

**FINANCIAL INTELLIGENCE UNIT**

**ANNUAL REPORT 2022**

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Dear Reader,

In 2022, the Financial Intelligence Unit (FSJ) of the Presidium of the Police Force continued to perform tasks in the area of prevention and detection of money laundering, financing of terrorism and financing of proliferation.

The year 2022 brought fundamental changes in the readiness of the FSJ to fulfil the tasks imposed by Act No. 297/2008 Coll. on the protection against money laundering and on the protection against terrorist financing, in particular in the area of the modernisation of technical means. The FSJ implemented the goAML Enterprise Edition application, a comprehensive information system developed by UNODC specifically for the needs of the financial intelligence units of all Member States, which, as a modern tool of the 21st century, will provide a wide range of possibilities and modernisation in the fight in the prevention and detection of ML/FT/FP.

Despite the increasing number of unusual transaction reports, which rose by 7% year-on-year, the FSJ was able to receive, analyse and process these.

National cooperation in the field of AML/CFT/CPF was evaluated very positively last year, where, especially with the establishment of the National Centre for Special Types of Crime of the Presidium of the Police Force, the fight against ML/FT/FP has been significantly streamlined and strengthened.

The 2022 period has also brought major changes in the security situation in the region. The Slovak Republic is assisting Ukraine in the fight against Russian aggression, and the FSJ is actively and operationally involved in this fight by responding to newly observed phenomena and the modus operandi of ML/FT/FP perpetrators.

In spite of the high number of obliged persons for whom the FSJ requires and controls the fulfilment of their obligations set out in Act No. 297/2008 Coll. on the protection against money laundering and on the protection against terrorist financing, the number of inspections carried out has seen a year-on-year increase. The volume of fines imposed by the FSJ has also increased.

The Annual Report qualitatively and quantitatively summarises the activities of the FSJ for the past year 2022.

Director of the Financial Intelligence Unit

## 1 FSJ IN A NUTSHELL

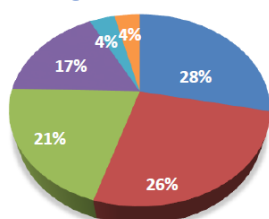
The FSJ has been fulfilling its function since 1996. The FSJ belongs to the category of police-type financial intelligence units. The FSJ is an organisational unit of the Presidium of the Police Force, which is established generally under the Act on the Police Force<sup>1</sup>. The FSJ's activities are also governed by a special act<sup>2</sup> and other internal legal norms.

The FSJ, as the central national unit, is responsible for the prevention and detection of ML/FT/FP. It is an independent authority responsible for receiving and analysing information on unusual transactions and other information relevant in the context of ML/FT/FP, as well as related suspected predicate offences, and referring it according to subject matter jurisdiction. Only police officers working at the FSJ have access to the FSJ databases and archive. The FSJ, as the central national unit for AML/CFT/CPF, analyses, processes and independently decides on the referring or further disclosure of information to state authorities and foreign partners under the AML Act. In 2022, the workforce of the FSJ comprised a total of 53 employees with varying lengths of experience and type of higher education completed. The FSJ places great emphasis on the continuous education of its staff. In 2022, the main training activities of FSJ employees included professional training focused on data and graphical data analysis, information technology, the analytical process and the creation of financial analyses. In addition, FSJ staff participated in a workshop on best practices related to the application of risk factors in the financial sector supervision process, in cooperation with experts from the Council of Europe and counterparts from other jurisdictions.

*The main tasks of the FSJ include receiving and processing UT reports and conducting surveillance.*

The main tasks of the FSJ include receiving and processing UT reports from a wide range of obliged persons identified in the AML Act and supervising obliged persons in the area of compliance with their obligations under the AML Act. Last but not least, the FSJ emphasises the prevention of ML/FT/FP offences by conducting training for obliged persons, issuing methodological guidelines for obliged persons, publishing administrative decisions of the FSJ, etc.

**Chart No.1**  
**Staffing levels in 2022**



	UT Unit		International Cooperation Unit
	Analytical Unit		Obligated Persons Control Unit
	Management		Civil employees

*Source: Analytical Unit*

<sup>1</sup> Act of the National Council of the Slovak Republic No. 171/1993 Coll. on the Police Force, as amended

<sup>2</sup> Act of the National Council of the Slovak Republic No. 297/2008 Coll. on the protection against money laundering and on the protection against terrorist financing and on the amendment to certain acts, as amended (AML Act)

## 2 UNUSUAL TRANSACTIONS

Pursuant to Article 17 of the AML Act, obliged persons are obliged to report to the FSJ an unusual transaction or an attempt to carry it out without undue delay. The methods and scope of the information to be reported are set out in the AML Act and other FSJ methodological guidelines. Other state authorities and foreign financial intelligence units also send information to the FSJ.

All information received or obtained by the FSJ through its own activities is aggregated in the FSJ database. According to internal rules, this information is prioritised for further processing.

One of the FSJ's priorities is to improve the efficiency of UT reporting across all sectors of obliged persons. For this reason, training and methodological tools for obliged persons have been developed (see Chapter 10 for more details). The knowledge and correct understanding of the risks by obliged persons leads to improved and more accurate UT reports.

During 2022, the FSJ received a total of 2,185 UT reports from obliged persons. The total value of transactions amounted to almost EUR 1,160,635,916.00.

Of the total number of UT reports received, up to 85.17% were provided by the banking sector, with a significantly smaller volume of UT reports sent by other obliged entities. Compared to the previous year, the number of UT reports sent by the banking sector decreased by almost 7% (out of the total number of UT reports), but the number of UT reports remained the same. The number of UT reports from other obliged persons has seen a slight increase (by 2-3%).

**Table No.1**  
**Number of UT reports received in 2022 from banks**

Obligated person	Number of UT reports
NBS	36
Commercial banks	1,861
Total	1,897

Source: FSJ

**Table No.2**  
**Number of UT reports received in 2022 from other financial institutions**

Obligated person	Number of UT reports
Central Securities Depository	6
Insurance/reinsurance companies	34
Securities traders	7
Supplementary pension companies	2
Pension fund management companies	1
Payment institutions, payment service agents and electronic money institutions	15
Financial lease companies	68
Asset management companies and depositories	4
Financial agents, financial advisers	1
Exchange offices and others	26
Other	2
Total	166

Source: FSJ

**Table No.3****Number of UT reports received in 2022 from other obliged persons**

Obligated person	Number of UT reports
VASPs	60
Lawyers, notaries	4
Auditors, accountants, tax advisers	1
Postal undertakings	24
Gambling operators	28
Bankruptcy trustees	1
Real estate	3
Bailiff	1
Total	122

Source: FSJ

**Table No.4****Number of disseminations in 2022**

Authorised entity	Number
LEAs (Article 26(2)(b)) of the AML Act	249
NAKA (Article 26(2)(l)) of the AML Act (of which the Counter Terrorism Centre)	108 13
Regional Headquarters of the Police Force, District Headquarters of the Police Force	256
NCODK	316
Financial Directorate of the SR	547
Foreign FIUs	561

Source: FSJ

After receiving an UT report and its classification into individual categories according to risk, the selected information is further analysed, supplemented by those obtained by the FSJ from other sources, and the resulting information, processed in this way, is referred to the competent law enforcement authority or other authority in accordance with law, according to the subject matter and local jurisdiction.

*The FSJ receives, registers, prioritises, processes and refers or files the UT report.*

The Police Force units to which the FSJ has sent information shall provide feedback (information on the results of the screening or investigation) in accordance with Article 27(2) of the AML Act. For the FSJ, it is an important indicator for improving its own efficiency in evaluating and analysing information.

If the obliged person assesses a transaction as unusual and there is also a risk that the execution of the UT may frustrate or substantially impede the seizure of proceeds of crime or funds intended for the financing of terrorism, it is obliged under Article 16 of the AML Act to delay the executing of the UT. The obligation to delay the UT is also imposed on the obliged person upon written request of the FSJ. The delay of the UT is only possible for the period prescribed by law, up to a maximum of 120 hours, and for a further 72 hours in the event of handing over the case to LEAs.

**Table No.5****Delayed UTs in 2022**

<b>Total number</b>	<b>106</b>
UT delayed by an obliged person	104
UT delayed at the request of the FSJ	2

Referring the delayed UT to a LEA with subject matter and local jurisdiction	81
Total value of funds of delayed UTs	EUR 18,472,337.79

Source: FSJ

Another way of mitigating the ML/FT risk is the refusal of the obliged person to enter into a business relationship, terminate a business relationship or refuse to execute a transaction pursuant to Article 15 of the AML Act. These precautionary measures are a way to prevent the disposal of funds derived from criminal activity that may also be intended for terrorist financing purposes. The above provision of the AML Act was used by the obliged person in 177 cases in 2022, with a value of transactions amounting to almost EUR 16,491,209.00.

The FSJ sends information to obliged persons on the effectiveness of the UT reports provided by them, not only for the purpose of fulfilling the legal obligation under Article 26(2)(i) of the AML Act, but primarily in order to provide the obliged person with information on the settings for the assessment and identification of UTs pursuant to Article 14 of the AML Act and its subsequent reporting to the FSJ. Based on the above, the obliged person may reassess the effectiveness of its UT reporting processes or modify its internal procedures.

### 3 METHODS AND TRENDS OF ML/FT

The unusual transactions recorded by the FSJ during 2022 were largely influenced by the current economic events in the world related to inflation, price increases, but above all the war in Ukraine. It is these realities that have become fundamental and can be classified as one of the main trends in the UTs of 2022.

In the context of rising inflation, when cash deposits in accounts held not only in the Slovak Republic, but also everywhere in the world were losing value, it was possible to observe a greater inflow of funds from foreign accounts held e.g. in Switzerland, Cyprus, etc., which were subsequently used to purchase lucrative real estate within the Slovak Republic. The origin of the funds could not be clearly identified, but some of the investigations pointed to a possible link with economic cases investigated by LEAs in the Slovak Republic in the past.

The recent media coverage of corruption cases has also prompted the obliged persons to report transactions carried out by entities with links to the prosecuted persons, in which a more complex economic background has often been noted, involving funds set up in tax havens, where it is not possible to exclude the possibility of expediency in order to secure the assets of the family members of the prosecuted persons in the event of the imposition of forfeiture or confiscation penalties.

The conflict in Ukraine has resulted in an increase in the number of UTs reported during 2022, on the one hand concerning cash brought from Ukraine into the territory of the Slovak Republic and, on the other hand, the screening of foreign payments accumulated in personal or business accounts under the pretext of assistance to Ukraine.

#### Money laundering schemes involving so-called shell companies

*During 2022, the FSJ carried out an extensive analysis on a group of Hungarian nationals who, in border areas, organised by one person residing in the Slovak Republic acting on behalf of a Slovak employment agency, opened personal accounts in bulk, to which payments were credited from accounts with German IBANs held at the fintech bank Vivid Money. The funds were subsequently withdrawn in cash in Hungary and Slovakia. The information is still under review at the NCODK at this time, according to feedback.*

*An interesting case that the FSJ started to document during 2022 is the case of a lawyer operating in the Slovak Republic, who purposefully helps to create a network of so-called shell companies, which are mostly based in the same virtual seats and their statutory bodies are persons of foreign nationality (Hungary, Serbia, etc.). Their accounts are subsequently used for transactions which show signs of laundering the proceeds of crime committed abroad. The lawyer of Slovak nationality also involved his own accounts in the schemes in question, and the FSJ was able to document at least three different branches.*

#### Money laundering declared as assistance to Ukraine

*One of the documented cases where the declared motive of the transactions under review was assistance to Ukraine was the crediting of a personal account of a Slovak citizen with high credit payments from an account held in France (credits in the total amount of EUR 750,000.00), which were subsequently withdrawn in cash on the territory of the Slovak Republic (withdrawals in the total amount of EUR 350,000.00). In the above case, a criminal prosecution was initiated for the offence of laundering the proceeds of crime pursuant to Article 233(2b), (5a) of the Criminal Code. At the same time, an order for the seizure of funds in the amount of approximately EUR 500,000.00 should have been issued.*

#### Trade-based money laundering

*A long-term activity of the FSJ (since 2020) has documented a network of transfers showing signs of large-scale economic crime or laundering the proceeds of such activity (so-called trade-based money laundering), which were directed to Poland. In the course of 2022, the documented flows of funds began to be joined by Slovak entities engaged in scrap metal business, but also, for example, in metal production, metal hall contractor, etc. The analysis of documents submitted to Slovak banks revealed other suspicious facts in invoicing, which indicated suspicion of criminal activity also in relation to the Slovak Republic.*

#### Arabela

*In the summer of 2022, the FSJ received, as part of the feedback from EUROPOL, a report on the ARABELA operation carried out in Romania, for which part of the documents were processed by the FSJ in the course of 2021. This was an organised group committing criminal activities (fraud and subsequent laundering) not only on the territory of the Slovak Republic, but also in Germany, Hungary, the Netherlands, the Czech Republic, Spain and Belgium.*

In view of the complexity and lengthiness of the investigative processes within the SR, most new cases are still under investigation or undergoing operational screening and documenting. However, during 2022, the FSJ received feedback regarding previously documented cases in which suspicions identified by the FSJ were confirmed.

In 2022, FSJ did not observe any cases involving suspected FT.

The FSJ reviewed a number of higher risk transactions, particularly in relation to transactions made from/to higher risk countries, e.g.:

- transfer of funds from a high-risk country - Pakistan to the account of a Slovak legal entity,
- transactions carried out in the account of a Slovak legal entity in which a citizen from a high-risk country - Iran acted as a partner and managing director, the transactions were to be related to the purchase of real estate in Turkey,
- transfer of funds from the account of a Slovak natural person to a high-risk country - Cambodia.



## 4 FORECASTS OF ML/FT DEVELOPMENT

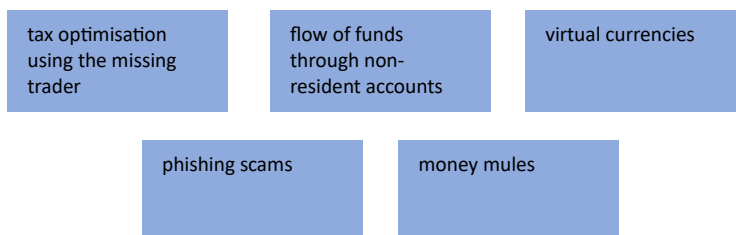
On the basis of past experience and observed trends, it can be assumed that in the coming period the overall developments will be influenced by the high inflation rate and the financial burden on the population related to price increases, as well as the continued uncertainty arising from the conflict in Ukraine. It is also possible to expect a decline (or at least a peak) in the influence of virtual currencies, given the negative information from abroad (cryptocurrency exchange collapse, US prosecution of Binance), as well as the forthcoming European legislation, which should provide a unified regulatory framework for entities trading in virtual currency.

The Slovak Republic introduced compulsory taxation of the proceeds from VA only in 2018 under the amendment to Act No. 595/2003 Coll. on income tax at the rate of 19% or 25% depending on the amount of income, as well as health insurance contributions on the income from the sale of VA at the rate of 14%. This taxation was one of the highest in the whole EU and was quite often criticised by the professional public. Since 2022, a draft amendment to the act has been under preparation to change the taxation of VA income. The most significant proposed change is the introduction of the so-called *time test*, which means that after holding VA for more than 1 year, conversion to fiat currency or stablecoin is taxed at a rate of only 7% and the obligation to pay health insurance contributions on the income from the sale of VA is eliminated. When holding VA for less than 1 year, the tax liability remains unchanged.

The absence of special legal regulation in the VA/VASP segment in Slovakia allows business in the area of provision of services with VA on the basis of obtaining a regulated trade licence by registration in the trade register. Along with the absence of special legislation, there is also the absence of any licencing process and therefore a trade licence is issued to anyone who is 18 years of age, has a full secondary education and does not have a criminal record. In practice, the Trade Licencing Authority has only been given the registration requirement for VASPs without any licencing process.

One of ML/FT threats is the absence of technological solutions in VA routing. This, coupled with the introduction of lower taxation of VA proceeds, may lead to abuse of the Slovak Republic in tax and money laundering schemes.

### Forecast of ML trends



Based on the analysis of the obtained information and current events in the Slovak Republic, it is possible to assume the following trends in the field of ML/FT:

- \* the continuation of the perpetration of tax crimes aimed at tax optimisation with the use and involvement of the so-called missing trader represented most often by shell and fictitious companies, in which either a so-called straw man or a citizen of another country with no ties to the Slovak Republic acts as a statutory body, in complex transaction schemes of large, market-established firms actually doing business;

- \* the use of business and personal bank accounts of non-residents for the transit of funds derived from criminal activities committed abroad through the territory of the Slovak Republic to accounts held abroad;
- \* the use of virtual currency purchases, electronic payment gateways and foreign fintech bank products to make it more difficult to document the flow of funds obtained through criminal activity;
- \* the trend of so-called “phishing scams” targeting the socially and economically weaker segments of the population in the context of the overall social situation associated with the increasing cost of living of the population may also culminate in the coming period, while the occurrence of various types of its variations can also be assumed;
- \* the continuing trend of “money mules” fraud;
- \* terrorist financing through transactions carried out through current bank accounts will rather follow a downward trend, also in view of the new possibilities emerging through online payment gateways or the possibilities provided by anonymised instruments used for the transfer of virtual currencies (transfers to privacy coins, the use of mixers, etc.), as well as in view of the global trend in the development of terrorist offences, which have been rather random and less financially demanding in the last few years.

## **5 CONTROL ACTIVITIES OF THE FSJ**

The KPO ensures the control of the fulfilment of the obligations arising from the AML Act for obliged persons. In addition to the annual control plan, which was compiled on the basis of comprehensive information of the FSJ in the field of ML/FT, respecting the risk-based approach in relation to individual sectors, products, distribution channels and specifics of particular obliged persons, the basis for the controls was also information and suggestions received from other branches of the PF, other administrative bodies or from natural persons and legal entities.

The control activity is carried out on the basis of the annual control plan, but the FSJ also reacts promptly and actively to new methods and trends by carrying out 'ad hoc' inspections.

In 2022, KPO staff conducted 17 controls of obliged persons, at real estate agencies, currency exchange offices, auction rooms, precious metals dealers, securities traders, accountants, virtual currency service providers, and non-profit organisations. In one case, the control was completed with the imposition of a sanction in the form of a fine of EUR 25.000.00. As the control did not reveal any serious deficiencies in the fulfilment of AML obligations, six controls from 2022 were completed without imposing a sanction. In the remaining cases, the control is still ongoing or an administrative procedure for the imposition of a sanction is underway.

**Table No. 6**  
**Statistics on sanctions imposed in 2022**

<b>Obligated person/field of activity</b>	<b>Type and amount of sanction (in EUR)</b>
Gambling operator	100,000.00/ publication of the decision
Currency exchange office	150,000.00/ publication of the decision
Real estate agency	50,000.00/ publication of the decision
Transport of cash	100,000.00/ publication of the decision
Notary	25,000.00/ publication of the decision
Auction company	15,000.00/ publication of the decision
Organisational and economic adviser	50,000.00/ publication of the decision
Cash transactions over EUR 10,000.00	20,000.00/ publication of the decision
Real estate agency	25,000.00/ publication of the decision
Bank	2,000,000.00/ publication of the decision

Source: KPO



Furthermore, the FSJ, as the administrative authority, issued seven decisions in 2022 in administrative procedures initiated in 2021, imposing fines totalling EUR 2,260,000.00 and two decisions in cases initiated in 2020, imposing fines totalling EUR 250,000.00. In all of the above cases, the sanction of publishing the final decision verdict on the FSJ website was also imposed.

The most frequent administrative offences committed by the obliged persons consisted in failure to exercise customer due diligence, failure to ascertain the origin of funds, failure to assess transactions in terms of their unusualness, failure to refuse to execute specific transactions during the notice period despite the suspicion of money laundering, failure to report UTs without undue delay to the FSJ, as well as failure to prepare the mandatory elements of the programme of their own activities. In one case it was a failure to provide the necessary assistance to the FSJ during the control.

Compared to previous years, the amount of fines imposed has increased, as a result of compliance with EU law obligations and FATF recommendations which require that effective, proportionate and dissuasive administrative sanctions are imposed in the event of systematic AML breaches.

As part of its cooperation with national supervisory authorities, the FSJ carried out one joint control with the Gambling Regulatory Authority of a gambling provider.

*Fines imposed by the FSJ accounted for 12% of the total amount of fines imposed by the Police Force of the Slovak Republic in 2022.*

**Table No.7**  
**Control of obliged persons in numbers**

<b>Year</b>	<b>Number of new controls</b>	<b>Number of issued decisions</b>	<b>Amount of fines imposed in EUR</b>	<b>Number of final decisions published on the FSJ website</b>
2018	10	10	76,700.00	0
2019	12	5	18,300.00	0
2020	10	5	65,500.00	0
2021	15	6	1,597,000.00	1
2022	17	10	2,535,000.00	10

*Source: KPO*

### The case of the imposition of a sanction on a bank

*In the administrative procedure, the FSJ issued a decision imposing an aggregate fine of EUR 2,000,000.00 on the obliged person and imposed the sanction of publication of the final decision on the imposition of the fine<sup>3</sup>.*

*In the decision, the FSJ identified breaches of obligations in relation to 37 customers. In particular, the breaches consisted in the fact that the obliged person did not exercise basic and also enhanced customer due diligence during the audited period to the extent provided for by the AML Act, did not assess transactions in terms of their unusualness, did not pay special attention to the transactions and to each ML/FT risk, did not terminate the business relationship with immediate effect or refuse to execute specific transactions during the notice period and did not report without undue delay to the FSJ UTs despite the fact that they fulfilled some of its attributes set out in its programme of own activities as well as in Article 4 of the AML Act (the transactions were unusually large, of an unusual nature and the volume of funds was clearly disproportionate to the nature of the business or the declared assets of the customers). The amount of undeclared funds that met the attributes of an UT was EUR 878,207,622.00 for 36 customers, the amount of unrejected transactions after the immediate termination of the business relationship due to suspicion of ML was EUR 70,837,625.00 for 10 customers, while the total credit movement on the accounts of the customers in question amounted to approximately EUR 1.36 billion.*

*In the course of the audit, the FSJ found, similarly to another bank, the use of transit accounts, the so-called "proxy networks", which can be considered the most common and most serious method of professional ML, in particular through the network of shell companies. The customers' transactions in question generally involved a coordinated group of personally and transactionally related entities, large cash deposits and suspicious transactions directed to Asia, in particular to China and Hong Kong. The FSJ noted a significant international and flow-through nature of transactions to/from destinations with weak AML/CFT/CPF regimes. There were also unusual transactions by a closely coordinated network of dummy traders in receivables through offsetting and the recognition of fictitious liabilities in the context of insolvency proceedings. The transactions also involved the dubious control of a foreign engineering giant through off-shore companies, as well as deals in virtual currencies.*

*The payment arrangements found on most of the business accounts of the bank's customers indicated that they were entities operating in a coordinated group, making payments according to a pre-designed and agreed scheme, which was characterised by the accumulation of funds from unknown sources and their final transfer, mainly abroad, in order to make it difficult to ascertain the real origin of the funds, or to obscure the financial flow. The abovementioned misconduct of the obliged person allowed the stratification or integration of funds on a large scale within the financial system with subsequent transfer outside the Slovak Republic.*



<sup>3</sup> [https://www.minv.sk/swift\\_data/source/policia/fsj/kpo/AVR365.pdf](https://www.minv.sk/swift_data/source/policia/fsj/kpo/AVR365.pdf)

## 6 LEGISLATIVE ACTIVITIES

In 2022, the KPO Department participated in the legislative process in relation to the transposition of the Information Directive<sup>4</sup> and Article 32a of 5AMLD<sup>5</sup>, which requires Member States to establish centralised bank account registers or data retrieval systems to enable the timely identification of persons holding bank and payment accounts.

On 1 May 2022, Act No. 123/2022 Coll. on the Central Register of Accounts and on the amendment to certain acts entered into force, the main objective of which was to transpose the above-mentioned directives as well as to incorporate the requirements of the European Commission regarding the incorrect transposition of the revised 4AMLD<sup>6</sup>.

After a thorough analysis of several options, as well as on the basis of recommendations from the European Commission and following the example of most EU Member States, it was decided to set up a Central Register of Accounts (CRA). The register will be used to provide authorised public authorities (e.g. FSJ, LEAs, criminal courts, intelligence services, etc.) with data in electronic form in a direct, continuous and remote manner. The Ministry of Finance of the Slovak Republic will be the administrator and operator of the CRA, while the National Bank of Slovakia will supervise the fulfilment of the obligations of financial institutions in relation to the CRA. In connection with the introduction of new obligations for financial institutions, the AML Act provides for the possibility to impose a fine of up to EUR 500,000.00 on a financial institution in case of non-compliance, and up to EUR 1,000,000.00 in case of repeated breaches of the Act.

The amendments to the AML Act have modified and clarified the existing AML/CFT/CPF rules, modifying some sub-aspects to meet the requirements of a correct and complete transposition of the 4AMLD4 and 5AMLD and the FATF recommendations, in particular on the exercise of due diligence. The penalties in the form of a fine (at least twice the amount of the benefit resulting from the infringement or 10% of the total annual turnover) have also been strengthened. Important changes have been made in particular for the FSJ, which has been obliged to carry out financial and strategic analyses.

In order to increase legal certainty and operational efficiency, rules have been laid down to strengthen the FSJ's cooperation with the relevant national and foreign authorities in the exchange and examination of financial information and financial analyses necessary for the prevention, detection, investigation and prosecution of serious crime.

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<sup>4</sup> Directive (EU) No. 2019/1153 of the European Parliament and of the Council of 20 June 2019 laying down rules facilitating the use of financial and other information for the prevention, detection, investigation or prosecution of certain criminal offences, and repealing Council Decision 2000/642/JHA

<sup>5</sup> Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018 amending Directive (EU) 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, and amending Directives 2009/138/EC and 2013/36/EU

<sup>6</sup> Directive (EU) 2015/849 of the European Parliament and of the Council of 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Regulation (EU) No 648/2012 of the European Parliament and of the Council, and repealing Directive 2005/60/EC of the European Parliament and of the Council and Commission Directive 2006/70/EC

Furthermore, in 2022, the FSJ, as national experts for the Ministry of Interior of the Slovak Republic, actively participated and cooperated in the working group of the Council of the EU – “Working Party on Financial Services and the Banking Union – AML” on the so-called new AML package (6AMLD and related regulations proposed by the European Commission<sup>7</sup>).

## **7 NATIONAL RISK ASSESSMENT**

The development of a National Money Laundering and Terrorist Financing Risk Assessment is required by the provisions of Article 26a of the AML Act. The NRA process is followed by the development of an Action Plan, which is a major step in the national fight against ML/FT/FP. The whole process of the second update of the NRA was completed at the end of 2021 with the submission of the Action Plan for approval by the Government of the Slovak Republic.

At the beginning of 2022, the “Action Plan for Combating Money Laundering, Terrorist Financing and Financing of Proliferation of Weapons of Mass Destruction with a view to 2024” (the Action Plan) was adopted by Government Resolution No. 8 of 12 January 2023. The Action Plan aims to implement measures to mitigate and eliminate ML/FT/FP risks identified in the Final Report of the Second NRA.

At the same time, the Action Plan strengthens inter-ministerial cooperation, cooperation between public and private institutions, raises awareness of measures to combat ML/FT/FP and provides an ambitious approach based on prevention, education and effective enforcement of regulatory measures to reduce vulnerabilities in the AML/CFT/CPF system.

*The third round of the NRA update will take place in the period 2023-2024.*

### **7.1 VA/VASP**

The FSJ, as the supervisory authority for AML/CFT/CPF, closely monitors the virtual assets (VA) sector and virtual asset service providers (VASPs) in the SR. Due to its extraordinarily dynamic development and extremely fast adaptability, the VA sector is perceived as a sector with significantly increased risk. What was once a fringe sector with only a small group of computer enthusiasts has become a multi-billion-dollar market. Adoption of cryptocurrencies is on the rise among the population. Predictions say that with the more significant entry of Generation Z (the young, tech-savvy generation) into the market, cryptocurrency adoption will continue. As adoption grows, it is understandable that the propensity for abuse, such as the various honeypot, pump and dump, rug pull, and other scams, will also grow.

It is also important to see the emergence and development of other VA and the associated development of other networks, beyond Bitcoin. The launch of new coins on the market (the so-called ICO - Initial Coin Offering) tends to be associated with the threat of scams. Many times, new coins are launched with the sole purpose of scamming the user and making money for the creator. There are many technological possibilities for creators.

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<sup>7</sup> [https://finance.ec.europa.eu/publications/anti-money-laundering-and-countermeasures-financing-terrorism-legislative-package\\_en](https://finance.ec.europa.eu/publications/anti-money-laundering-and-countermeasures-financing-terrorism-legislative-package_en)

Examples include high “sales tax”, pump and dump (artificially pushing up the price and then selling it), liquidity constraints on sales, and various others.

One of the key factors is clearer and more precise definition and regulation within the framework of legislation not only at national but also at international level. The unquestionable advantage of cryptocurrencies and, of course, from the point of view of the supervisory authorities, the biggest threat is the “transnationality” of cryptocurrencies and their flexibility to react to any regulation.

The Slovak Republic has taken only basic steps to regulate and supervise the VA/VASP market. According to the current legislation, a VASP can only carry out a given activity provided that it has the relevant trade licence. Details on the notification, types and scope of trades are regulated by Act No. 455/1991 Coll. on trade business and on the amendment to certain acts, as amended (Trade Licencing Act). The registration of the data specified by the Trade Licencing Act is carried out by district offices, Department of Trade Licencing.

The VASP must have the relevant authorisation under the Act and must also carry out the activity in question for third parties. By fulfilling these conditions, it becomes an obliged person pursuant to Article 5(1)(o) and (p) of the AML Act.

In 2022, the FSJ conducted supervision for AML/CFT/CPF in an exemplary manner and cooperated with the various VASPs on reported UTs.

The process of registering a VASP business itself is extremely straightforward, unlike across Europe. In the Slovak Republic, the whole process is just applying for the activity in question under the Trade Licencing Act. Therefore, the total number of VASPs in the Slovak Republic in 2022 was over 550. However, the activity itself was actually carried out by around 50 entities.

It is important to re-emphasise that cryptocurrencies know no borders and therefore it is important to act in a coordinated manner at international level.

Cryptocurrencies could be an ideal vehicle for ML/FT/FP due to their “transnational” and “global” nature, as well as their easy transferability.

Following the Russian Federation’s attack on Ukraine, the FSJ perceives threats associated with the VA to circumvent sanctions. The Russian Federation has been facing systematic sanctions from the West for over a year now and has moved very significantly in the cryptocurrency support segment. An example is Sberbank’s efforts to launch its own decentralised exchange called DEX<sup>8</sup>. Several foreign agencies have warned of the threats associated with VA, especially in connection with the so-called stablecoins (tokens whose value is linked to FIAT currency) in circumventing sanctions and transfers of Russian capital abroad. In this case, the FSJ perceives not only AML/CFT/CPF-related threats, but also geopolitical-security threats.

The FSJ perceives anonymous coins as the riskiest in terms of ML/FT/FP. The anonymity of these coins, and the very limited ability to track them, gives them a clear technological advantage over any efforts by LEAs to map or control them by regulators.

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<sup>8</sup> <https://cryptoslate.com/russia-based-sberbank-to-launch-defi-platform-on-ethereum/>



As regards the threats associated with exchanges, the FSJ sees on the one hand a positive trend of centralised exchanges to tighten customer due diligence, to scrutinise the persons concerned, the origin of their funds and to supervise transaction flows more strictly. On the other hand, thanks to the development of atomic swaps (the possibility of exchanging VA on different networks) and the development of peer - 2 - peer exchanges via DEX (decentralised exchanges), a new threat is emerging on the market, one that has not yet been explored by financial intelligence units around the world.

Recent events in world geopolitics (the war in Ukraine) show that the growth of DEXs in Russia reflects the very challenging supervisory performance of Western countries in this segment.

Based on the evolution of ML/FT/FP risks, the FSJ is currently working on a sector analysis of VA and VASP aimed at identifying risks, methods and trends in this area in the territory of the Slovak Republic.

## **8 TRANSPORT OF CASH**

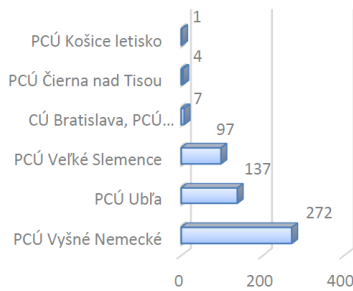
On the one hand, findings of law enforcement authorities show a downward trend in the use of financial cash by consumers, but on the other hand, it remains the tool of first choice for more sophisticated use in the ML/FT field. It can be used by perpetrators of this type of crime for quick transactions and transfers of funds between entities, as wire transfers leave a footprint in the digital space and tracing entities between transactions is easier. One of the EU's priorities is to promote the harmonious, sustainable and inclusive development of the internal market as an area in which people, goods, services and capital can move freely and securely, thus ensuring prosperity in the trading space.

*There has been a 606% year-on-year increase in the transport of cash across the external borders of the Slovak Republic.*

In 2022, the FSJ received 586 notifications of cash in transit totalling EUR 36,837,637.43. By comparison, in 2021, the FSJ received 83 notifications totalling EUR 2,812,308.74. The increase is mainly due to the ongoing conflict in Ukraine and the related increased migration of the population, not only to the territory of the Slovak Republic, but also to neighbouring countries.

Of the total number of notifications received, 518 were in the context of entries into the territory of the Slovak Republic. Most of them were received from the Customs Office (CÚ) Michalovce, a branch of the Customs Office (PCÚ) Vyšné Nemecké. The border crossing point Vyšné Nemecké served exclusively for passenger and freight transport without restrictions, while on 15 September 2022 the exception adopted after the outbreak of the conflict in Ukraine in February 2022, on the basis of which the crossing point also served pedestrians, as it was the main transit point used by the departees from Ukraine, was abolished.

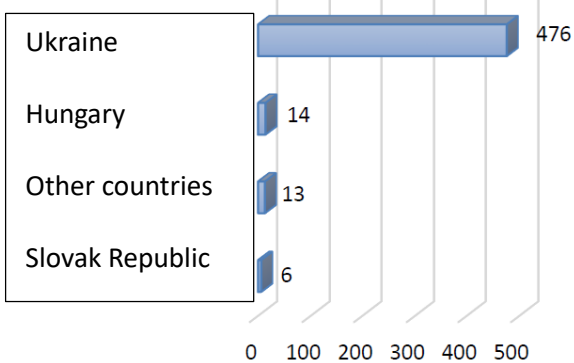
Chart No.2 Received notifications in the context of entries into the territory of the Slovak Republic



Source: Analytical Unit

The Slovak Republic was the most frequently mentioned country of destination in the notifications in the context of entry into the Slovak Republic, in 284 cases. This was followed by the Czech Republic - 69 times, Poland - 36 times, Germany - 30 times, Austria - 26 times, Italy - 14 times, Spain and Hungary - 8 times, Switzerland - 7 times, Turkey - 6 times, Great Britain and the USA - 5 times, France 3 times, and one or two other countries, mostly from Europe.

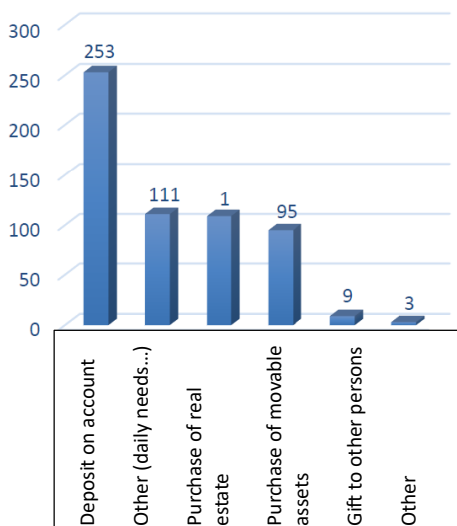
Chart No.3 Nationality of cash carriers



Source: Analytical Unit

There were 68 notifications received on exit from the Slovak Republic back to the territory of Ukraine, with a total of EUR 1,357,694.64 in cash exported. The highest number of notifications received was from the PCÚ Vyšné Nemecké with 33. This was followed by notifications from the PCÚ Veľké Slemence with 24 notifications received, 7 from the CÚ Bratislava, PCÚ Airport - travel and 4 notifications from the PCÚ Ubľa.

Chart No.4 Purpose of the use of funds on the basis of the declaration of obliged persons



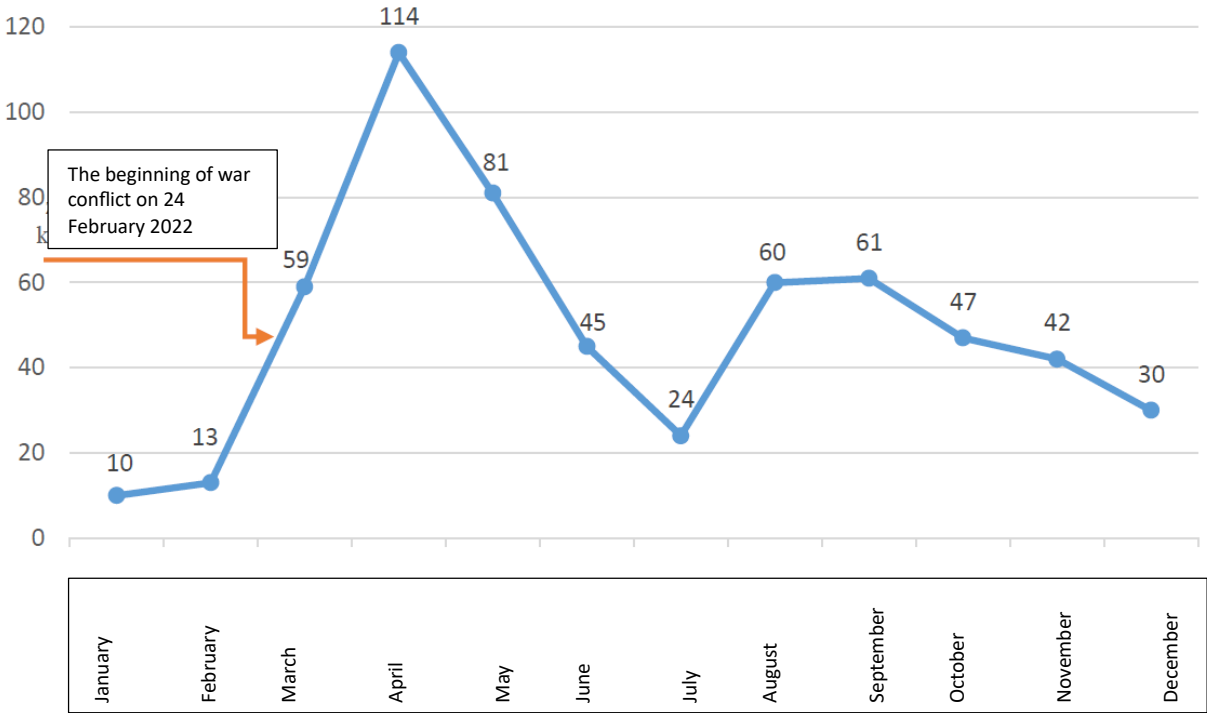
Source: Analytical unit

In 430 cases, the verification of incoming notifications was concluded by considering them closed, which is the most frequent way of concluding the verification of incoming notifications, 73% of the total. In 124 cases a risk profile was set up by the Customs Department of the Financial Directorate of the Slovak Republic on the persons concerned in their information system. Out of the total number of notifications received, 27 spontaneous notifications were sent to foreign FIUs (Czech Republic, Poland, Austria, Hungary, Croatia, Germany and Italy). In five cases, the FSJ requested the competent customs authority to give its consent for the exchange of information between the FSJ and the FIU Ukraine. In 3 cases information was sent to the Slovak Information Service and Military Intelligence, in 2 cases the information was forwarded to LEAs.

Abuse of products in the Slovak Republic

*As a possible link to ML/FT, abuse of the set system was identified in relation to the online purchase of electronic fee stamps (can be purchased anywhere, any quantity and paid by transfer via another currency) and their subsequent sale/return at branches of the relevant institutions in the Slovak Republic (sales paid in cash in EUR). The possibility of sending a cheque in any currency other than EUR, paid by credit card, and then cashing the cheque at a branch of Slovenská pošta, a. s. (postal undertaking) is also used. These are repeated transactions in the case of individual entities, with more than hundreds of visits to branches of Slovenská pošta, a. s., in volumes reaching hundreds of thousands of EUR (according to operational findings, one person was able to cash cheques in the amount of approximately EUR 1.7 million in this way over a period of approximately one month).*

Chart No.5 Evolution of notifications received in 2022



Source: Analytical Unit

A similar problem, mainly related to the increased transit of Ukrainian citizens, has also been noted in border towns by banking institutions, which have registered a disproportionate increase in cash withdrawals via ATM cards over the last period. These persons carry multiple payment cards and use them repeatedly to withdraw cash in EUR. The volume of card withdrawals by one Slovak bank alone was approximately EUR 8.6 million in two months. The above makes it necessary for the customs authorities at the border crossing point to identify the payment cards and to establish which ones are linked to an account and which ones are prepaid and the cash on them needs to be reported.

The number of entities crossing our external border has increased. The almost sevenfold increase in the number of cash transport notifications received as a result of increased transit, particularly of those leaving Ukraine as a result of the conflict and the resulting poor situation in their country, brings with it the threat of abuse of the situation. This creates the risk of misuse of funds for ML/FT.

## 9 NATIONAL AND INTERNATIONAL COOPERATION

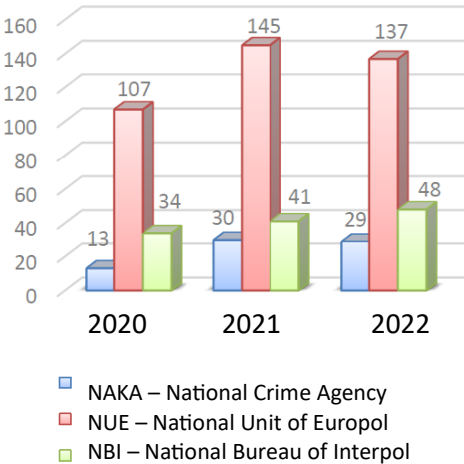
### 9.1 NATIONAL COOPERATION

In 2022, the FSJ developed its cooperation with national authorities in the joint fight against ML/FT/FP. This has led to positive results of LEAs and other authorities. The FSJ continued to be able to carry out high quality analyses of the information obtained and secured, which it further disseminated in accordance with the AML Act.

#### 9.1.1 Requests

In 2022, the FSJ executed a total of 238 requests from Police Force units, which is approximately the same amount as in 2021. The FSJ received the largest number of requests from the NAKA, the NUE and the NBI, with a total of 214 requests. This number maintained the trend from the previous period.

Chart No.6 Overview of executed requests in 2020-2022



Source: International Cooperation Unit

The requests received in the reporting year were of a general nature and related mainly to the offence of money laundering and related predicate offences. These mainly involved various types of fraud committed by means of electronic communication (CEO fraud, phishing, investment fraud, advance payment scam), fraud in connection with virtual assets, tax offences and, in a few cases, offences related to the conflict in Ukraine (offence of abuse of power of a public official linked to suspected financing of arms purchases committed by a criminal group, etc.).

In connection with other requests sent by the Police Force units (in particular NAKA and NCODK), in connection with suspicions of ML and related predicate offences (97 requests in total), the FSJ, through the International Cooperation Unit, obtained information from a total of 5 foreign financial intelligence units. It was subsequently analysed and forwarded to the requesting unit.

### **9.1.2 Criminal proceedings for ML/FT**

On 1 February 2022, the NCODK was established, within which the Financial Investigation Department was also established. The NCODK, as a newly established unit within the Police Force, and specifically its Financial Investigation Department within its substantive competence, cooperates closely with the FSJ in the framework of mutual exchange of information, collecting, maintaining and evaluating information sent from the FSJ and also conducting statistical data collection.

The Financial Investigation Department of the NCODK also cooperates closely with the FSJ in order to obtain additional or further information on entities in ongoing criminal proceedings through foreign partners, foreign financial intelligence units.

*In 2022, a total of 39 persons were convicted of ML and a total of EUR 22,078,671.23 in property was seized.*

In 2022, a total of 76 individuals were prosecuted for ML in the Slovak Republic, which represents a slight increase compared to 2021 with 73 prosecuted persons. Furthermore, in 2022, a total of 58 persons were charged with ML and a total of 37 persons were convicted of ML, which represents an increase of 8 persons compared to 2021. At the same time, in 2022, criminal proceedings were carried out against 3 legal persons for this crime<sup>9</sup>. No natural or legal persons were convicted of FT in the Slovak Republic in 2022<sup>10</sup>.

### **9.1.3 Interministerial Coordination Body**

One of the MEKO groups is NES-LP. This group met six times during 2022. The main themes of the meetings were based on the need to plan and coordinate actions to address the targeted gaps identified in the 5th round of mutual evaluations of States by the MONEYVAL Committee of Experts. The sub-group on addressing FT and FP did not meet in 2022.

## **9.2 INTERNATIONAL COOPERATION**

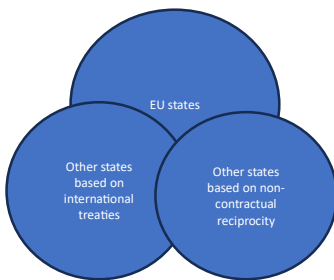
An important part of an effective fight against ML/FT/FP is the exchange of information at international level between financial intelligence units. In the organisational structure of the FSJ, the International Cooperation Unit is responsible for this area and aims to develop and strengthen this international cooperation with financial intelligence units worldwide. The vast majority of ML/FT/FP offences are cross-border in nature.

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<sup>9</sup> Source: General Prosecutor's Office of the Slovak Republic

<sup>10</sup> Source: Ministry of Justice of the Slovak Republic

With whom does the FSJ exchange information?



The legislation of the Slovak Republic as well as international treaties binding on the Slovak Republic allow the FSJ to exchange information with the competent authorities of other states, either by way of requests or by spontaneous sending of information.

International cooperation, apart from the exchange of information in specific cases under examination, also includes the exchange of experience, best practices and participation in international working groups and organisations. The exchange of information with partner foreign financial intelligence units takes place via the secure communication network FIU.net (EU Member States) and Egmont Secure Web (other countries and/or EU Member States).

The FSJ is also an active member of international committees, groupings and working groups such as MONEYVAL, the Expert Group on Money Laundering and Terrorist Financing (EGMLTF), EGMONT GROUP, EU FIUs' Platform (under the European Commission), the Conference of the Parties to the CETS 198 (the Warsaw Convention), the Working Party on Financial Services and the Banking Union - AML (under the Council of the EU), AMON (Europol).

*The FSJ, in cooperation with GLOBSEC, organised the highly successful and appreciated "V4+ Regional Conference of Financial Intelligence Units" in Bratislava in September 2022*

In 2022, the FSJ cooperated most intensively with partner FIUs in the field of mutual information exchange as follows: Belgium (330 times), Czech Republic (197 times), Ukraine (139 times), Hungary (123 times), Lithuania (117 times), Luxembourg (103 times). Although in recent years the FSJ's cooperation has been most intensive with financial intelligence units of neighbouring countries (mainly Czech Republic, Hungary), a certain change in this trend has been mainly due to two factors: Russia's aggression on the Ukrainian territory as well as the increased intensity of cross-border reporting of suspicious/unusual transactions by payment and other institutions providing services on the territory of the Slovak Republic on the basis of the free movement of services in the EU.

#### Case of international cooperation

*In February 2022, in cooperation with the FIU in Luxembourg, funds worth approximately EUR 39.600.000.- were withheld. There was reasonable suspicion of ML in the case and the owner of the funds was a Slovak oligarch prosecuted in the Slovak Republic for a corruption offence, where the court could decide to forfeit all the accused person's assets as part of the criminal proceedings.*

In 2022, within the framework of international cooperation, a total of 8 UT delays in the amount of EUR 39,857,790.00 were executed abroad and 1 UT delay in the amount of EUR 5,465.70 was executed in a Slovak bank account.

**Table No.8****Overview of exchange of information within international cooperation of the FSJ**

Year	Number of requests sent abroad*	Number of requests executed from abroad	Number of disseminations abroad**	Number of disseminations relevant for the SR received from abroad
2022	240	250	488	724
2021	177	231	391	612
2020	237	250	417	278

Source: statistical data of the FSJ

\* "Includes both FSJ's own requests and requests executed for LEAs of the SR"

\*\* "The number of disseminations transferred to foreign FIUs includes the total number of disseminations transferred, not only the number of disseminations obtained from UT reports (information obtained by own activities, additional information, etc.)."

### 9.3 EVALUATIONS OF THE FSJ

#### 9.3.1 MONEYVAL

As a member of the Council of Europe, the Slovak Republic is regularly assessed by the MONEYVAL Committee of Experts with regard to ensuring compliance with the FATF recommendations. In 2022, the Slovak Republic took steps to make the regime of combating ML/FT/FP more effective and stronger by addressing the shortcomings identified in the 5th round of mutual evaluation of States.

The 64th Plenary Meeting of MONEYVAL in Strasbourg, France, took note of the 1st Enhanced Follow-up Report of the SR. Slovakia achieved a rating upgrade for a total of four recommendations, while Slovakia was downgraded for one recommendation due to changes in FATF recommendations and standards. By the end of 2022, the 2nd Enhanced Follow-up Report of the SR was under preparation.

*The second report on the progress of the Slovak Republic in addressing the technical compliance deficiencies will be approved by the MONEYVAL Plenary in Strasbourg in December 2023.*

The SR will continue its efforts to address the remaining gaps and report to MONEYVAL on progress in strengthening the implementation of AML/CFT/CPF measures. These efforts also include activities aimed at aligning national legislation with European Union legislation and international FATF standards.

#### 9.3.2 European Commission

The European Commission has carried out an evaluation of the implementation of the 4AMLD by the Slovak Republic. The course of the implementation evaluation was coordinated and covered by the FSJ, while the cooperation of the National Bank of Slovakia, the Gambling Regulatory Authority, the Ministry of Justice of the Slovak Republic, the General Prosecutor's Office of the Slovak Republic, as well as various professional chambers, associations and societies was also ensured. The results of the overall EU evaluation were not yet known as of 31 December 2022, while the partial evaluations of the individual Member States are taken into account in the final evaluation report.

### **9.3.3 TSI Project of the European Commission**

A number of workshops and conferences have been held within the TSI project. Representatives of the FSJ participated in these conferences as active contributors.

*The Technical Support Instrument (TSI) is an instrument of the European Commission to provide technical support for reforms in EU Member States based on requests from national authorities.*

The first official workshop focused on strengthening the effectiveness of the Slovak Republic in the field of ML/FT. At the workshop, an expert report and recommendations on improving the NRA Report for the period 2016-2019 were presented. At the same time, the Council of Europe's methodology on NRA was presented to the Slovak Republic at the workshop in question, which the SR later decided to use in the development of the next NRA (for the period 2020-2023).

Another workshop within the project focused on improving the strategic principles and developing a national strategy to combat ML and the resulting National Action Plan to Combat Money Laundering.

Other workshops focused on strengthening and streamlining the Register of Beneficial Ownership, where experts from the Council of Europe assessed the legal and institutional situation in this area in the Slovak Republic. As a result of these findings, an expert report was provided to the Slovak Republic with a view to making improvements in this area and setting up an effective control mechanism.

At the next workshop, the discussion focused on sectoral risk assessment in relation to legal persons. The workshop enabled the authorities concerned to optimise their risk assessment processes by applying the Council of Europe's recommendations for assessing the risks of legal persons in their own jurisdictions, and the skills acquired will be used to update their understanding of national risks and to develop effective responses to these risks.

Other topics at the 2022 TSI workshops included sectoral risk assessment in relation to VASP and sectoral risk assessment in relation to proliferation.

### **9.3.4 European Banking Authority**

At the end of 2022, the FSJ was subject to assessment and evaluation by the EBA. The FSJ's approach to AML/CFT supervision of banks and the measures taken by the FSJ in this respect for the period from January 2019 to November 2022 were assessed. The on-site assessment team interviewed representatives of the FSJ and the National Bank of Slovakia, as well as representatives of selected banks. The conclusions of the evaluation will form part of a report to be prepared by the EBA with a view to improving the activities carried out by the FSJ in the area of AML/CFT supervision of banks.



## 10 FSJ AND PREVENTION



### 10.1 TRAINING ACTIVITIES OF THE FSJ

Due to the continued need for education and information sharing between the FSJ and obliged persons, FSJ officers continued to train obliged persons in 2022. The trainings were mainly focused on financial sector entities, specifically on clarifying the correct procedure for detecting and reporting UTs in the conditions of obliged persons.

A total of nine trainings were conducted for banks and the Slovak Banking Association, others were conducted for representatives from the gambling, real estate, VASP, Slovenská pošta a.s. and building savings bank sectors.

Furthermore, synergy meetings were held with representatives of the Anti-Fraud Department of the Financial Directorate of the Ministry of Finance of the Slovak Republic, aimed at improving the level of information exchange and the efficiency of the use of FSJ information in the activities of the tax administrator.

### 10.2 QUALIFIED REQUESTS

Within the framework of methodological activities, in 2022, the KPO Unit provided consultations to obliged persons, drafted a total of 26 responses to qualified requests on the interpretation of the relevant provisions of the AML Act in order to eliminate application problems that arose in the practical activities of obliged persons or related to ambiguous interpretation of individual provisions of the AML Act.

In the context of licencing and prior approvals, the KPO Unit provided the National Bank of Slovakia with a total of 22 responses to requests for the provision of documents on specific proceedings. The KPO Unit staff also participated in the organisation of several trainings for obliged persons, including several banks, the Slovak Chamber of Tax Advisors, the Slovak Chamber of Auditors, the Chamber of Notaries of the Slovak Republic, etc.

### 10.3 METHODOLOGICAL GUIDELINES FOR OBLIGED PERSONS

As part of its methodological work, the FSJ developed and published three methodological guidelines during 2022. The “Guideline on the content of the programme of own activities of the obliged person pursuant to Article 20(2)(a) to (k) of Act No. 297/2008 Coll. for obliged persons pursuant to Article 5 of Act No. 297/2008 Coll. and its application in practical activities” was primarily focused on practical application problems encountered by obliged persons when drawing up and following up the

programme of own activities against ML/FT. The guideline discusses the different parts of the programme pursuant to Article 20(2)(a) to (k) of the AML Act.

Furthermore, the FSJ developed and published the “Guideline of the Financial Intelligence Unit of the Presidium of the Police Force for obliged persons on identification and verification of identification pursuant to Act No. 297/2008 Coll.”, which was a response to the armed conflict in Ukraine and its unfavourable development, which resulted in the mass migration of foreigners to the territory of the Slovak Republic. The given guideline responded to the application problems in connection with the application of the provisions of Article 7(1)(a) and Article 8(1)(a) of the AML Act, i.e. identification and verification of identification of natural persons in the context of carrying out the respective customer due diligence by the obliged person.

In the course of 2022, the FSJ also developed and published the “Guideline on the fulfilment of obligations under Act No. 297/2008 Coll. for legal persons and natural persons - entrepreneurs providing cryptocurrency wallet and cryptocurrency exchange services, which are classified as obliged persons pursuant to Article 5(1)(o) and (p) of Act No. 297/2008 Coll.”, whereby the FSJ promptly responded to specific application problems of obliged persons providing their services in the field of VA. The content of the guideline is an interpretation of the relevant provisions of the AML Act with an emphasis on the specificities of the VA sector as well as the risks that the sector entails. As in previous years, the FSJ continued to maintain an updated list of significant public functions of politically exposed persons under Article 6(2) of the AML Act on its website during 2022. At the same time, in 2022, the FSJ updated several pieces of information for obliged persons posted on the website, such as UT reporting templates, risk indicators for VA service providers, etc.

## Overview of selected statistical data

Table No.9

Overview of selected statistical data for 2018 – 2022

	2018	2019	2020	2021	2022
Number of UT reports received	2509	2576	2008	2042	2185
Number of UT reports referred to LEAs	252	219	177	189	249
Number of delayed UT reports referred to LEAs	44	43	71	63	81
Number of referrals to the Financial Directorate of the SR	980	829	702	715	547
Number of requests from abroad	240	236	250	231	250
Number of requests sent abroad	85	125	237	177	240
Number of spontaneous disseminations from abroad	420	131	278	612	724
Number of spontaneous disseminations sent abroad	555	502	417	391	488
Number of controls	10	12	10	15	17
Executed requests	149	179	192	239	238
Number of cash transport notifications	230	264	123	83	586
Amount of cash transported (in thous. of EUR)	8132	19625	4010	2812	36837

## List of abbreviations

<b>AML/CFT/CPF</b>	anti-money laundering (AML), countering the financing of terrorism (CFT), and countering proliferation financing (CPF)
<b>CRA</b>	Central Register of Accounts
<b>EBA</b>	European Banking Authority
<b>EGMLTF</b>	Expert Group on Money Laundering and Terrorist Financing
<b>EU</b>	European Union
<b>FATF</b>	Financial Action Task Force
<b>FIU</b>	foreign Financial Intelligence Unit
<b>FSJ</b>	Financial Intelligence Unit of the Presidium of the Police Force
<b>FT</b>	financing of terrorism
<b>FP</b>	financing of proliferation
<b>KPO</b>	obliged persons control
<b>ML</b>	money laundering
<b>MEKO</b>	Interministerial Coordination Body
<b>NAKA</b>	National Crime Agency of the Presidium of the Police Force
<b>NCODK</b>	National Centre for Special Types of Crime of the Presidium of the Police Force
<b>NES-LP</b>	National Expert Group on Anti-Money Laundering and Counter-Terrorist Financing
<b>NRA</b>	national risk assessment
<b>UT</b>	unusual transaction
<b>NUE</b>	National Unit of Europol
<b>NBI</b>	National Bureau of Interpol
<b>LEA</b>	law enforcement authority
<b>OMS</b>	Unit of International Cooperation
<b>TSI</b>	Technical Support Instrument
<b>UNODC</b>	United Nations Office on Drugs and Crime
<b>CLSAF</b>	Centre of Labour, Social Affairs and Family
<b>VA</b>	virtual assets
<b>VASP</b>	virtual asset service provider

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