profile and the transactional activity carried out;
- The existence of criminal files describing the criminal activity of the individuals involved.

3. Funds derived from the commission of crimes provided for by Law 78/2000 for the prevention and punishment of corruption:

Case 1: (corruption crimes)

Description of the typology: Transfers of funds of significant value deriving from the commission of possible corruption crimes were integrated into formal financial circuits through the use of the accounts of legal entities and intermediary natural persons. The funds channelled through the created financial circuits originated from the account of ABC SRL, a company beneficiary of framework contracts concluded with public institutions, awarded by simplified procedure.

In the course of three calendar months, natural person **A** received from the company **ABC SRL**, where the same was the sole shareholder, sums running to RON millions with explanations such as "loan repayment". In the days immediately following, the funds were transferred, as "company loan", to another company of which natural person **A** was the majority shareholder. The amounts thus received were fully withdrawn.



Indicators of suspicion specific to this typology:

- The amounts traded do not match the profile and income level declared by the client;
- The source of funds behind the transactions is unclear;
- The company's turnover has increased unjustifiably from one year to the next (sudden increase to tens of RON millions, with only one employee);
- It is not known for what purpose the significant amounts of cash withdrawn in a short period of time were used.

Case 2: (corruption crimes)

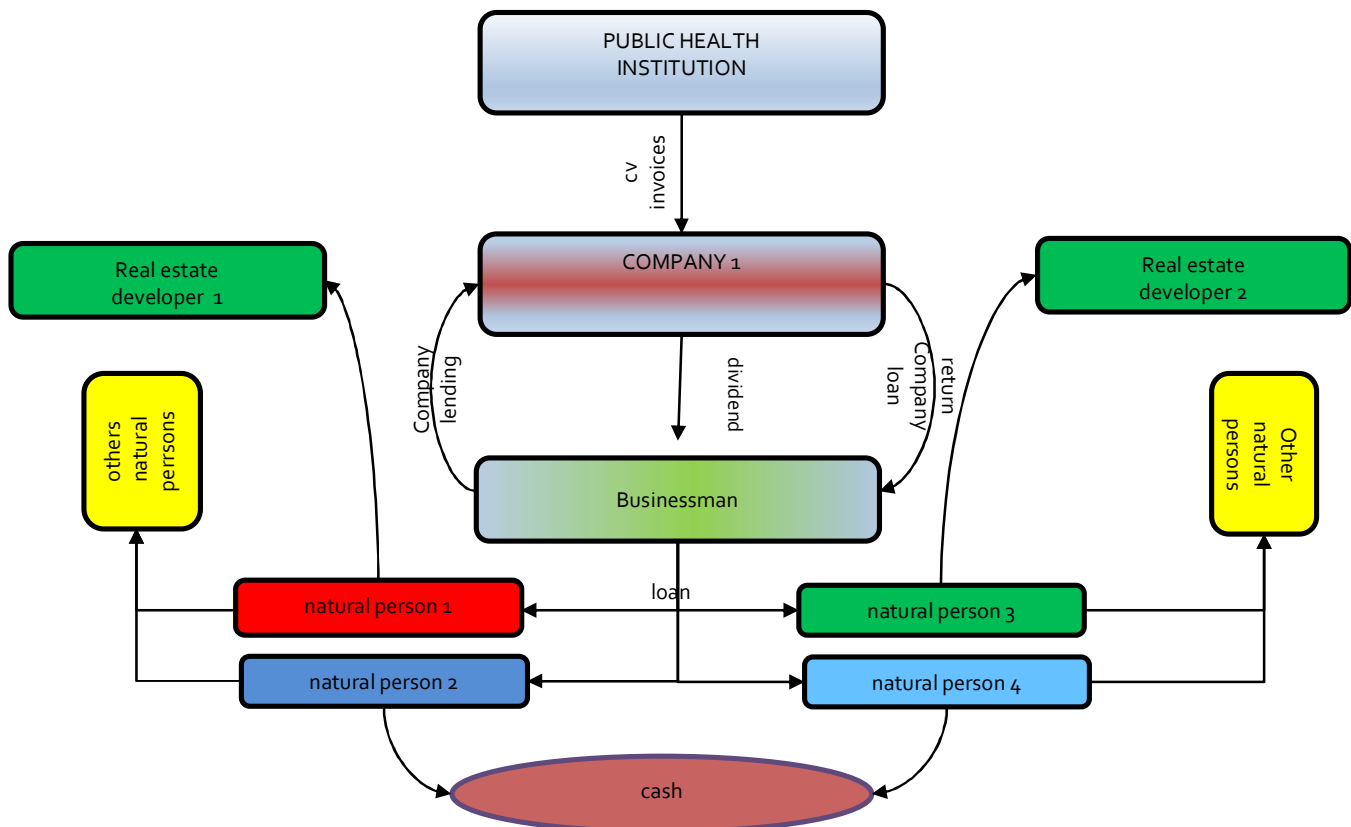
Description of typology: The funds originate from public procurement for which there are public signals that goods and services have been delivered to the public institution with reduced utility and at inflated prices.

The Office has received information from obliged entities about four individuals (NP₁, NP₂, NP₃ and NP₄) who have received substantial receipts in the form of loans, which do not appear to make economic sense (interest-free and with a very long repayment period - 5 years), from a businessman. In turn, the businessman has received these funds in the form of dividends from a company (SC₁), of which the same is the sole shareholder and which, in turn, receives its main receipts from public health institutions with funding received from the ATUs.

From the accounts of the four individuals, transfers were made to other individuals, also in the form of interest-free loans with long repayment terms, and to two property developers.

The four natural persons have atypical profiles: they are at the same time employees or former employees of certain companies in the healthcare sector as well as shareholders in certain companies with significant turnover.

The companies involved in these operations are characterised by the following features: they have achieved spectacular increases in turnover, despite having relatively few employees in relation to the activity reported.



Indicators of suspicion specific to this typology:

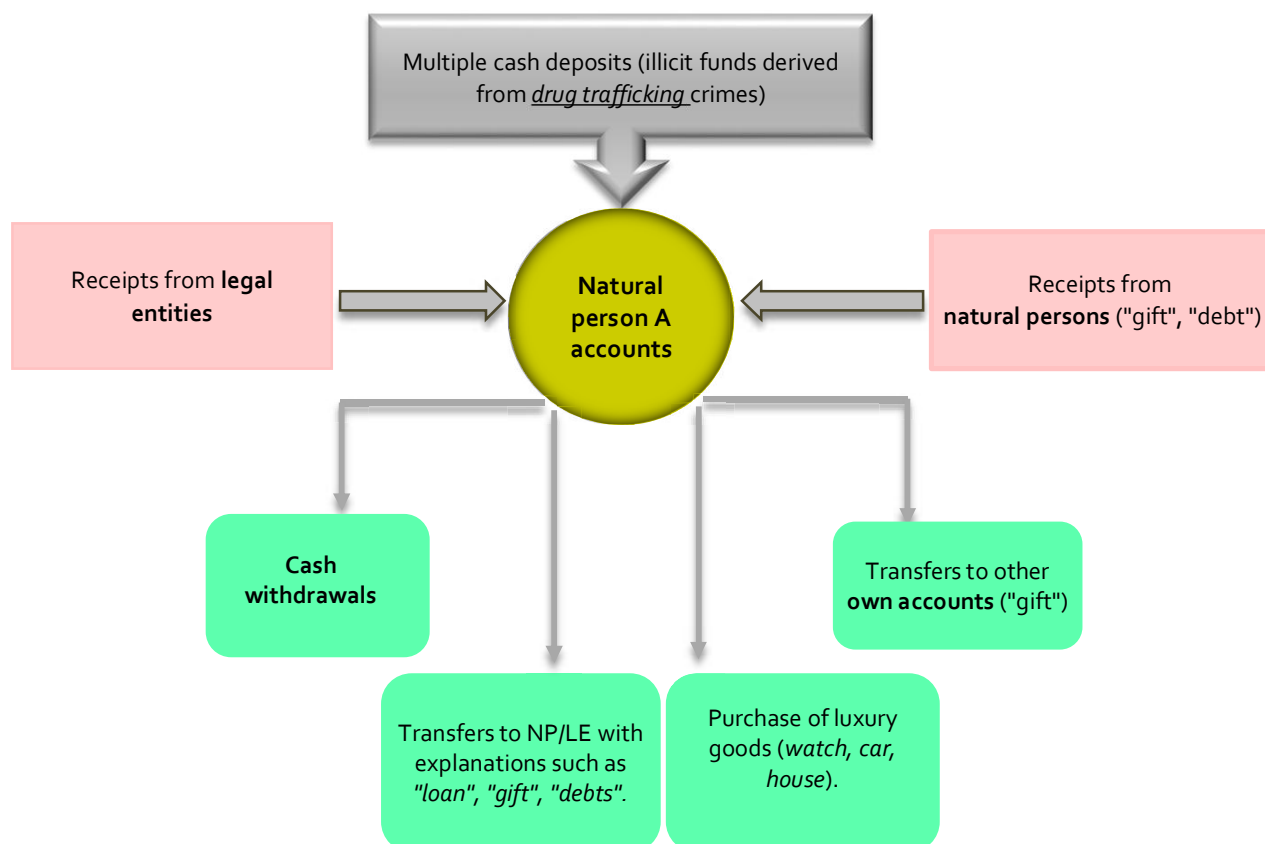
- Multiple receipts under loan contracts;
- Identifying negative media reports about these persons links to politicians;
- Substantial cash withdrawals.

4. Funds deriving from the commission of crimes provided for by *Law 143 / 2000 on combating trafficking and illicit drug use*:

Case 1: (trafficking and illicit drug use)

Description of the typology: During one calendar year, *natural person A* created a financial circuit in order to introduce into the financial circuit funds derived from the drug trafficking crime. The sums transited the accounts held by *natural person A* with two Romanian banks, as well as the accounts of other individuals, without any supporting documents being produced. Some of the funds involved in these transactions were introduced into the financial circuit through cash deposits, realised through multiple operations, the origin of which could not be justified.

The financial circuits created were cash withdrawals, the purchase of luxury goods from various traders (luxury brand electric car, watch, house), payments to various natural persons and legal entities with explanations such as "loan", "gift", "debt", as well as transfers to other own accounts held with other banks.



Indicators of suspicion specific to this typology:

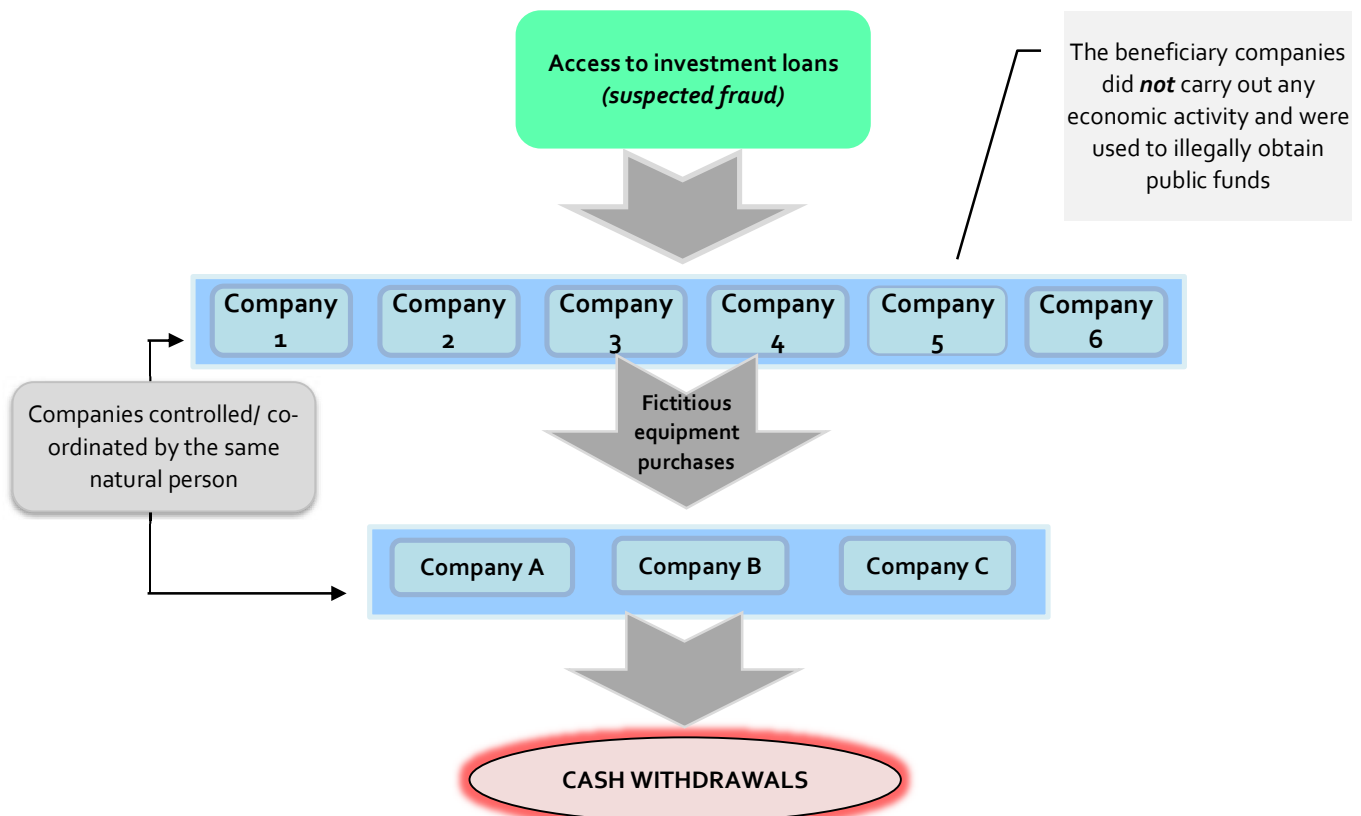
- Frequent cash deposits of significant cumulative value;
- Unclear source of funds received;
- Using cash received/dispensed to purchase luxury goods;
- The rapid transfer of funds collected on own account held with another bank in Romania for the purpose of stratifying funds deposited in cash below the reporting limit;
- Creation of a circuit of funds: amounts transiting through the accounts held by individual A at several banking establishments in Romania, as well as through the accounts of other individuals (transactions without supporting documents), which leads both to the concealment of the origin of the funds and to the impossibility to trace their final destination;
- Natural person under investigation for domestic and foreign drug trafficking crimes.

5. Laundering of funds derived from crimes under the Criminal Code:**Case 1:**

Description of the typology: Funds derived from fraudulent access to investment loans obtained by six companies were channelled through fictitious purchases from several companies controlled by the same person.

Thus, the money obtained by the six companies from accessing investment loans was transferred to the accounts of other companies (controlled/coordinated by the same individual) on the basis of invoices for equipment purchases, most of the transactions being explained as "transfer", "advance", without the goods that were the subject of these purchases actually being the goods themselves. In the end, a large part of the funds transferred were withdrawn in cash from the accounts of the companies supposedly supplying the equipment.

The analysis revealed that the companies receiving the loans did not carry out any economic activity, but only used them to illegally obtain funds. Furthermore, companies A, B, C do not appear with declarations on intra-community/domestic supplies/performances/purchases or balance sheet information submitted.

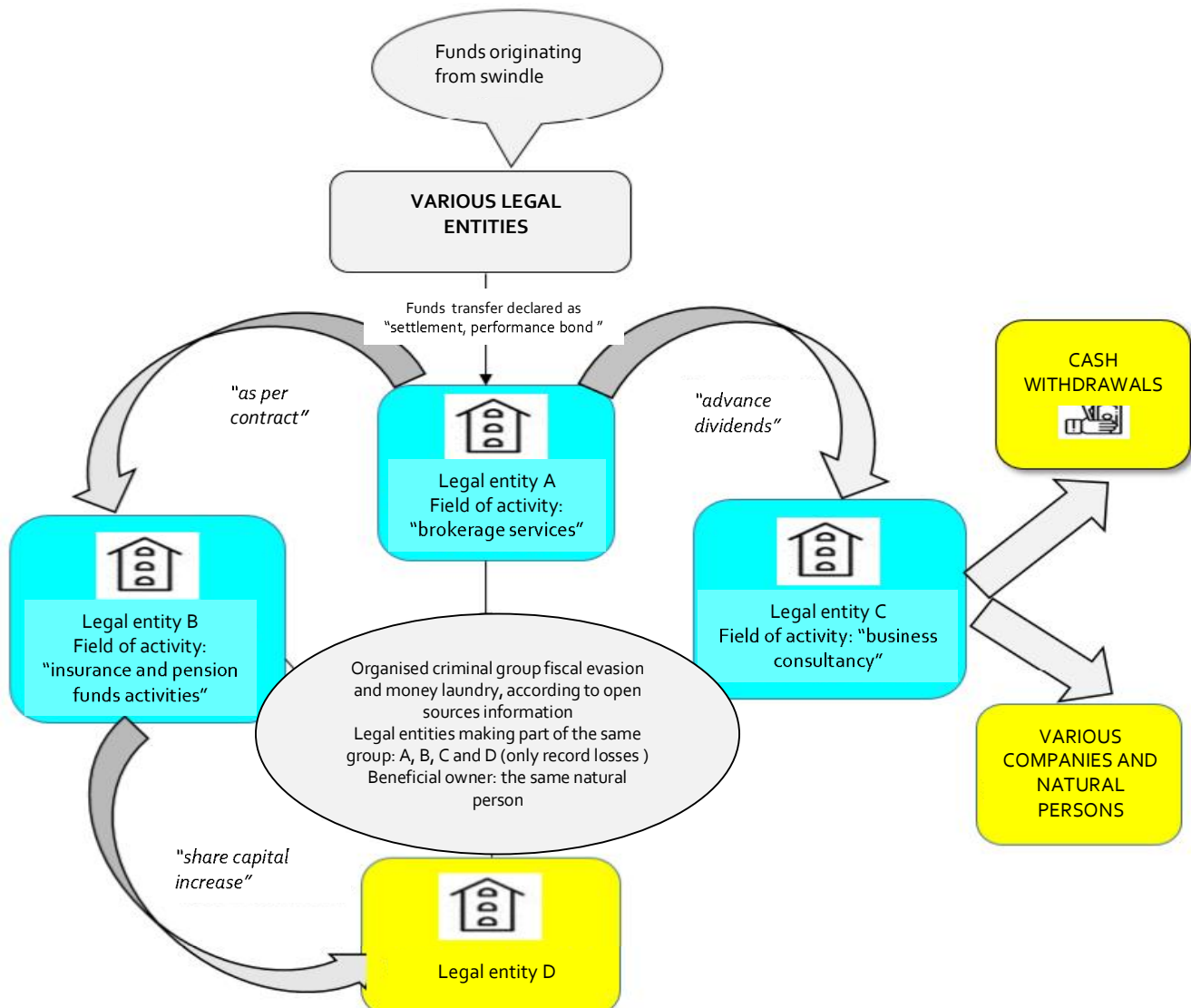


Indicators of suspicion specific to this typology:

- The loan documentation was brought to the bank via a financial adviser;
- Rapid transfer of investment loan proceeds to companies controlled by the same person;
- It is suspected that the transactions were carried out on the basis of fictitious invoices and the goods were overpriced;
- There is a suspicion that the transactions carried out have no real economic purpose and that the real beneficiary of the credit sums is another person;
- Complex transactional circuit between companies registered in different counties.

Case 2:

Description of the typology: funds derived from the commission of offences (fraud) were repeatedly transferred through the accounts of legal entities belonging to the same group (according to open sources information, the persons involved were being investigated in criminal cases for the crimes of setting up an organised criminal group for tax evasion and money laundering), accompanied by explanations such as "settlement, performance bond", financial circuits that did not appear to have an economic purpose. The receipts were then followed by payments either to various natural persons or to various legal entities belonging to the same group and controlled by the same natural person, declared as "dividends, services as per contract, brokerage services", and cash withdrawals.



Indicators of suspicion specific to this typology:

- Receipt of a large amount in the form of "advance dividends" on behalf of a company that has only recorded losses and for which no documents have been provided to the reporting entity to justify the reality of these dividends;
- The transactions have no real economic purpose and do not correspond to a normal trading pattern;
- Transfers between related accounts or accounts having beneficial owners/legal representatives of related persons;
- The companies involved and the related partners operate in areas considered vulnerable, with high-risk for money laundering;
- Negative media reports and investigations in criminal cases have been identified in relation to the companies involved, partners and persons owning/controlling the company;
- The existence of negative information in the online environment about the group of companies involved (companies specialising in loans and guarantees for businesses) and the prohibition of lending activity due to irregularities identified in the issuing of letters of guarantee;
- Lack of supporting documents for the transactions carried out;
- Repeated cash withdrawals without economic sense.

❖ **CROSS-BORDER CASH DECLARATIONS**

According to Regulation (EU) 2018/1672 of the European Parliament and of the Council of 23 October 2018 on controls of cash entering or leaving the Union and repealing Regulation (EC) No 1889/2005, bearers carrying cash of EUR 10,000 or more are obliged to declare that cash to the competent authorities of the Member State through which they enter or leave the Union and make the cash available for control.

As it is known that cash is often used in criminal activities worldwide, the Office has regularly carried out strategic analyses on the declarations of cash that transited Romania's border crossing points, which were finalised by sending information to the authorities.

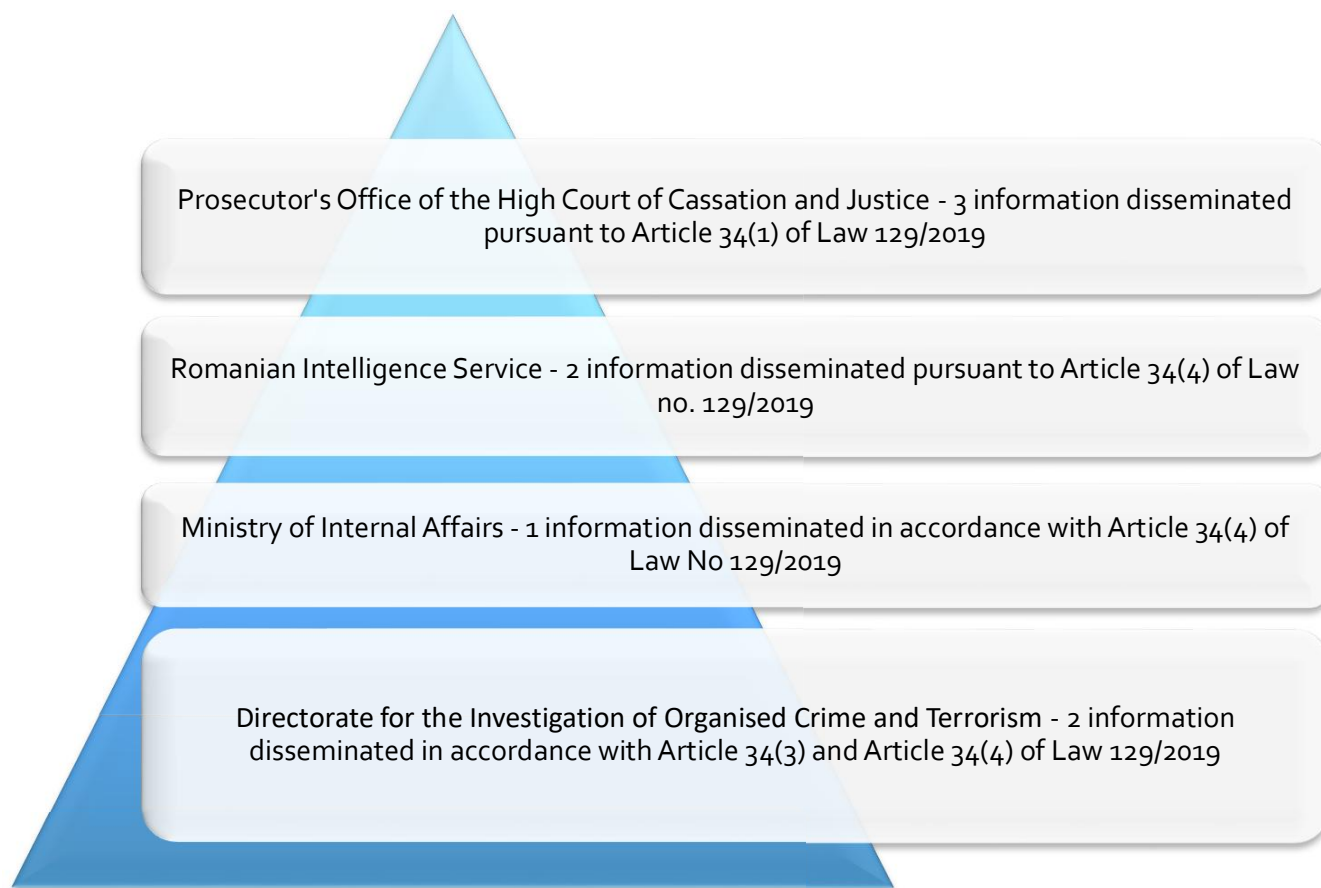
From the statistical analysis of cash declarations submitted by individuals when entering and exiting the EU area through Romania's border crossing points, it emerged that the following cash declarations were registered in the period 2022 - 2024:

Year	No. of declarations upon entry into the EU area through Romanian border crossing points	Total amount (thousand EUR)	No. of declarations when exiting the EU area through Romanian border crossing points	Total amount (thousand EUR)
2022	2869	389,421	366	28,162
2023	1862	503,641	262	191,848
2024	3101	828,665	558	169,295

With regard to the analysis of cash declarations submitted upon **entry into the EU** through Romania's border crossing points, it should be noted that in 2023 there was a decrease in the number of cash declarations by approximately 35.1% compared to 2022, although the value of transited funds increased by 29.33%, and in 2024 there was an increase in the number of cash declarations by approximately 66.54% and in the value of transited funds by approximately 64.53% compared to the previous year.

With regard to the analysis of cash declarations submitted when **exiting the EU** through Romania's border crossing points, it can be noted that in 2023 there was a decrease in the number of cash declarations by approximately 28.42% compared to 2022, although the value of transited funds increased by 581.23%, and in 2024 there was an increase in the number of cash declarations by approximately 112.98% compared to the previous year, although the value of transited funds decreased by approximately 11.76%.

- ❖ **The strategic analyses carried out in 2024** on the identification of recurring patterns/typologies of money laundering were finalised by disseminating, in accordance with the provisions of Law 129/2019, eight information to the following recipients:



For three of these cases, spontaneous information was also sent to partner Financial Intelligence Units.

STATISTICAL ANALYSIS

This chapter presents statistical reports on cash transactions, foreign transfers and funds transfers for money remittance activity reported to the NOPCML for the period 01.01.2024 - 31.12.2024 by the obliged entities.

I. CASH DEPOSITS / WITHDRAWALS > EUR 10,000

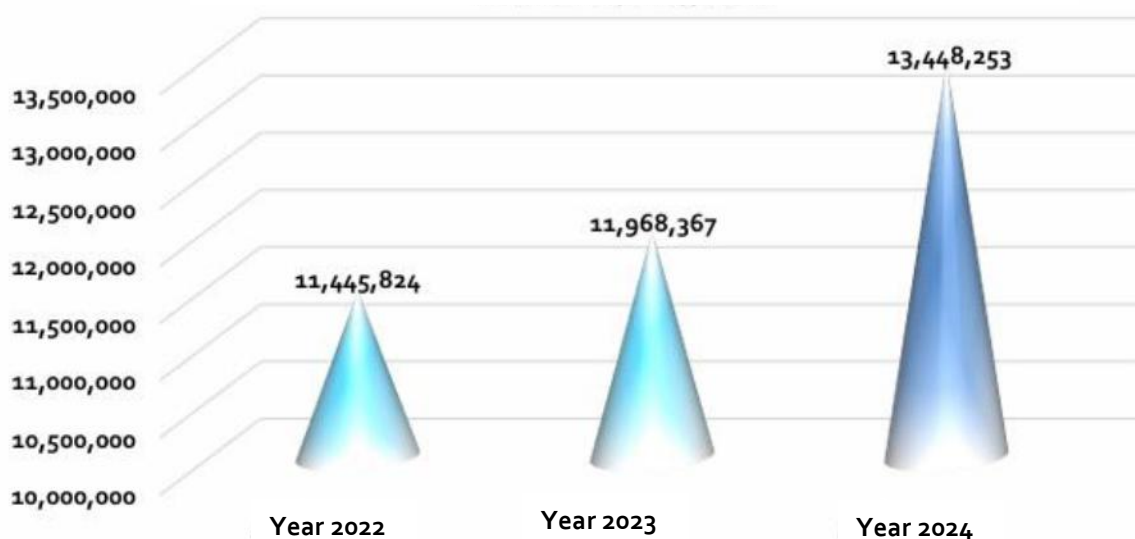
The ONPCSB databases contain 29,656 reports of cash transactions reported to the NOPCML by the obliged entities during the period 01.01.2024 - 31.12.2024.

The 29,656 reports contain a total number of 13,448,253 transactions of which: 11,543,950 were cash deposit transactions totalling EUR 60,862,638,914 and 1,904,303 represent cash withdrawal transactions totalling EUR 22,311,087,742. The main obliged entities are specialised entities carrying out foreign exchange activities, with 10,278 reports, followed by banks with 5,071 reports, providers of land-based gambling services - slot machines - with 3,279 reports, notaries public with 2,390 reports, credit unions with 2,180 reports, pawnshops with 1,672 reports, providers of land-based gambling services - casino - with 1,276 reports, etc.

Dynamics of the number of reports and number of cash transactions reported to the NOPCML between 2022 and 2024

Tracked data	Year 2022	Year2023	Year2024
No. of reports	16,210	14,690	29,656
Total no. of operations	11,445,824	11,968,367	13,448,253

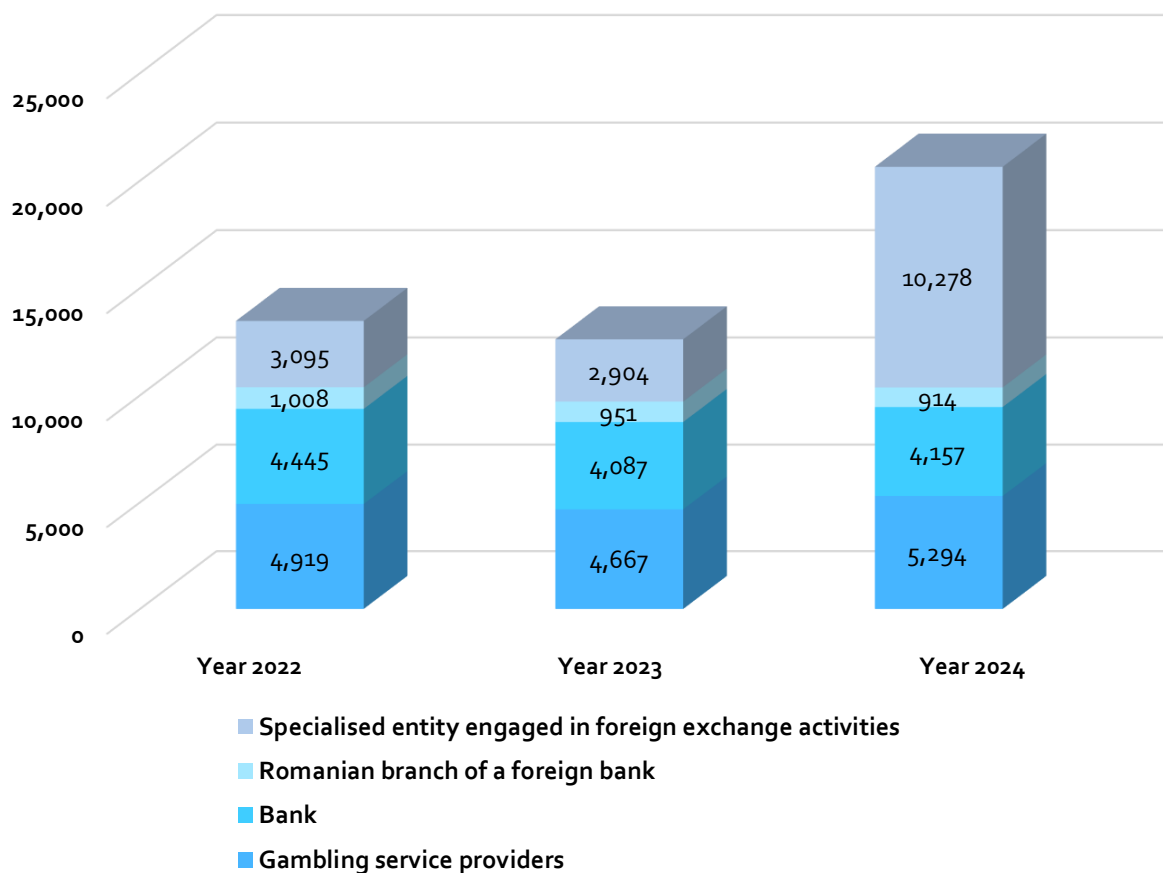
Dynamics of the number of cash transactions reported to the NOPCML in 2022, 2023, 2024



The dynamics of the number of cash transaction reports reported to the NOPCML over the period 2022-2024, by main types of obliged entities

Reporting entity type	Year 2022	Year 2023	Year 2024
Bank	4,445	4,087	4,157
Romanian branch of a foreign bank	1,008	951	914
Gambling service providers	4,919	4,667	5,294
Specialised entity engaged in foreign exchange activities	3,095	2,904	10,278

The dynamics of the number of cash transaction reports recorded in between 2022-2024, by main types of obliged entities



Below is the development and structure of the number of transactions and amounts deposited and withdrawn on the accounts of individuals and legal entities, reported to the NOPCML in the period 2022-2024:

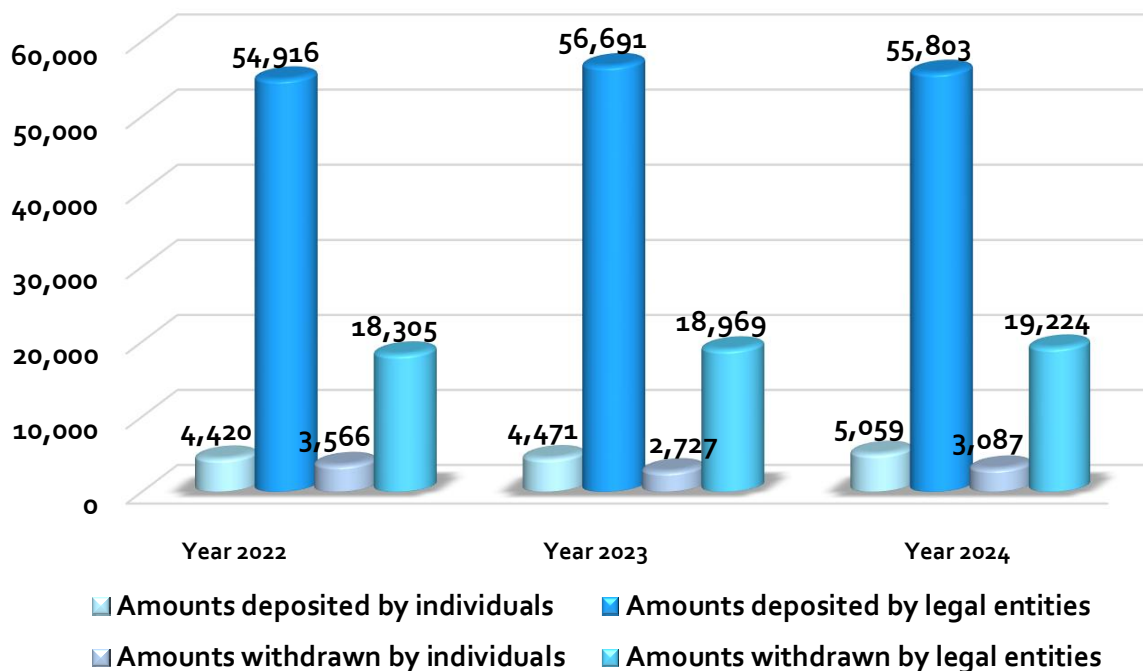
Number of cash deposit/withdrawal transactions by natural persons/legal entities reported to the NOPCML in the period 2022 - 2024

Tracked data	Year 2022	Year 2023	Year 2024
Deposit operations natural persons	386,019	397,308	505,363
Deposit operations legal entities	8,907,708	9,562,514	11,038,588
Total cash deposit operations	9,293,727	9,959,822	11,543,951
Withdrawal operations natural persons	539,795	485,069	610,382
Withdrawal operations legal entities	1,612,302	1,523,476	1,293,921
Total cash withdrawals	2,152,097	2,008,545	1,904,303

**Amounts traded in cash reported to the NOPCML between 2022 and 2024
- million EUR -**

Tracked data	Year 2022	Year 2023	Year 2024
Amounts deposited natural persons	4,420	4,471	5,059
Amounts deposited legal entities	54,916	56,691	55,803
Total amounts deposited	59,336	61,162	60,862
Amounts withdrawn natural persons	3,566	2,727	3,087
Amounts withdrawn legal entities	18,305	18,969	19,224
Total amount withdrawn	21,871	21,696	22,311

Dynamics of the amounts traded in cash, reported to the NOPCML over the period 2022-2024 (million EUR)



Total number of cash deposit/withdrawal transactions broken down by transactions in national and foreign currency - mil. operations-

Year 2022			Year 2023			Year 2024		
TOTAL transactions	National currency	Foreign currency	TOTAL transactions	National currency	Foreign currency	TOTAL transactions	National currency	Foreign currency
11,4	10,8	0,6	11,9	11,3	0,6	13,4	12,8	0,6

II. EXTERNAL TRANSFERS > EUR 10.000

The NOPCML's databases contain 8,429 reports of foreign transfers to and from accounts in Romania, submitted to the NOPCML by the obliged entities in the period 01.01.2024 - 31.12.2024, covering 8,271,746 operations.

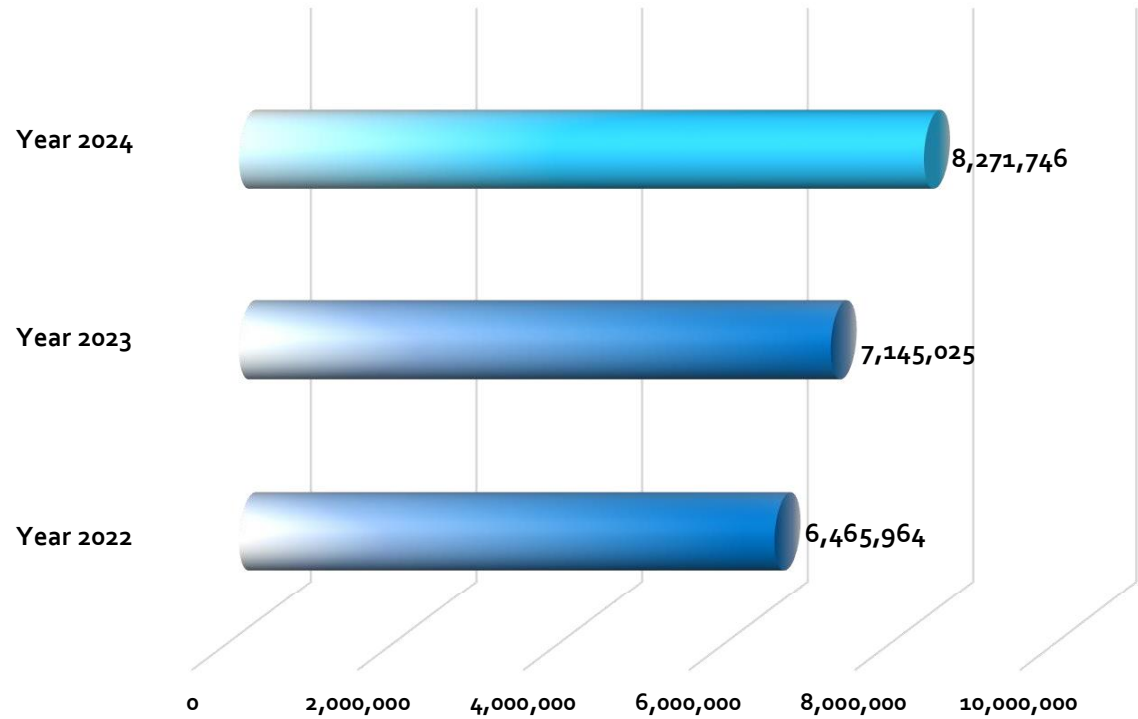
The 8,429 reports contain a total number of 8,271,746 transactions of which 3,481,950 were external receipts transactions totalling EUR 1,613,294,572,360 and 4,789,796 were external payments transactions totalling EUR 1,656,270,593,158.

The main obliged entities are: banks - 6,024 reports, followed by insurer/reinsurer - 686 reports, financial investment services companies - 572 reports, investment management companies - 452 reports, non-banking financial institutions - financial leasing - 227 reports, Romanian branch of a financial institution - 154 reports, electronic money institutions - 106 reports.

Dynamics of the number of reports and the number of external transfers reported to the NOPCML between 2022 and 2024

Tracked data	Year 2022	Year 2023	Year 2024
Number of reports	6,923	6,051	8,429
Total number of operations	6,465,964	7,145,025	8,271,746

Dynamics of the number of external transfers reported to the NOPCML in 2022, 2023, 2024

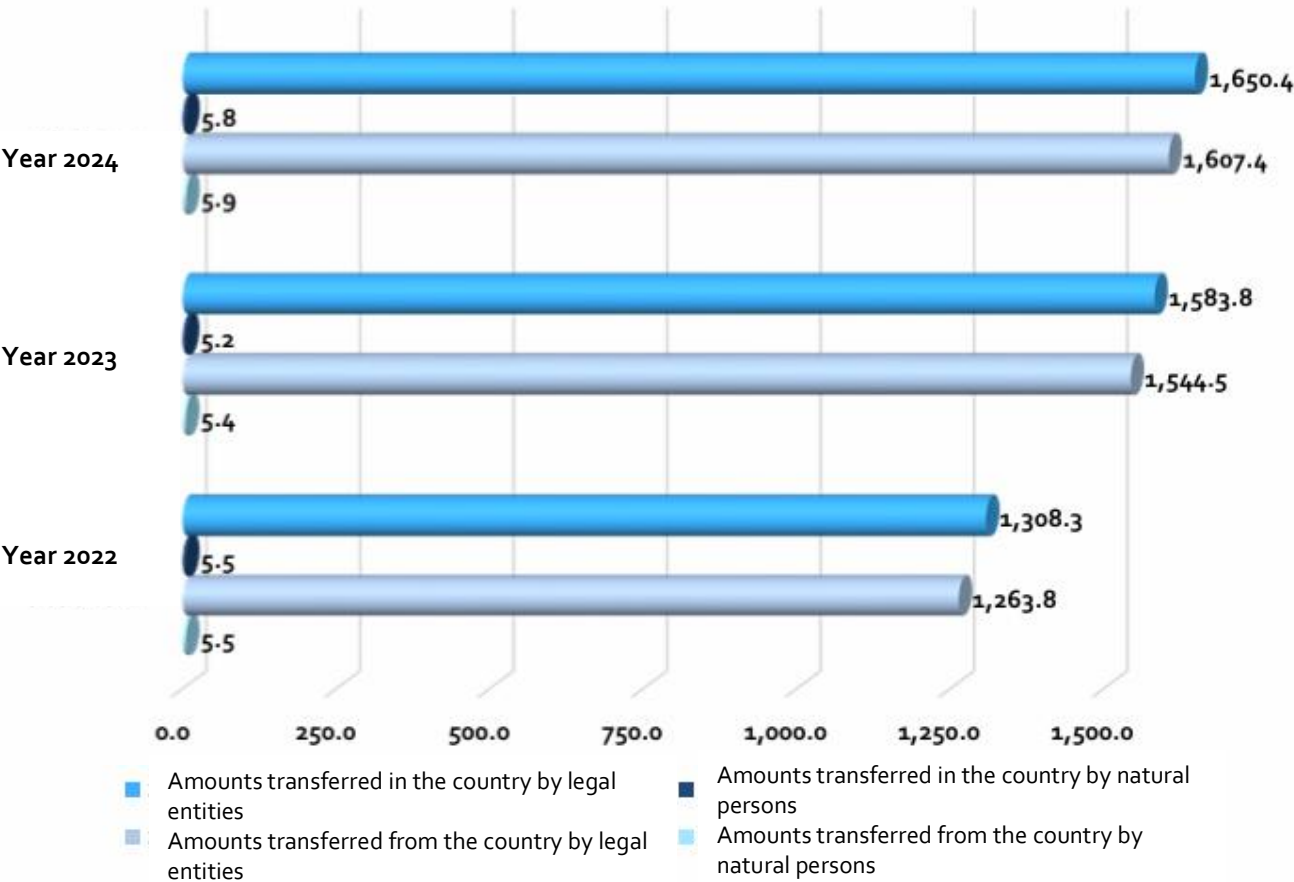


The following shows the development and structure of foreign receipts and payments made by natural persons/legal entities, reported to the NOPCML in 2022, 2023, and 2024.

Amounts transferred in/from Romania reported to the NOPCML between 2022 and 2024
- billion EUR -

Tracked data	Year 2022	Year 2023	Year 2024
Amounts transferred in the country by natural persons	5.5	5.4	5.9
Amounts transferred in the country by legal entities	1,263.8	1,544.5	1,607.4
Total amounts transferred in the country	1,269.3	1,549.9	1,613.3
Amounts transferred from the country by natural persons	5.5	5.2	5.8
Amounts transferred from the country by legal entities	1,308.3	1,583.8	1,650.4
Total amounts transferred from the country	1,313.8	1,589.0	1,656.2

Dynamics of external receipts and payments reported to the NOPCML in 2022–2024 (billion EUR)



**Total number of external transfers broken down by operations
in national currency and foreign currency operations
- million operations-**

Year 2022			Year 2023			Year 2024		
TOTAL transactio ns	National currency	Foreign currency	TOTAL transactio ns	National currency	Foreign currency	TOTAL transactio ns	National currency	Foreign currency
6.5	2.5	4.0	7.1	3	4.1	8.3	3.7	4.6

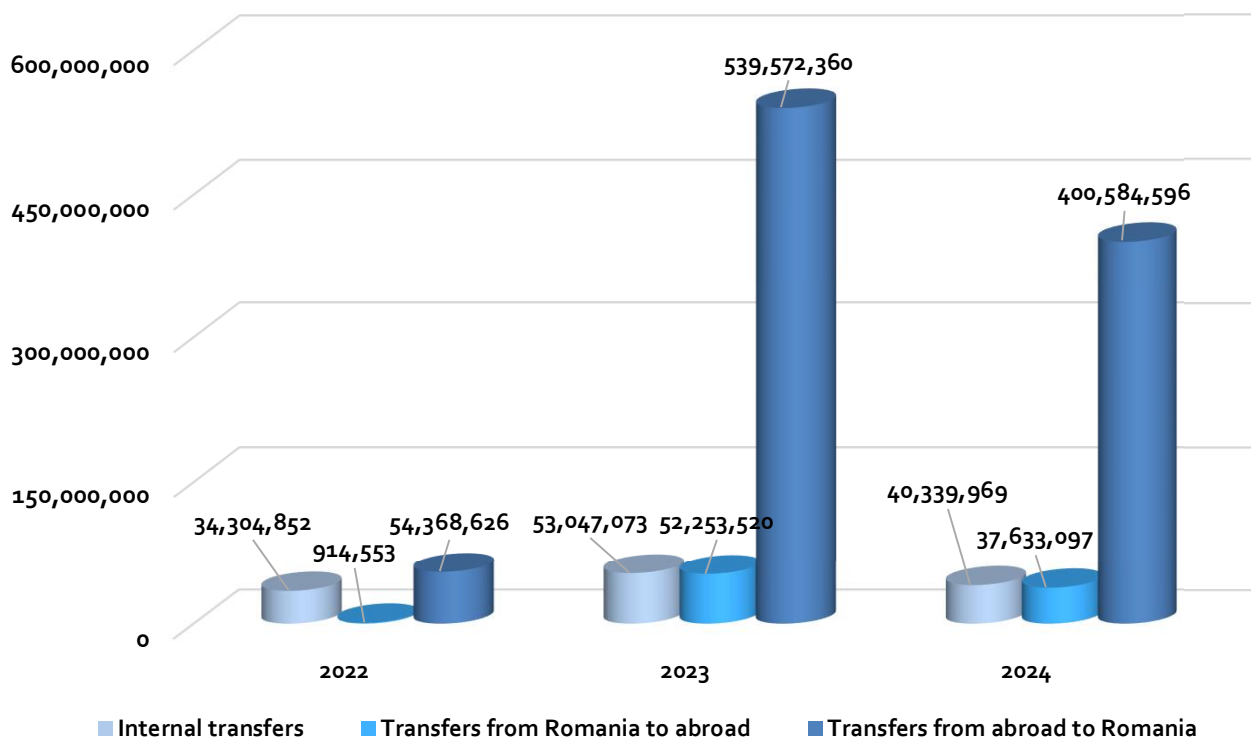
III. FUNDS TRANSFERS FOR MONEY REMITTING ACTIVITY > EUR 2.000

The ONPCSB's databases contain 1,517 fund transfer reports for money remittance activity, submitted to the NOPCML between 01.01.2024 - 31.12.2024, by obliged entities, containing 181,056 operations, totaling EUR 478,557,662.

Funds transfers for money remitting activity reported in 2022, 2023, 2024

Tracked data	Year 2022		Year 2023		Year 2024	
	Number of operations	Amount (EUR)	Number of operations	Amount (EUR)	Number of operations	Amount (EUR)
Internal transfers	10,042	34,304,852	14,484	53,047,073	12,451	40,339,969
Transfers from Romania to abroad	384	914,553	16,636	52,253,520	13,918	37,633,097
Transfers from abroad to Romania	26,954	54,368,626	211,380	539,572,360	154,687	400,584,596
TOTAL	37,380	89,588,031	242,500	644,872,953	181,056	478,557,662

Structure and dynamics of amounts representing funds transfers for money remitting activity reported for the period 2022 - 2024



IV. PROVIDING FEEDBACK FOLLOWING SUSPICIOUS TRANSACTION REPORTS

The NOPCML provided, on a quarterly basis, feedback to the obliged entities, prudential supervisors and self-regulatory authorities under whose jurisdiction the obliged entities fall, on the effectiveness and actions taken by them, following the suspicious transaction reports received in 2024, with 361 letters and related statistical statements being prepared and submitted, as follows:

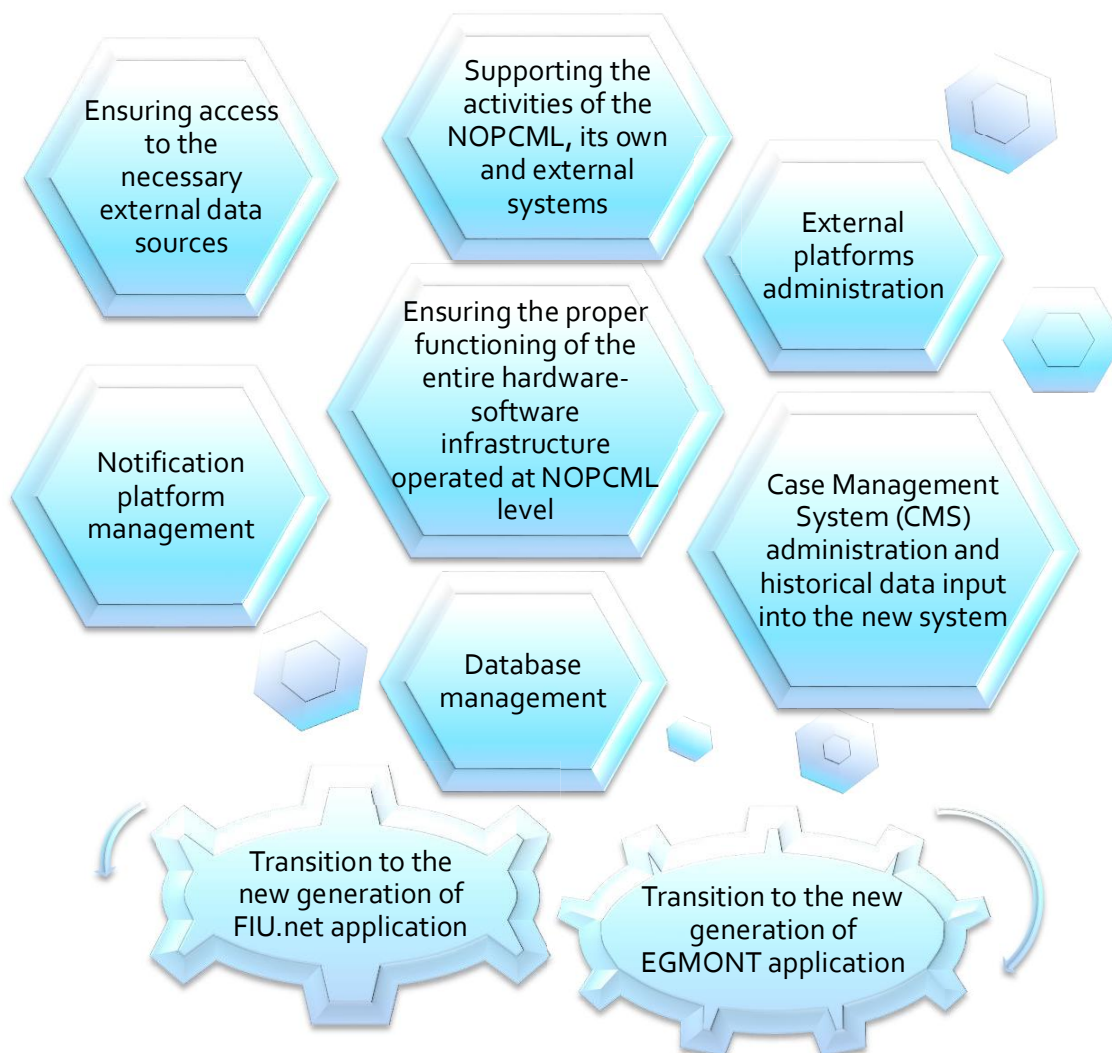
Beneficiaries	Number of feedback letters			
	Quarter I	Quarter II	Quarter III	Quarter IV
Obliged entities	73	86	89	86
Prudential supervisors and self-regulatory authorities	5	5	6	7
TOTAL	78	91	95	93

V. PROVIDING, UPON REASONED REQUEST OF THE NATIONAL BANK OF ROMANIA/ THE FINANCIAL SUPERVISORY AUTHORITY, THE INFORMATION HELD BY THE OFFICE, IN ACCORDANCE WITH ITS LEGAL DUTIES

Pursuant to Article 33 para. (6) of Law 129/2019, in order to fulfil the legal obligations incumbent upon the National Bank of Romania and the Financial Supervisory Authority, the NOPCML shall provide, upon their reasoned request, information on persons and entities that have associated risk of money laundering and terrorist financing.

Tracked data	Year 2022	Year 2023	Year 2024
Number of requests from NBR / FSA	108	102	141
Number of natural persons subject to requests	359	521	499
Number of legal entities subject to requests	252	399	265

INFORMATION TECHNOLOGY SERVICE



IT support**trainings**

- Creating webinars and publishing them on the website
- Panellist support, report generation

Participation**active**

- Training of obliged entities on the online reporting system
- Telephone support for obliged entities and users

Presence**web**

- Improving and updating your web presence
- Advanced technologies
- Web accessibility



The main attributes of the new system include:

- complete solution for managing the processes of data collection (reports, information and requests) - processing - analysis - dissemination - statistics - archiving;
- capabilities to take data from the obliged entities' IT systems efficiently, securely and consistently through web services and API (Application Programming Interface) with data translation, firewall and access control functionalities;
- capabilities for automatic electronic recording of all reports submitted by obliged entities in special electronic registers;
- implementation of electronic distribution/approval/signing workflows to eliminate the circulation of documents in letter format in the organisation;

- Extract-Transform-Load (ETL) capabilities to extract, process, validate and load data into a data warehouse;
- connection capabilities to national databases or registers held by public institutions in Romania through web services and API (Application Programming Interface) with data translation, firewall and access control functionalities;
- search capabilities in data sources that do not have APIs or other standard connectors;
- capabilities to monitor transactions reported by legally obliged entities in order to identify suspicions of money laundering and terrorist financing in accordance with defined detection scenarios;
- generating a single alert based on the aggregation of results for a natural/legal person entity by combining detection scenarios. This will provide an overview of the natural/legal person by aggregating the scenarios and risk factors, thus allowing analysts to make decisions based on the identified risk;
- allows analysts to conduct targeted searches on money laundering/terrorist financing;
- features fuzzy search algorithms to allow analysts to identify all potential matches (including transliterations, misspellings, typos and phonetic transcriptions) in a browser interface or to configure detection scenarios for data monitoring;
- Full text indexing capabilities of documents attached to suspicious transactions;
- Graphical network diagram capabilities to display entities and financial flows, including geospatial information (overlaid on a map);
- eliminating the manual operations required to process the reports received daily from the obliged entities and to enter them into the Office's databases;
- electronic management of control and supervision processes.

SECRETARIAT, REGISTRY, ARCHIVE DEPARTMENT

- ❖ The reception and dispatch of documents, in letter and electronic format, was ensured via postal services, courier services, the Office's secure networks (FIU.NET, EGMONT, EXTRANET, email, fax).
- ❖ The following were managed and registered through the CSRA:

589	documents registered in the CONFIDENTIAL REGISTER STR (requests for information, spontaneous information);
2253	documents recorded in the CONFIDENTIAL REGISTER (feedback, closure order, criminal convictions, replies relating to DAPI, DCSITF work)
2957	documents recorded in the UNCLASSIFIED REGISTER
13	documents recorded in the INTERNAL CONFIDENTIAL REGISTER
654	documents recorded in the INTERNAL UNCLASSIFIED REGISTER
4	documents recorded in the DAPI's INTERNAL CONFIDENTIAL REGISTER

- ❖ A total of 2399 works were sent by special (military) mail, for which 373 delivery slips were issued;
 - The dispatch situation has been updated with 1701 works;
 - Copies 2 of the dispatched works (2399), were scanned into ELO, forwarded to the financial analysts and handed over via the appropriate record.
- ❖ A total of 151 works have been dispatched through CNPR, for which 48 delivery slips have been drawn up;
- ❖ 1420 papers have been sent by fax, email, delegate;
- ❖ The reproduction of documents through the registry and secretariat was ensured;
- ❖ Approx. 2500 telephone calls from outside the institution were handled;
- ❖ The handing over of documents to directorates within the institution has been ensured according to the resolution of the President/Vice-President;
- ❖ In the period January - May 2024, according to the contract, 2187 boxes were handed over for scanning and archive processing and 2109 boxes were returned to NOPCML;
- ❖ The planning and organisation of the boardrooms was ensured;
- ❖ Preparation and organisation of logistics for internal meetings and events;
- ❖ The improvement of the SIIAI has been ensured as assigned;
- ❖ Internal hearings were organised in the offices of the heads of the institutions;
- ❖ The NOPCML employees were welcomed and assisted.

LEGAL ACTIVITY

1. Analysing and endorsing for legality the draft regulatory acts initiated by the Office through the Ministry of Finance and carrying out the legislative procedures necessary for their entry into force, including by supporting these drafts before the public authorities and within the specialised committees of the Parliament.

a) In 2024, the Office initiated and realised the necessary legislative procedures for the entry into force of the following regulatory acts:

- ❖ Order of the President of the National Office for Prevention and Control of Money Laundering no. 41/2024 on the amendment of Annexes no. 1 - 3 to the Order of the President of the National Office for Prevention and Control of Money Laundering no. 208/2020 for the approval of the model and content of the standardised form "Report of the finding and sanctioning of contraventions", of the control identification card, as well as their printing characteristics, published in the Official Gazette no. 253 of 25 March 2024;
- ❖ Government Decision no. 639/2024 amending and supplementing the Regulation on the organisation and functioning of the National Office for Prevention and Control of Money Laundering, approved by Government Decision no. 491/2021, published in the Official Gazette no. 558 of 14 June 2024;
- ❖ Decision of the Prime Minister No. 365/2024 for the amendment of the Decision of the Prime Minister No. 454/2022 on the establishment of the Inter-Institutional Council for the approval of the Report on the national assessment of the risks of money laundering and terrorist financing, the National Plan of Measures and their updates, published in the Official Gazette No. 1.096 of 1 November 2024;
- ❖ Decision of the Prime Minister No. 150/2024 for the amendment of the Decision of the Prime Minister No. 2/2024 on the establishment of the Inter-Institutional Committee for the elaboration of the National Strategy for preventing and combating money laundering and terrorist financing and the related action plan, published in the Official Gazette no. 433 of 10 May 2024.

b) In 2024, the Office initiated the following draft regulatory acts:

- ❖ Draft Law on amending and supplementing Law 129/2019 on preventing and combating money laundering and terrorist financing, as well as amending and supplementing certain regulatory acts, approved by the Government and under parliamentary procedure.
The draft law was prepared in order to eliminate the shortcomings noted in the Mutual Evaluation Report on Romania, which was adopted at the 65th Moneyval Plenary Meeting (Strasbourg, 24 - 26 May 2023);
- ❖ Draft Emergency Ordinance on amending and supplementing Law 129/2019 on preventing and combating money laundering and terrorist financing, as well as amending and supplementing some regulatory acts, currently in the authorisation procedure.
The Draft Emergency Ordinance has been prepared for the purpose of transposing Directive (EU) 2015/849, as amended by Article 38 of Regulation (EU) 2023/1113.

2. Analysing and issuing opinions on the following proposals for European Directives:

- ❖ the proposal for a Directive of the European Parliament and of the Council amending Directive (EU) 2019/1153 as regards competent authorities' access to centralised registers of bank accounts through the interlinking system and technical measures to facilitate the use of transaction records - has become Directive (EU) 2024/1654;
- ❖ Proposal for a Directive of the European Parliament and of the Council on European cross-border associations;
- ❖ Proposal for a Directive of the European Parliament and of the Council on the harmonisation of certain aspects of insolvency law.

3. Analysing and issuing opinions and/or endorsing the following draft regulatory acts initiated by other institutions or public authorities:

- ❖ Government Emergency Ordinance draft amending and supplementing Government Emergency Ordinance No 202/2008 on the implementation of international sanctions - became Emergency Ordinance No 135/2024;
- ❖ Government Emergency Ordinance Draft to supplement Law 200/2004 on the recognition of professional diplomas and qualifications for regulated professions in Romania.

4. Analysing and endorsing, from the point of view of legality, 335 orders issued by the President of the Office, as well as other documents by means of which the patrimonial liability of the institution is engaged.

5. Formulating the responses to 2 questions by Members of Parliament, in consultation with the specialised directorates within the Office.

6. Petitions - 340 dealt with by 2024;

7. Hearings - 9;

8. Notes and reports managed by the Legal Service - 186;

9. Correspondence with state institutions managed by the Legal Service - 521;

10. a). Reports in which contraventional sanctions were imposed by the Office's investigating officers - 48 reports;

b). Reports by which the NAFA imposed contraventional sanctions pursuant to Article 57 of Law 129/2019 - 4 reports;

11. Disputes

The Legal Service managed 33 cases pending before the Romanian courts, of which 12 cases were finally settled.

FINANCIAL AND HUMAN RESOURCES

Budget and budgetary execution

The National Office for Prevention and Control of Money Laundering is financed from the state budget, through the Ministry of Finance.

The NOPCML budget, approved for the year 2024 by the Ministry of Finance, as chief authorising officer, was in the amount of RON 23,863,000, as follows:

Chapter	Indicator name	Approved budget 2024 -RON-	Execution 31.12.2024 -RON-	Utilisation rate (%)
50.00	GRAND TOTAL	23,863,000	23,749,363	99.52
50.01	STATE BUDGET EXPENDITURE	23,863,000	23,749,363	99.52
51.01	Public authorities and external actions, of which:	23,863,000	23,749,363	99.52
	• Current expenditure, of which:	23,863,000	23,749,363	99.52
	– Personnel expenditure	20,500,000	20,461,326	99.81
	– Goods and services	3,207,000	3,133,308	97.70
	– Other transfers	44,000	43,514	98.90
	– Other expenditure	112,000	111,215	99.30

The budgetary execution as at 31 December 2024 amounted to RON 23,749,363, the degree of utilisation of budget appropriations being 99.52% of the approved annual provisions.

Human Resources Management Department

In accordance with the provisions of Article (2) of Law 129/2019 on preventing and combating money laundering and terrorist financing, as well as amending and supplementing some regulatory acts, with subsequent amendments and supplements, the Office is chaired by a President, who has the quality of a tertiary authorising officer, and a Vice-President, appointed by Government Decision.

The contractual personnel of the Office consists of management and executive personnel.

Contractual personnel with functions at management level (as of 01.07.2024) consists of Directors-General, Directors and Heads of Service (according to GD no. 639/2024 amending GD no. 491/2021).

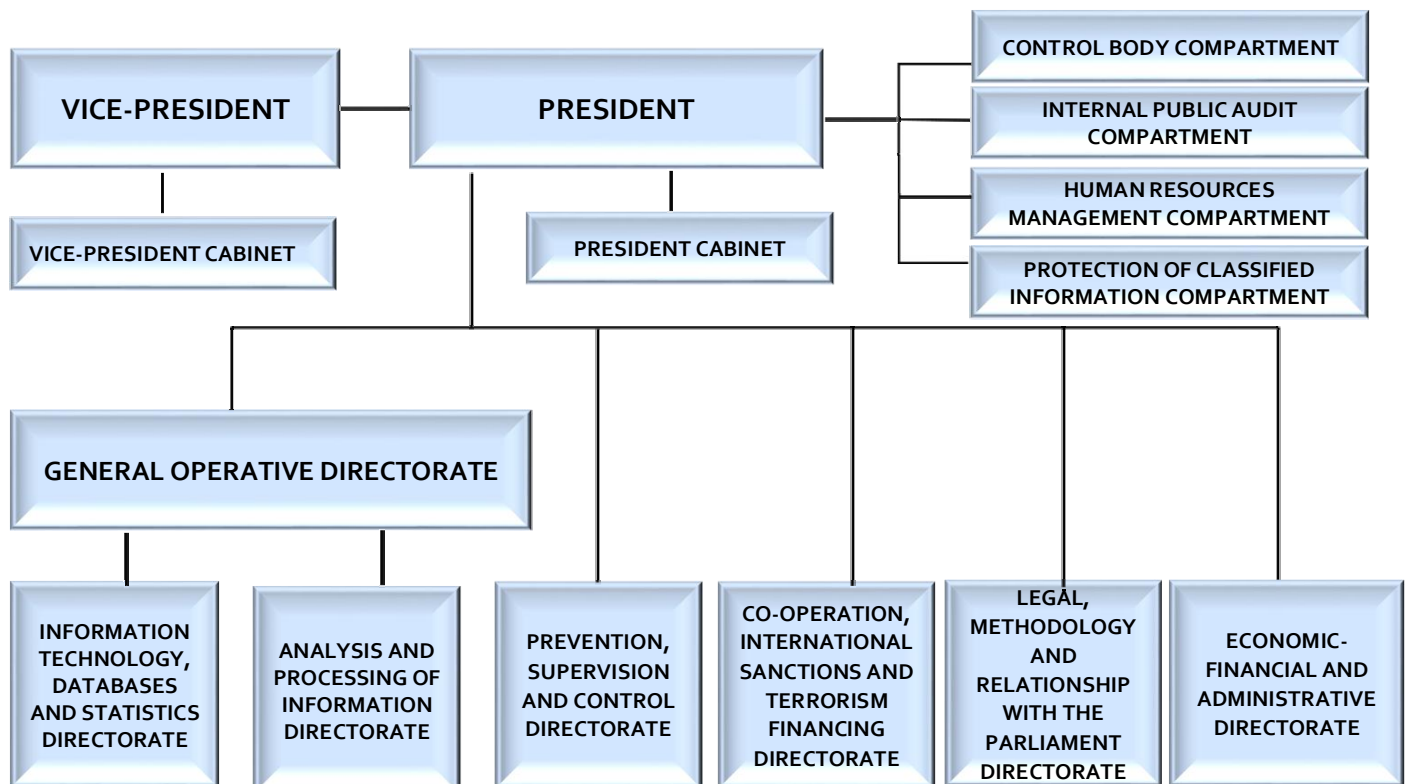
Contractual personnel with functions at executive level consist of financial analysts, assistant analysts, as well as personnel in common budget sector functions, such as drivers and building cleaners.

According to Article 2 para. (3) of the Regulation on the organisation and functioning of the National Office for Prevention and Control of Money Laundering approved by GD no. 491/2021 with subsequent amendments and supplements, the maximum number of posts is 160, including dignitaries and their cabinets.

On 01.01.2024 the organisational structure of the National Office for Prevention and Control of Money Laundering was as follows:

ORGANISATIONAL STRUCTURE of the National Office for Prevention and Control of Money Laundering

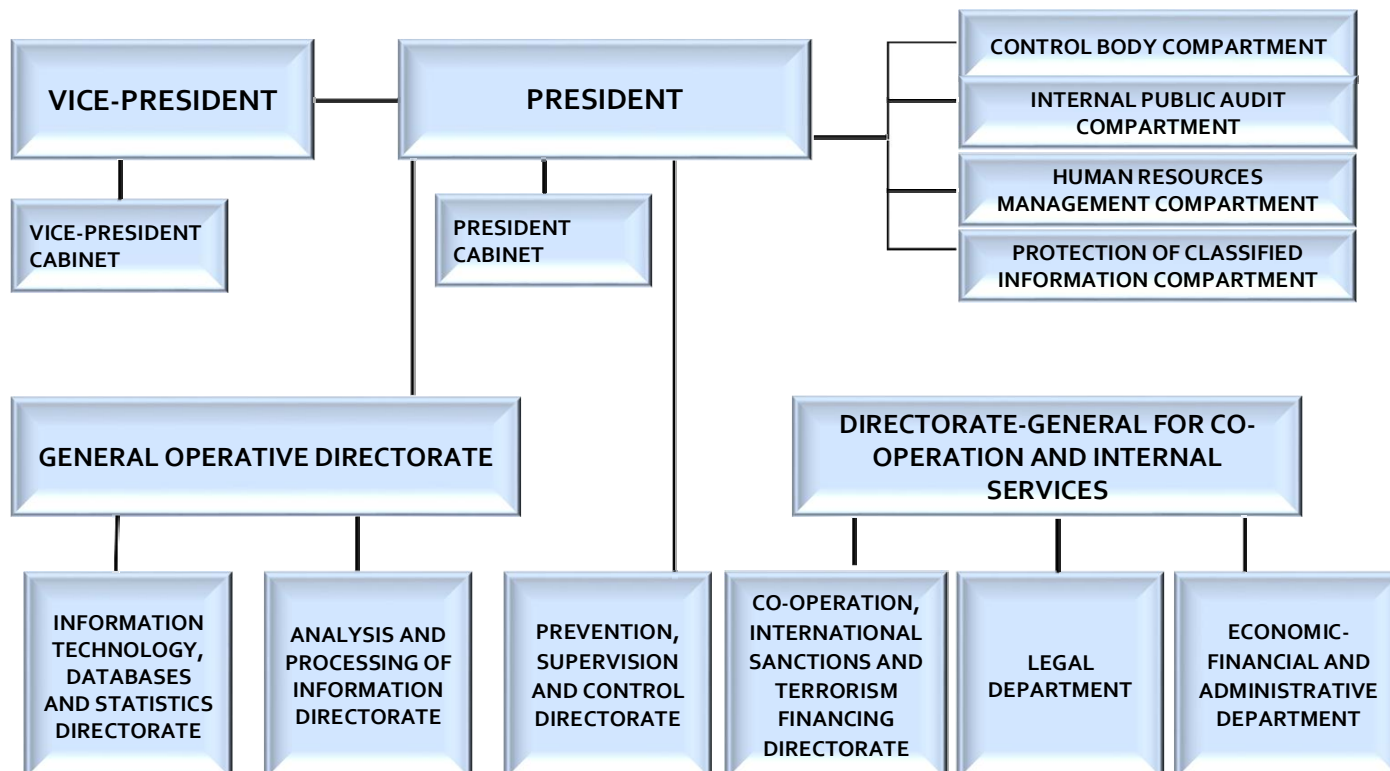
Maximum number of posts = 160, including dignitaries and their cabinets



As of 01.07.2024, according to the provisions of GD no. 639/2024 amending GD no. 491/2021, the organisational structure of the National Office for Prevention and Control of Money Laundering is as follows:

ORGANISATIONAL STRUCTURE
of the National Office for Prevention and Control of Money Laundering

Maximum number of posts = 160, including dignitaries and their cabinets



On 01.07.2024, according to the provisions of Article 7 of GD no. 491/2021 with subsequent amendments and supplements, the following structures are organised and functioning within the Office:

- a) Control Body Compartment;
- b) President Cabinet;
- c) Vice-President Cabinet;
- d) General Operative Directorate;
- e) Directorate-General for Co-operation and Internal Services;
- f) Prevention, Supervision and Control Directorate;
- g) Human Resources Management Compartment;
- h) Internal Public Audit Compartment;
- i) Protection of Classified Information Compartment.

The following structures are organised and function within the General Operative Directorate:

- a) Information Technology, Databases and Statistics Directorate;
- b) *** *Repealed by GD no. 1.243/2022 of 18 October 2022;*
- c) Analysis and Processing of Information Directorate.

The following structures are organised and function within the Directorate-General for Cooperation and Internal Services:

- a) Co-operation, International Sanctions and Terrorism Financing Directorate;
- b) Legal Department;
- c) Economic-Financial and Administrative Department.

Bearing in mind the need to maintain the institution at a level reflecting its importance at both national and international level, as well as a new approach to the management of the Office, in line with the importance of the work carried out in its field of competence, the Office's structures are organised into departments, offices and compartments as follows:

- a) **Control Body Compartment;**
- b) **President Cabinet;**
- c) **Vice-President Cabinet;**
- d) **The General Operative Directorate** has authority over:
 - ❖ **Information Technology, Databases and Statistics Directorate, comprising:**
 - ✓ *Information Technology Department;*
 - ✓ *Statistical Analysis and Monitoring Compartment;*
 - ✓ *National Risk Assessment, Strategic Analysis and Methodology Compartment;*
 - ✓ *Secretariat, Registry, Archives Compartment.*
 - ❖ **Analysis and Processing of Information Directorate, comprising:**
 - ✓ *Operational Analysis Department 1;*
 - ✓ *Operational Analysis Department 2;*
 - ✓ *Operational Analysis Department 3;*
 - ✓ *The Risk Assessment Department, which has authority over:*
 - Risk Assessment Compartment.
- e) **The Directorate-General for Co-operation and Internal Services** has authority over:
 - ❖ **Co-Operation, International Sanctions and Terrorism Financing Directorate, comprising:**
 - ✓ *The International Relations and Co-operation Department, which has authority over:*

- Information Exchange, International Sanctions and Terrorist Financing Compartment.
- ✓ *European Affairs and Interinstitutional Co-operation Department.*
- ❖ **The Legal Department, which has authority over:**
- ✓ *Petitions settlement Department.*
- ❖ **The Economic, Financial and Administrative Department, which has authority over:**
- ✓ *Budget, financial accounting, payroll Compartment;*
- ✓ *Public procurement Compartment;*
- ✓ *Administration Compartment.*
- f) **The Prevention, Supervision and Control Directorate, which has authority over:**
- ✓ *Department 1, which has authority over:*
 - Supervision, training and co-operation with self-regulatory organisation and NGO Compartment;
 - Control Compartment (on-site supervision).
- ✓ *Department 2 (Training, supervision and control of entities without self-regulatory organisation and crypto-assets), which has authority over:*
 - Supervision and training, less crypto-assets Compartment;
 - Crypto-assets supervision and training Compartment;
 - Control Compartment (on-site supervision).
- ✓ *Co-Operation, International Sanctions Enforcement and Terrorism Financing Compartment.*
- g) **Human Resources Management Compartment;**
- h) **Public Internal Audit Compartment;**
- i) **Protection of Classified Information Compartment.**

In accordance with the provisions of Article 8 of GD no. 491/2021 for the approval of the Regulation on the organisation and functioning of the National Office for Prevention and Control of Money Laundering, the duties of the structures established at the level of the Office were approved by the Order of the President of the NOPCML no. 138/27.05.2021, with subsequent amendments and supplements. In order to ensure a good functionality and efficiency of the Office's activity, by the Order of the President of the NOPCML no. 272/17.06.2021, the duties of the structures within the directorates were established, with subsequent amendments and supplements.

At the level of the Office, after the approval of the ***State Budget Law for 2024 and the approval of the NOPCML budget for 2024 by the Ministry of Finance as chief authorising officer***, there was established the **STATEMENT** regarding the breakdown by function of the maximum number of posts approved for financing in 2024, i.e. 160 posts.

STATEMENT concerning the breakdown by function of the maximum number of posts approved for funding in 2024, i.e. 160 posts:

	Total posts approved by GD no.491/2021 and budgeted in 2024	Total posts approved and budgeted on 01 January 2024, 160, of which		Total posts converted/abolished during 2024 (as of 1 July 2024)	Total posts 31 December 2024, 160, of which	
		Posts filled	Job vacancies		Posts filled	Vacancies
SUMMARY	160	126	34	160	126	34
PRESIDENT	1	1	0	1	1	0
VICE-PRESIDENT	1	1	0	1	1	0
DIRECTOR-GENERAL	1	1	0	2	2	0
DIRECTOR	6	6	0	4	4	0
HEAD OF DEPARTMENT	11	10	1	11	9	2
HEAD OF COMPARTMENT	12	11	1	-	-	-
TOTAL MANAGEMENT	32	30	2	19	17	2
Cabinet Director	1	1	0	1	1	0
Counsellor	2	2	0	2	1	1
TOTAL President and Vice-President Cabinet	3	3	0	3	2	1
FINANCIAL ANALYST I	39	31	8	59	45	14
FINANCIAL ANALYST II	18	16	2	17	17	0
FINANCIAL ANALYST III	30	28	2	27	21	1
FINANCIAL ANALYST IV	28	8	20	25	7	18
TOTAL FINANCIAL ANALYSTS	115	83	32	128	95	33
ASSISTANT ANALYST I	4	4	0	4	4	0
ASSISTANT ANALYST II	1	1	0	1	1	0
TOTAL ASSISTANTS	5	5	0	5	5	0
DRIVER	3	3	0	3	3	0
BUILDING CLEANER	2	2	0	2	2	0
TOTAL WORKERS	5	5	0	5	5	0
TOTAL NOPCML	160	126	34	160	124	36

Taking into account the application of the provisions of Law 296/2023 on some fiscal and budgetary measures to ensure Romania's long-term financial sustainability, with subsequent amendments and supplements, as of 01.07.2024 the organizational chart was established.

In 2024, according to the provisions of Article VII of GEO no. 115/2023 on some fiscal and budgetary measures in the field of public expenditure, for fiscal consolidation, combating fiscal evasion, amending and supplementing some regulatory acts, as well as for the extension of some terms, the filling of vacant or temporarily vacant posts through competition or examination was suspended.

As an exception, in accordance with the provisions of Article VII para. (3) of GEO no. 115/2023, during 2024 competitions were organised at the Office to fill two executive posts, following their vacancy, in the Information Technology, Databases and Statistics Directorate and the Economic, Financial and Administrative Department.

The support structures have been strengthened with the aim of making the Office's work more efficient by capitalising on the experience and performance of all employees by making temporary appointments to management positions until these posts are filled through competition.

The Human Resources Management Compartment has carried out specific human resources management operations regarding the NOPCML personnel (orders on personnel recruitment, termination of individual employment contracts, promotions, changes in grading, personnel positions, salary entitlements established by law etc.), management of operational or system procedures involving human resources, providing consultancy in relation to the performance evaluation of professional activity for 2023.

During the year 2024, the Office's personnel benefited from changes in salary entitlements in accordance with the provisions of GEO no. 115/2023 on some fiscal and budgetary measures in the field of public expenditure, for fiscal consolidation, combating fiscal evasion, amending and supplementing some regulatory acts, as well as for the extension of some terms and GEO no. 53/2024 on measures regarding the salaries of personnel in some sectors of budgetary activity, as well as regulating some organisational aspects.

With regard to training and professional development, the Office's personnel participated in training and professional development courses, training, specialisations and working meetings organised by both the governmental and non-governmental sectors in areas of interest for the institution's work.

Employees from the Office participated in training events on the following topics: *"Communication before words", "Preventing and Combating Corruption - Anti-Fraud Training Initiative for Public Administration, implemented between April 2023 - September 2024", "Preventing and Combating Money Laundering - Impact of the new law on liberal professions", "Image and Public Discourse", "Administrative Act and Administrative Litigation", "Incompatibilities and Conflicts of Interest in Public Administration", "Protection of classified information within public institutions", "National legislative framework in the field of money laundering", "Avoiding insolvencies - restructuring as a solution for companies in difficulties", "Sociology of institutions", "Strategic planning in the public sector", "Administration, governance and public office", "Ethics and integrity", "European funds", "Exploring the most important roles of NGOs affected by artificial intelligence".*

The courses were held at the Office's premises, at the organiser's premises and online.

At the same time, during 2024, online training sessions were held for the obliged entities subject to Law 129/2019, as amended and supplemented, supported by financial analysts from the Prevention, Supervision and Control Directorate.

❖ Activity in the field of personal data protection

At the Conference "*Findings and Recommendations for Public Sector Controllers*", organised by the National Supervisory Authority for Personal Data Processing in January 2024, two nominees from the Office participated online as guests.

During 2024, information/training of employees in the field of personal data protection with news/explanations on the breach of certain articles of Regulation (EU) 2016/679 - GDPR was carried out. At the same time, it was also envisaged to complete the consent on the processing of personal data for staff participating in competitions organised by the Office.

❖ Activity in the field of equal opportunities between women and men

At NOPCML level, among the personnel, one employee is designated as the person responsible for gender equality. Pursuant to the provisions of Law 202/2002 republished, on equal opportunities and equal treatment between women and men and the provisions of GD no.262/2019 for the approval of the Implementing Rules for the application of the provisions of the Law, within the Office, the note on the legal provisions in the field of ensuring equal opportunities and equal treatment between women and men was disseminated to all employees of the NOPCML, for information and awareness, against signature, information posted on the notice board of the institution.

The Action Plan on the implementation of the principle of equal opportunities between women and men in the NOPCML for the period 2020-2030 has been drawn up and submitted to the National Agency for Equal Opportunities for Women and Men.

In the context of the provisions of GD no. 970/2023 for the approval of the Methodology on preventing and combating harassment based on gender, as well as moral harassment at work, they have been integrated into PS - 10 Prevention and sanctioning of discrimination, as well as prevention and combating harassment at work, Ed. II, Rev.o. The Office has set up a Commission for receiving and dealing with complaints/referrals.

❖ Activity in the field of occupational safety and health

For the year 2024, a contract for the provision of occupational health services has been concluded with a company with competences in this field, in accordance with the legal provisions in force.

The NOPCML workers were medically assessed by the representatives of the occupational health office and benefited from the contracted services (between the Office and the occupational health service provider), according to the legal provisions; the medical certificate of fitness for employment resulting from the medical assessment were attached to the individual instruction form on occupational health and safety, copies of which were sent to the subjects.

INTERNAL CONTROL

Internal audit activity at NOPCML level

As an organisational structure of the NOPCML, the Internal Public Audit Compartment carries out its activity in accordance with the provisions:

- ❖ *Law 672/2002 on public internal audit, republished, and the*
- ❖ *Government Decision no. 1086/2013 for the approval of the General Rules on the exercise of public internal audit activity.*

IPAC also fulfils its duties according to its own methodological rules on the exercise of public internal audit activity specific to NOPCML, endorsed by the Internal Public Audit Directorate of the Ministry of Finance. The public internal audit is part of the internal/managerial control system, contributing to the implementation of Standard 16 *Internal Auditing*, according to the provisions of *OSGG no. 600/2018 on the approval of the Code of Managerial Internal Control of Public Entities*.

In 2024, 3 (three) missions were carried out: 1 (one) assurance mission carried out and 2 (two) advisory missions concluded with report and informal advisory missions carried out through 26 (twenty-six) ad hoc activities; the degree of achievement of the public internal audit plan was 75% in 2024.

The three missions carried out in 2024 had the following themes: *"Evaluation of the system of inter-institutional cooperation, international relations and information exchange, European affairs, evaluation of the system of implementation of international sanctions, prevention of terrorism financing and management according to the law, the work of the spokesperson", "Elaboration of the contribution of the NOPCML to the drafting of the National Strategy for preventing and combating money laundering and terrorist financing and the related Action Plan", "Providing the technical secretariat of the Inter-institutional Committee for the elaboration of the National Strategy for preventing and combating money laundering and terrorist financing and the related Action Plan"*.

There were also advisory and facilitation of understanding missions in the form of informal, ad hoc counselling missions, when there were requests for advice from the structures or management of the institution.

The 26 (twenty-six) informal counselling missions took the form of activities in different areas such as:

- ❖ national anti-corruption strategy;
- ❖ the internal management control system;
- ❖ activities to implement the institution's new software - working sessions;
- ❖ documentation activities for human resources, payroll, memoranda, etc..

At the same time, from 05.06.2024 to 09.09.2024, the Internal Public Internal Audit Directorate of the Ministry of Finance carried out an assessment mission on the activity of the Internal Public Audit Department of the NOPCML on the subject *"Evaluation of the organisation and performance of the internal audit activity at the NOPCML level"*, which ended with the Internal Public Audit Report No. 450707/02.10.2024, registered at the NOPCML under no. 4688/CA/03.10.2024. This report found a number of elements that can be qualified as strengths presented as positive aspects and, at the same time, a number of aspects to be improved for which recommendations were formulated; the implementation of these recommendations was planned to be realised during 2025, according to the Action Plan for the implementation of the recommendations submitted to DAPIAP - MoF.

Also, in 2024, CAPI's personnel has realised the improvement of individual professional training and according to Article 21 (7) of Law 672/2002 republished, has improved its knowledge, skills and values within the framework of continuous professional training by attending courses and individual study on related topics.

Control Body Compartment

The Control Body Compartment is organised and operates within the Office according to Article 7, Chapter 1 of GD no. 491/2021 for the approval of the Regulation on the organisation and functioning of the National Office for Prevention and Control of Money Laundering.

The internal control activity is carried out in accordance with the provisions of OSGG no. 600/2018, aimed at compliance with the applicable regulations in the areas of activity specific to the Office's own department referred by individuals or legal entities, bodies authorised by law, internal audit, media reports etc.

According to its specific attributions, the Control Body of the NOPCML *"examines and settles the complaints and petitions assigned by the Office's management regarding the non-compliance of the activity carried out by the structures within the Office's own apparatus or by its staff"* (Order of the President no. 138 of 27.05.2021).

Between September and December 2024, the personnel of the Control Body Compartment participated in the evaluation mission of the High Court of Cassation and Justice as an expert evaluator in accordance with Articles 11 and 12 of the Methodology for monitoring the implementation of the SNA 2021-2025 approved by OMJ no. 2046/2022, during the meetings held in December 2022, the cooperation platforms approved the thematic evaluation topics, as well as the institutions to be evaluated in 2024, including the High Court of Cassation and Justice.

Also, during 2024, the Control Body Compartment carried out a number of actions, namely:

- ❖ Implementation and coordination of the activities related to the ***"Integrity Plan of the National Office for Prevention and Control of Money Laundering for the period 2022 - 2025"***, in accordance with the provisions of Government Decision no. 1.269/2021 on the approval of the National Anti-Corruption Strategy 2021-2025 and its related documents, approved and published by order of the President, by communicating the status of implementation to the Technical Secretariat (TS) of the National Anti-Corruption Strategy 2021-2025.

- ❖ Communication on the state of implementation of some measures of the National Strategy against Organised Crime 2021 - 2024, regarding the activity of the National Office for Prevention and Control of Money Laundering.
- ❖ Correspondence on the work of the Monitoring Committee of the NSAOC (National Strategy against Organised Crime - 2021-2024);
- ❖ Correspondence with the Ministry of Finance on the Co-operation Platform of Independent Authorities and Anti-Corruption Institutions;
- ❖ Correspondence with the Ministry of Justice on the Co-operation Platform of Independent Authorities and Anti-Corruption Institutions;
- ❖ Correspondence on the work of the NAFS (National Anti-Fraud Strategy- 2021-2027) Monitoring Committee;
- ❖ Correspondence with the National Integrity Agency on the application within the NOPCML of the Law 361/2022 on the protection of the whistleblower in the public interest;
- ❖ Participation in the working group on the National Anti-Fraud Strategy (NAFS) for the protection of the financial interests of the European Union in Romania, 2023-2027 – Article 325 TFEU Network Meeting;
- ❖ Participation in the working group on the National Anti-Fraud Strategy (NAFS) for the protection of the financial interests of the European Union in Romania, 2023-2027 - Irregularity Reporting Network (MFF);
- ❖ Participation in the working group on the National Anti-Fraud Strategy (NAFS) for the protection of the financial interests of the European Union in Romania, 2023-2027 - Anti-Fraud Communication Network;
- ❖ Participation in the working group on the National Anti-Fraud Strategy (NAFS) for the protection of the financial interests of the European Union in Romania, 2023-2027 - Anti-Fraud Control;
- ❖ Participation in the working group on the National Anti-Fraud Strategy (NAFS) for the protection of the financial interests of the European Union in Romania, 2023-2027 - Anti-fraud training.

The Control Body Compartment was also involved in the following activities:

- ❖ participated in the work of the Monitoring Committee of the NSAOC (National Strategy against Organised Crime - 2021-2024);
- ❖ coordinated the implementation of the integrity plan of the National Anti-Corruption Strategy 2022-2025 and participated in the working meetings of the Platform for Co-operation of Independent Authorities and Anti-Corruption Institutions;
- ❖ participated in the NAFS (National Anti-Fraud Strategy - 2021-2027) Monitoring Committee;
- ❖ coordinated the activity of appointment and participation in discussions with OECD experts within the Project "*Capacity building in the field of public governance - a coordinated approach of the Centre of the Government of Romania*", a project carried out by the Ministry of Justice in partnership with the OECD;
- ❖ coordinated and managed the implementation of the public interest whistleblower institution within the National Office for Prevention and Control of Money Laundering, according to the provisions of Law 361/2022 on the protection of the public interest whistleblower.

Protection of Classified Information

In the year 2024, the Classified Information Protection Compartment has fulfilled its mission, ensuring the implementation of the legal rules for the protection of classified information within the institution, being revised and updated the internal rules and security measures on the protection of EU classified information, as well as the Guidelines on the assignment of the classification and secrecy levels for state secret and official secret information, drawn up within the National Office for Prevention and Control of Money Laundering.

Following the evaluation of the ORNISS committee, the authorisation for the operation of the National Registry System component within the NOPCML, for the management of EU classified information, has been obtained.

During the reporting period, the MES@GER and CCOA SNPCT communication IT systems were implemented, thus facilitating the exchange of inter-institutional information in a secure and operational manner.

The members of the security structure participated in the working meetings proposed by the designated security authority, thus contributing to strengthening inter-institutional co-operation.

All employees of the Office are cleared for access to classified information and have been trained in the protection of classified information, and the work of the Office is carried out without security incidents.

In statistical terms, during 2024, the necessary formalities for the issuance of access documents to personnel were undertaken, with 47 authorisations for access to state secret information and 21 authorisations for access to service secret information being issued.



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