



United Nations  
Office on Drugs and Crime



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# International Co-operation on Money Laundering Detection, Investigation, and Prosecution Handbook

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The background of the lower half of the cover features silhouettes of four people in business suits. Two people on the left are standing and talking, while two people on the right are standing and looking at a large screen or document. The background is a dark blue world map.

2025



The Financial Action Task Force (FATF) is an independent inter-governmental body that develops and promotes policies to protect the global financial system against money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction. The FATF Recommendations are recognised as the global anti-money laundering (AML) and counter-terrorist financing (CFT) standard. For more information about the FATF, please visit [www.fatf-gafi.org](http://www.fatf-gafi.org).



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## Acronyms

Acronym	Description
<b>AI</b>	Artificial intelligence
<b>AML</b>	Anti-money laundering
<b>AMLA</b>	Authority for Anti-Money Laundering and Countering the Financing of Terrorism
<b>AMON</b>	Anti-Money Laundering Operational Network
<b>ARIN</b>	Asset Recovery Interagency Network
<b>ARO</b>	Asset recovery office
<b>ASEAN</b>	Association of Southeast Asian Nations
<b>CARIN</b>	Camden Asset Recovery Inter-Agency Network
<b>CDD</b>	Customer due diligence
<b>CFT</b>	Countering the financing of terrorism
<b>CIS</b>	Commonwealth of Independent States
<b>CLEO</b>	Collaboration, Learning, Enhancement, Operations
<b>DNFPB</b>	Designated non-financial businesses and professions
<b>EBC</b>	Egmont Biennial Census
<b>EJN</b>	European Judicial Network
<b>ESW</b>	Egmont Secure Web
<b>FATF</b>	Financial Action Task Force
<b>FELEG</b>	Five Eyes Law Enforcement Group
<b>FI</b>	Financial institution
<b>FIU</b>	Financial intelligence unit
<b>GAFILAT</b>	Financial Action Task Force of Latin America
<b>IAP</b>	International Association of Prosecutors
<b>IBAN</b>	International bank account number
<b>IMF</b>	International Monetary Fund
<b>JIT</b>	Joint investigation team
<b>KYP</b>	Know your partners
<b>LEA</b>	Law enforcement authority
<b>ML</b>	Money laundering
<b>MLA</b>	Mutual legal assistance
<b>MoU</b>	Memorandum of Understanding
<b>NCB</b>	National Central Bureau
<b>NPO</b>	Non-profit organisation
<b>OCG</b>	Organised crime group
<b>OST</b>	Operational support team
<b>OTF</b>	Operational task force
<b>PET</b>	Privacy-enhancing technology
<b>PPP</b>	Public-private partnership
<b>RRAG</b>	GAFILAT Asset Recovery Network
<b>RTMG</b>	Risk, Trends and Methods Group
<b>SEEPAG</b>	Southeast European Prosecutors Advisory Group
<b>SIENA</b>	Secure Information Exchange Network Application
<b>SOP</b>	Standard operating procedure
<b>STR</b>	Suspicious transaction report
<b>UNCAC</b>	United Nations Convention Against Corruption
<b>UNODC</b>	United Nations Office on Drugs and Crime
<b>UNTOC</b>	United Nations Convention Against Transnational Organised Crime

## Executive summary

1. The globalisation of financial systems, combined with rapid technological advancements, has facilitated the evolution of financial crime into a highly transnational, swift, and complex phenomenon. This transformation has had a significant impact on operational frameworks and has presented challenges for the detection, investigation, and prosecution of financial crime, including money laundering (ML). These challenges include a growing demand from competent authorities for timely, high-quality, and diverse types of information; the need to engage collectively with an increasingly broad and varied range of domestic and foreign counterparts; differences in legal frameworks and disparities in the powers and access available to competent authorities across jurisdictions; and, fundamentally, the need to foster trust and reciprocity among authorities in charge of ML enforcement.
2. To assess the evolving ML landscape, its challenges, and how competent authorities have adapted the ways in which they pursue international co-operation, the project team—co-led by representatives from the Egmont Group (through the FIUs of Australia and the Netherlands), INTERPOL, and UNODC—collected input from members of the FATF Global Network and the Egmont Group. In total, 106 jurisdictions responded to two questionnaires circulated in September and October 2024, with further insights shared by expert practitioners during a dedicated session at the Joint Experts Meeting in January 2025. These contributions formed the foundation for the development of a handbook that identifies key challenges to international co-operation in ML detection, investigation, and prosecution, and highlights practical tools and best practices to address them.
3. Given the cross-border, rapid, and complex nature of modern ML, it is essential to leverage both informal and formal co-operation mechanisms in synergy. Successful outcomes depend on strategically and effectively combining various informal channels and ensuring the cohesive, complementary use of both informal and formal co-operation mechanisms as needed. The handbook places particular emphasis on the critical role of informal co-operation. Informal channels provide faster, more flexible, and targeted communication, complementing formal mechanisms—typically grounded in mutual legal assistance treaties and other legal instruments—which are often slower and procedurally complex.
4. The handbook outlines four distinct types of informal co-operation, each with its own advantages and limitations. Its purpose is not to favour one approach over another, but to provide competent authorities with a range of options. This enables practitioners to select the most appropriate form of co-operation according to the specific needs, objectives, and scope of each case. For example, multi-lateral networks support information and intelligence exchange across numerous jurisdictions through established frameworks, clear governance, designated contact points, standardised protocols, and secure communication channels. Bilateral co-operation is valued for its agility and the trust it fosters. Diagonal co-operation—between different types of competent authorities—combines powers and expertise and enables better synchronisation between non-counterparts but can present challenges, often leading jurisdictions to favour co-operation between counterparts. Joint analysis and investigations leverage complementary strengths, integrate diverse information sources to generate deeper insights, improve co-ordination, and enable more targeted focus, notwithstanding significant legal and operational complexities.

5. Likewise, the project team aimed to identify the types of criminally-associated information that competent authorities may seek through international co-operation—often disbursed across multiple jurisdictions and increasingly held by entities outside the traditional AML/CFT sectors—as well as the authorities that typically hold such information. Given the wide array of multi-lateral networks enabling informal co-operation and information exchange, each with distinct purposes, governance structures, and operational models, the team additionally mapped those most frequently used for ML detection, investigation, and prosecution.

6. The second part of the handbook examines best practices, tools, and mechanisms to support practitioners in strengthening international co-operation for ML enforcement. It outlines overarching best practices relevant across all phases (from detection to investigation and prosecution) beginning with the importance of high-quality information exchange supported by a solid understanding of counterparts, and well-targeted and prioritised requests. Practical measures such as the establishment of contact points, standard operating procedures, information matrices, multi-phased responses, and feedback loops can also significantly improve communication. Where agreed upon by practitioners and balanced with flexibility, standardisation through templates or protocols enhances co-operation, consistency, and reliability. Adherence to governance principles—such as confidentiality, procedural rules, secure communication, and prior consent for dissemination—is essential to fostering trust and reciprocity.

7. The handbook especially emphasizes the importance of formalised domestic co-ordination mechanisms, supported by appropriate legal frameworks and adequate technical and human resources, as a cornerstone of effective international co-operation. Effective domestic co-ordination is critical for successful diagonal co-operation.

8. The final sections of the handbook delve deeper into the specific phases within the ML enforcement chain, outlining best practices and mechanisms that competent authorities can leverage to advance their operations. This includes the use of multi-lateral networks, digital tools to automate data exchange and analysis while maintaining privacy safeguards, and diagonal co-operation. Informal communication channels can also complement formal co-operation in securing court-admissible evidence and in locating individuals for arrest, extradition, witness testimony, or service of legal notices.

9. Finally, while joint analysis and investigation are emerging as potentially valuable tools for enhancing international co-operation, they are not yet widely pursued or considered conventional forms of co-operation by many delegations. The handbook encourages countries to explore these approaches further, recognising the challenges involved in establishing such mechanisms. Best practices are highlighted, with examples from both structured multi-lateral networks and successful initiatives outside them. Regardless of the setting, successful joint analysis and investigations require mutual benefit, a common understanding of roles, and a shared commitment to contribute actively. Trust is crucial in all forms of co-operation but particularly vital in joint analysis and investigations, where sensitive information is exchanged. The handbook outlines trust-building strategies, including collective risk assessments, joint training sessions, and regular inter-jurisdictional meetings to share experience.

10. This handbook is intended to be used at the jurisdictional level to help competent authorities leverage the full range of international co-operation tools. It is complemented with three operational brochures tailored towards overcoming the

practical challenges faced by financial intelligence units, law enforcement authorities, and central authorities responsible for mutual legal assistance, including prosecutors. These brochures contextualise the handbook's key findings and best practices from each authority's perspective, offering targeted guidance and encouraging jurisdictions—within legal limits and with flexibility—to refine their tools, optimise their capabilities, and explore innovative approaches.

11. The findings presented in this handbook should also be useful to other workstreams in the FATF, within national governments, and for other stakeholders, for example in relation to the implementation of the FATF Standards on co-operation.



## 1. Introduction

### 1.1. Objectives and structure

12. The globalisation of financial systems and developments in technology have created inter-connected networks that enable funds to move rapidly and internationally. Financial crimes are increasingly transnational, necessitating information sharing and operational co-operation (domestic and international) for effective response. While different countries look to piece together a comprehensive response against criminal operations, financial information and intelligence is decentralised across multiple jurisdictions, posing challenges for financial crime enforcement, including detection, investigation, and prosecution. The rising complexity in crime has also resulted in a growth of information needs by competent authorities, both in terms of volume and speed.

13. An international threat requires an international response. The Egmont Group, FATF, INTERPOL, and UNODC have jointly collaborated to develop this handbook to identify and mitigate the operational challenges to international co-operation faced by competent authorities to ultimately enable high quality complex ML investigations and prosecutions, one of the least effective areas of global AML/CFT regimes. The handbook is structured into two parts:

- **Part I** provides competent authorities with a common understanding of the operating landscape on international co-operation for ML detection, investigation, and prosecution. This includes exploring operational challenges and evolving needs, as well as highlighting channels for effective co-operation.
- **Part II** identifies best practices, tools, and mechanisms that jurisdictions may consider adopting to achieve successful transnational ML detection, investigation, and prosecutions. This includes leveraging multi-lateral networks, as well as joint and diagonal co-operation to achieve high quality enforcement outcomes.

14. The handbook is complemented in the Annex by three operational brochures addressing the practical challenges faced by three specific sets of actors of the AML-community—financial intelligence units (FIUs), law-enforcement authorities (LEAs), and prosecutors—when it comes to co-operating internationally.

### 1.2. Focus and scope

15. The handbook is primarily developed for FIUs, LEAs, prosecutors, and other operational competent authorities in charge of ML detection, investigation, and prosecution, in line with the responsibilities set forth under FATF Recommendation 30.

16. Holistically, this handbook relies on the foundations laid by the FATF Standards, including Recommendations 29, 30, 31, 37, 39, and 40. Ultimately, this handbook aims to assist relevant competent authorities to achieve the following outcomes:

- Effectively detect, investigate, and prosecute ML activity; and
- Seek mutual legal assistance and extradition.



17. To achieve the above outcomes, **this handbook focuses on how competent authorities can leverage the various forms of international co-operation** outlined under Recommendation 40, specifically in relation to co-operation between FIUs, between LEAs, and between non-counterparts. These other forms of international co-operation (also termed as “informal co-operation”) generally refer to exchanges not relying on international instruments as well as mutual legal assistance as specified in Recommendations 36 to 39.

18. This handbook draws on the lessons learnt in FATF’s previous works, including the typologies reports on ML and transnational illicit financial flows linked to various crimes<sup>1</sup>, and builds upon key best practices from the FATF reports on Recovering International Proceeds of Crime through Inter-Agency Networks as well as Operational Issues—Financial Investigations Guidance.

### 1.3. Methodology

19. Experts from FIU Australia and FIU The Netherlands (on behalf of the Egmont Group) as well as INTERPOL and UNODC co-led this project<sup>2</sup>.

20. The findings and best practices within this handbook are based on:

- A request to the FATF’s Global Network and the Egmont Group of over 200 jurisdictions and 177 FIUs respectively, to obtain information on international co-operation and co-ordination mechanisms and strategies from across a spectrum of competent authorities, including FIUs, LEAs, and prosecutors. In total, the project team received inputs from over 106 delegations.
- A review of existing literature and open-source material on this topic. This includes existing research and insights done by international organisations and technical assistance providers, including the work of INTERPOL and UNODC.
- Discussions and insights shared at the FATF’s Joint Experts Meeting (January 2025) on operational challenges and solutions.

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<sup>1</sup> For example, see various reports on [Illicit Financial Flows from Cyber-enabled Fraud](#), [Countering Ransomware Financing](#), [Money Laundering and Illegal Wildlife Trade](#), [Money Laundering from Environmental Crime](#).

<sup>2</sup> In addition, the following jurisdictions and organisations from the FATF Global Network contributed to the work as part of the project team: Anguilla, Australia, Bahrain, Benin, Burundi, Canada, Cayman Islands, China, Dominican Republic, the Eurasian Group (EAG), El Salvador, the European Commission, Europol, Gambia, Greece, Guinea, Guinea-Bissau, Iceland, India, Indonesia, Italy, Jamaica, Korea, Luxembourg, Malawi, Mauritius, Mexico, the Netherlands, Nigeria, Singapore, Spain, Switzerland, Togo, Türkiye, the United States, the United Arab Emirates, and Zimbabwe.

Part I: Understanding the operational landscape

21. Part I of the handbook provides competent authorities with a common understanding of the operating landscape for informal international co-operation. As there are myriads forms of such international co-operation, this Part provides some structure on how informal co-operation can occur.
22. The goal is to provide practitioners with a complete picture of the various mechanisms and networks they can leverage in the course of their work, how these mechanisms can be inter-related, the main benefits and challenges that they may face in using them, and how a changing criminal landscape may impact operational mechanisms.

2. Setting the scene

2.1. Relationship between informal and formal co-operation and their goals

23. International co-operation can typically be divided into two categories: “formal” and “informal”<sup>3</sup>. Informal and formal co-operation are not competing mechanisms and are each driven by different purposes. This consequently results in different requirements and processes that govern these exchanges. Exchanges via both types of co-operation are shaped by international standards and instruments (such as conventions) but are ultimately governed by a jurisdiction’s legislative frameworks, i.e., to ensure all exchanges and co-operation are legal and legitimate.

Table 1. Different goals between informal and formal international co-operation

	Informal co-operation	Formal co-operation
Purpose	<ul style="list-style-type: none"><li>Obtain and verify intelligence and information to support further analysis and investigation.</li><li>Support the creation of more precise and complete formal international co-operation requests.</li><li>Use of non-coercive investigative measures, e.g., exchanging information available without the taking of coercive measures under national law.</li></ul>	<ul style="list-style-type: none"><li>Coercive investigation measures, including obtaining evidence and information accessible only through coercive powers and formal procedures (e.g., banking information).</li><li>Assistance to execute extradition and confiscation orders.</li></ul>
Contact process	<ul style="list-style-type: none"><li>Direct: FIU, law enforcement, prosecutor or investigating magistrate (where allowed) directly to respective counterpart.</li></ul>	<ul style="list-style-type: none"><li>Both direct and indirect. Direct transmission of requests between central authorities and use of diplomatic channels through the Ministries of Foreign Affairs, as well as through other ministries.</li></ul>
Requirements	<ul style="list-style-type: none"><li>Generally, less onerous and can begin once contact has been established between counterparts.</li></ul>	<ul style="list-style-type: none"><li>May be more onerous, with various legal requirements and thresholds to be met and set out before exchanges can happen, including to ensure admissibility of obtained evidence in court.</li></ul>

<sup>3</sup> See [FATF Assessment Methodology \(2022\)](#); Note 5 to Assessors for Immediate Outcome 2.

24. Successful ML enforcement outcomes may require combining both informal and formal international co-operation. The best results are achieved when they are used in a cohesive, complementary, and well-sequenced manner. Authorities can engage in informal co-operation at any phase to conduct cross-border detection, investigation, and prosecution of ML activities. This is usually done before, or in parallel to, formal co-operation. Informal co-operation can be used to obtain critical intelligence and information to advance analysis and investigations. This can serve as a basis to determine if an MLA request is necessary, as well as refine and expedite the MLA request and the overall process to obtain formal co-operation. This is especially so as the foreign jurisdiction would often require knowledge of the predicate offence in the requesting jurisdiction, in order to assess the MLA request. Informal co-operation offers a framework to discuss the extent and amount of information to be shared on the underlying predicate offence, which could facilitate the foreign central authority's assessment on the MLA request.

25. A common theme across both informal and formal channels of co-operation is the importance of reciprocity. In some cases, reciprocity may be a consideration on how jurisdictions prioritise incoming requests, or the level of flexibility they will afford to their counterparts.

### What is reciprocity?

In a general sense, the principle of reciprocity refers to the mutual exchange of benefits or concessions between jurisdictions or organisations, without the formal binding mechanisms of treaties or agreements. It is based on the idea that parties involved act co-operatively with the expectation that similar actions will be reciprocated in the future. In informal international co-operation, reciprocity ensures a balance of give-and-take in the relationship, fostering trust and mutual benefit. It relies on goodwill, shared interests, and the expectation of continued interaction.

Key features of reciprocity in informal co-operation may include:

- Voluntary exchange: No legally binding obligations, but actions are undertaken with the expectation of mutual benefit.
- Trust building: Strengthens relationships by creating a cycle of co-operation based on mutual respect.
- Flexibility: Informal arrangements allow for adaptive and context-specific exchanges.
- Long-term engagement: The expectation of future interactions encourages parties to act fairly and uphold commitments.

As such, reciprocity can be considered as the cornerstone of informal co-operation.

In a more specific sense, referenced to the *Egmont Group Principles of Information Exchange between FIUs*—binding on member FIUs by virtue of their voluntary membership in the Group—reciprocity

refers to the capacity and practice of FIUs engaged in international co-operation to obtain or access, and share similar information or financial intelligence. An FIU is expected to share with its foreign counterparts the maximum amount of financial intelligence or information that it can obtain or access according to the laws of the disclosing FIU's jurisdiction. An FIU can refuse co-operation, as appropriate, for example, on the grounds of lack of reciprocity or recurring inadequate co-operation.

## 2.2. Overarching characteristics of informal co-operation

26. Informal co-operation enables competent authorities in charge of ML detection, investigation, and prosecution to obtain and disclose intelligence and information related to threats; assist their analytical and investigative activities; and implement urgent provisional measures where legally authorised.

27. Overall, informal international co-operation is underpinned by the following common characteristics:

- **Speed:** Informal co-operation is inherently quicker than formal co-operation, with the latter being encumbered by bureaucratic formalities in communication exchanges. Competent authorities value informal co-operation channels for their ability to cater for faster exchanges, particularly in time-critical cases. This helps competent authorities to sharpen their focus and scope of their inquiry or investigation and identify actionable paths forward.
- **Agility:** The reduced “red tape” enables agility through informal co-operation, making it easier to obtain specific information without (as many of) the restrictions of formal processes. In addition, informal co-operation can accommodate various means of communication (phone, e-mail, in-person, etc.), allowing for new information and developments to be communicated quickly. Requests can be supplemented with more information and adapted as cases develop and evolve. Counterparts can be more willing to react based on changing circumstances, are cognisant of what types of information will be more relevant for these circumstances, and therefore can contribute to higher quality inputs to build transnational cases. An example of the increased agility and reduced procedural burden afforded by informal co-operation is the spontaneous disclosure of information—an approach explicitly encouraged under both the United Nations Convention against Transnational Organized Crime (UNTOC) and the United Nations Convention against Corruption (UNCAC) —see box below.
- **Flexibility:** Informal co-operation allows jurisdictions and competent authorities to be flexible, by identifying the appropriate channels based on their needs for assistance. This flexibility further extends to the types of assistance that can be provided, with varying levels of request complexity ranging from simple verification of data to deeper joint analysis and investigations. Competent authorities can also combine the use of different types of informal co-operation mechanisms (e.g., through both multi-lateral and bilateral channels) to reach the most effective outcome. In addition,

informal co-operation allows competent authorities to directly communicate their needs with each other, allowing them to resolve and identify common ways forward by focusing on substance over form (e.g., resolving differences in dual criminality or differences in legal systems).

- **Focus:** Another benefit of informal co-operation is that practitioners better understand the capabilities, requirements, and limitations of their partners, and may be able to focus their own enquiries in a mutually beneficial/complimentary and more efficient way. This could positively impact to future operations where the same practitioners are connected through an informal network. The stability of partnerships could even improve risk understanding and detection.
- **Trust:** Informal co-operation is underpinned by trust. Trust is often built from previous positive co-operation and/or is the result of a common membership to the same network with established contact points and rules/guidelines governing how information should be exchanged and used. Ultimately, trust drives and motivates competent authorities to be fast, agile, and flexible in their exchanges via informal co-operation, as they believe that any information and intelligence exchanged will not be used in bad faith.

### Spontaneous disclosures as an illustration of the informal co-operation's agility

Spontaneous disclosures of information play a critical and proactive role in informal international co-operation for AML, especially in the detection, investigation, and prosecution of money laundering and related offences. Their importance lies in their timeliness, flexibility, and ability to trigger cross-border actions without the procedural delays often associated with formal MLA.

Paragraphs 4 and 5 of Article 18 of the UNTOC and Article 46 of the UNCAC establish a legal basis for the spontaneous transmission of information in an early phase. These provisions allow a State Party to voluntarily share information related to criminal offences covered by the Conventions with another State Party—even in the absence of a formal request and where the receiving State may be entirely unaware of the information's existence. The primary objective of these provisions is to promote the proactive and voluntary exchange of information in criminal matters among States Parties. Upon receiving such information, the recipient State may choose to initiate a formal request for MLA based on the details provided. The receiving State is generally required to maintain the confidentiality of the transmitted information and to respect any conditions attached to its use, consistent with the obligations that apply when information is shared through formal assistance channels. However, an important exception applies where the information is exculpatory in nature—in such cases, the receiving State is permitted to disclose the information freely within its domestic legal proceedings.

## 2.3. Main types and levels of informal co-operation

28. There are four main types of informal co-operation that competent authorities can engage for assistance: Multi-lateral; Bilateral; Diagonal; and Joint analysis and investigations. While this section aims to provide deeper understanding on the respective types of informal co-operation, it is important to note that these types of co-operation can co-exist and, in many cases, reinforce each other to achieve better outcomes.

### *Multi-lateral co-operation networks*

29. Multi-lateral co-operation networks (multi-lateral networks) generally refer to an established platform that facilitates information and intelligence exchanges amongst counterparts across numerous jurisdictions. These exchanges are mostly done on a regional or global level, and are established under specific partnership agreements signed among multiple jurisdictions, or as part of jurisdictions' membership in the different regional/international organisations (such as

INTERPOL, Egmont Group of Financial Intelligence Units, Europol, Eurojust, the EU Anti-Money Laundering Authority etc.)<sup>4</sup>.

30. Multi-lateral networks enable competent authorities of a jurisdiction to communicate and co-ordinate with a wide array of foreign counterparts who take part in the network. Such networks facilitate real-time and direct communication between counterparts, which accelerates the sharing and synchronisation of critical intelligence and information. Such timeliness is essential for effective ML detection, investigation, and rapid response to threats.

31. Multi-lateral channels offer several additional benefits:

- ***Established framework and governance rules:*** Multi-lateral networks are guided by their own internal principles, rules, and/or procedures, established in agreed constituting or understanding documentation. They govern how information can be exchanged, whom the information can be shared with, and subject to what conditions the exchanged information may be used. Such established frameworks provide the basis and common understanding for information sharing, and align the expectations of participating authorities. The use of these channels requires compliance with their respective governance rules/ principles from their members to ensure mutual accountability and confidentiality. These governance rules establish legal safeguards on how information shared are to be used, thereby strengthening the trust between authorities when it comes to information sharing.
- ***Clear contact points:*** In major multi-lateral networks, specific individuals or agencies are appointed as the point of contact for the network. Jurisdictions can leverage these multi-lateral networks to identify the right counterpart in the foreign jurisdiction for information exchange and target it when the investigation team has clear indications that it will get useful information from the receiving jurisdiction. It also makes it possible for competent authorities of different jurisdictions to establish a relationship of trust and to share best practices easily to facilitate better collaboration. For example, INTERPOL's 196 member countries each runs a National Central Bureau (NCB), and all NCBs are connected via the INTERPOL I-24/7 secure global communications network.
- ***Standardised protocols and practices:*** Multi-lateral networks provide additional guidance on how information exchanges can be transmitted effectively and rapidly. This includes standardised protocols that can make co-operation more predictable and streamlined. For example, the Egmont Group of FIUs adheres to common guidelines and standards that can facilitate a more coherent and reliable exchange of information.
- ***Secure communications:*** Several multi-lateral co-operation networks have developed their own platform for secure information exchange. The most commonly used across jurisdictions are: INTERPOL's I-24/7 global secure communications network; Egmont Secure Web (ESW); and Europol's Secure Information Exchange Network Application (SIENA). The use of these platforms allows for encrypted and secure communication and ensures the information requested or obtained is made available through an authorised and trusted source. Regional examples include the FIU.net, the CLEO

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<sup>4</sup> See also Section 4.2. on Primary multi-lateral networks and users.



(collaboration, learning, enhancement, operations) secure information sharing platform the FIUs of Southeast Asia and Australia have developed, as well as a secure information exchange system for the Commonwealth of Independent States (CIS) Member States.

### ***Bilateral co-operation***

32. Bilateral co-operation refers to exchanges between counterparts in two jurisdictions. A primary hallmark of bilateral co-operation is deeper trust. Mutual trust is continually built between bilateral counterparts through successful exchanges and collaboration. This deeper trust facilitates counterparts to be flexible and agile in their responses between each other and helps foster greater understanding on the limitations of their respective legal and operational frameworks. This extends to future operations where the same practitioners are connected through a multi-lateral network.

33. Bilateral exchanges are built upon trust and reciprocity, and driven through a range of mechanisms, including, where required by the local legislation, establishing Memoranda of Understanding (MoUs), and general law enforcement co-operation agreements. Some jurisdictions have also appointed liaison officers/attachés stationed overseas, as well as secondees in partner jurisdictions, which enable them to better contextualise the differences in laws and processes on information sharing, thereby facilitating more effective and efficient information exchange.

### **The role of liaison officers deployed abroad**

Liaison officers serve as a direct point of contact with law enforcement and governmental authorities in the host jurisdiction, working to establish professional relationships and foster mutual trust and confidence between the agencies of both jurisdictions. Their role is to officially represent their agency on foreign territory, but they are also used as informal facilitators of requests from and to their home countries. Liaison officers act as the “human interface” among national police forces, ensuring the effective exchange and management of information between agencies.

Although they possess no law enforcement powers in the host jurisdiction, liaison officers leverage their networks to gather intelligence that may support the prevention, detection, investigation, and prosecution of cross-border offences. They can also use their contacts to advise the law enforcement and prosecutorial authorities of the host jurisdiction, as well as their own corresponding authorities, on how to formulate a formal request for assistance.

Once such requests are made, liaison officers play a key role in following up to ensure they are addressed effectively and in a timely manner—an especially valuable function when navigating differing legal systems.

Given the significant costs associated with deploying liaison officers abroad, such postings are typically reserved for jurisdictions with which the sending jurisdiction already maintains substantial co-operation. To optimise resources, liaison officers may be accredited to

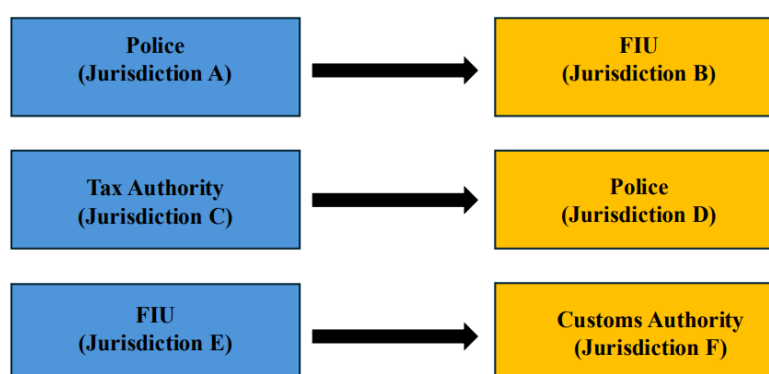
cover not only the host jurisdiction but also neighbouring countries in the region. In some cases, a single liaison officer may represent multiple sending jurisdictions under a shared agreement.

### *Diagonal co-operation*

34. Diagonal co-operation<sup>5</sup> refers to the process of collaboration between competent authorities of different types (e.g., police, customs and tax authorities, FIUs, prosecutors etc.) in different jurisdictions. Diagonal co-operation can occur directly or indirectly.

- **Direct:** This refers to a requested information passing from a receiving competent authority directly to a non-counterpart foreign requesting authority. Such direct exchanges avoid delays that might arise from traditional, siloed methods of information exchange within jurisdictions. The information exchanged directly between the two agencies is provided expeditiously without the need of a “middleman”, with exchange and communication mechanisms agreed beforehand. The rationale behind direct diagonal co-operation is never to bypass the direct counterpart but to make them aware of the request being made, rather than passing them the burden of requesting/passing information through (e.g. Police A sends a direct request to Tax Authority B, while keeping Tax Authority A in copy of the request). However, direct diagonal co-operation raises number of challenges, that may include: difficulties in identifying the appropriate non-counterpart in another jurisdiction; a lack of secure communication platforms; limitations and/or divergences in legal and operational frameworks; strict rules of confidentiality and access; and disparities in exchange processes, tools, and data formats compared to counterpart co-operation. Additional concerns may arise around trust, governance, and safeguards, particularly when the two non-counterpart entities are engaging for the first time. These factors often contribute to jurisdictions favouring indirect channels for exchanges between non-counterparts.

#### **Infographic 1. Illustration of direct diagonal co-operation**

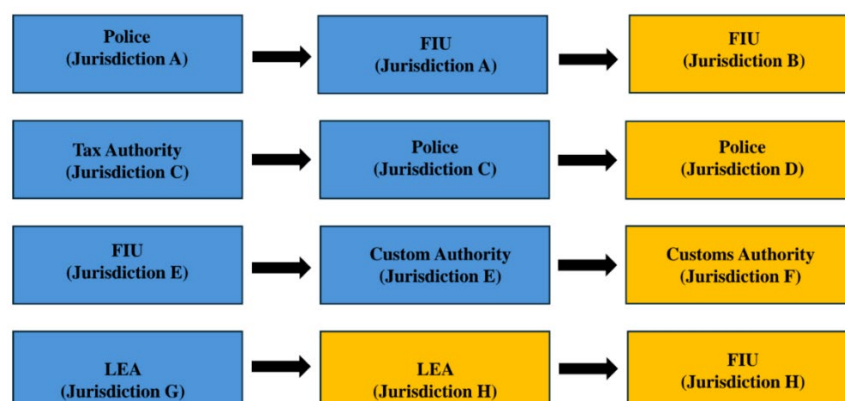


Note: The above is for illustrative purposes and does not capture the full range of possibilities of diagonal co-operation.

<sup>5</sup> See also Section 6.3. Supporting diagonal co-operation.

- **Indirect:** This refers to requested information passing from the receiving competent authority through one or more domestic or foreign authorities before being received by the foreign requesting authority (e.g., Police A to FIU A to FIU B). Through indirect diagonal co-operation, competent authorities can leverage existing trust and mechanisms built between their direct counterparts to facilitate indirect co-operation with foreign non-counterparts, particularly in cases of unfamiliar collaboration.

### Infographic 2. Illustration of indirect diagonal co-operation



Note: The above is for illustrative purposes and does not capture the full range of possibilities of diagonal co-operation.

35. Diagonal co-operation widens the availability of information as it allows competent authorities to tap on other pools of intelligence and information that may not traditionally be accessible to them. Ultimately, this improves agility and flexibility amongst competent authorities across the various jurisdictions. Other benefits associated with diagonal co-operation include:

- **Combining powers and expertise:** Beyond widening information available, diagonal co-operation allows competent authorities to combine powers to create more effective analysis and investigations. This can particularly be useful in instances where powers of and access to information between direct counterparts are often unequal. In addition, diagonal co-operation can allow competent authorities to tap into specialised insights and expertise from non-direct counterparts, particularly in instances relating to niche crime types, assets, or laundering techniques.
- **Actionable and targeted:** Diagonal co-operation can further bring analysis, investigations, and prosecutions to a high level. From an FIU-LEA perspective, diagonal co-operation can produce complementary analysis that would help generate more robust and actionable leads for law enforcement. This reduces the burden on receiving jurisdictions by making it easier to understand the information on a specific lead, rather than receiving it independently from multiple sources. From a law enforcement and prosecutorial perspective, diagonal co-operation can put LEAs, prosecutors, and judges in direct contact, allowing deeper synchronisation on what is required from an investigative and evidentiary perspective in their respective jurisdictions.

### *Joint analysis and investigations*

36. In the context of this report, joint analysis refers to co-operation taking place within an intelligence-sharing framework, typically by FIUs and/or LEAs to detect ML targets and methodologies. In the same manner, joint investigations are often carried out by LEAs and possibly prosecutors performing criminal investigations. Both joint analysis and joint investigations require a collaborative effort by competent authorities to work together for a dedicated period of time on specific investigations or cases, as it entails in-depth and active participation by all involved parties in analysing data and drawing joint conclusions.

37. Such joint collaboration, happening at a regional or global level, takes multi-lateral exchanges to a higher level. While general multi-lateral sharing may involve sharing data without further analysis, joint work entails a deeper level of collaboration—where agencies and their counterparts engage in co-ordinated analysis and investigation of specific operational targets. This approach enables participants to exploit potential synergies, integrate diverse sources of information, and extract progressively richer insights. In doing so, they can collectively advance their mutual interests and obtain a full picture of the criminal activities at hand.

38. The foundations for such collaborative approaches vary according to the legal systems of the participating jurisdictions. They may include: agency-to-agency MoUs; dedicated frameworks provided by multi-lateral co-operation networks, and flexible co-operation arrangements built on established co-operative practices, which may also be facilitated by liaison officer networks. These are generally considered forms of informal co-operation. However, joint analysis and investigations may require formal legal agreements between competent authorities of two or more States for the purpose of carrying out criminal investigations, MLA legislation, and treaties.

39. Especially when collaboration in the form of joint analysis and investigations is a recent phenomenon, some teething challenges may still arise, including practical ones such as: differences in language; working methods; legal frameworks and diverse capacities to obtain information; resource limitations and unbalanced workloads between jurisdictions; lack of alignment of priorities and operational schedules; and difficulties when it comes to identifying and selecting cross-border cases that merit joint analysis or investigation. Data security concerns are also a challenge against such communications as joint analysis and investigations entail the sharing of sensitive data across multiple partners.

40. Nonetheless, when the capacity and operational and legal framework exist, joint analysis and investigations have been growing in numbers due to the myriad of benefits in participation:

- ***Integrated approach:*** Competent authorities combine their intelligence and information on a case to holistically identify trends, transactions, and networks. This allows participating jurisdictions to directly obtain an enhanced understanding of the others' financial environments, while also leading to identification of sophisticated patterns, relationships, financial assets, and entities that may otherwise be overlooked. This can help mitigate potential challenges related to the complex and multi-faceted issues that single agency approaches often cannot effectively resolve. For example, joint investigations may identify new leads into other professional enablers and networks that may require further investigation.

- **Direct communication:** Joint analysis and investigations allow for direct, real-time communication and assistance. Direct communication facilitates quick resolution of issues, as well as the sharing of information and intelligence across different jurisdictions. Regular in-person meetings ease the communication between counterparts working in several jurisdictions and make it easier for jurisdictions to clarify things with each other. The collaborative environment fosters a culture of mutual support and trust, which is crucial in high-stakes law enforcement operations, while ensuring that all participants are aligned in their goals. Ultimately, this also sets the foundation for competent authorities to be agile and adapt to changing requirements.
- **Pooling of expertise and resources:** Joint collaboration allows resources (financial, IT, human etc.) and expertise across various jurisdictions to be efficiently pooled and allocated, improving the depth and accuracy of case analysis and investigations, leading to strong case outcomes. This co-operative approach allows agencies to leverage each other's strengths, such as advanced technological capabilities or specialised investigative techniques, which might be limited within a single jurisdiction. Such collaboration also fosters the integration of diverse expertise, bringing unique perspectives and skills to the table.
- **Co-ordination and targeted focus:** Competent authorities co-ordinate and align their methodologies, allowing all participants to work towards aligned and mutually beneficial outcomes. Joint analysis and investigations are inherently case-specific and directly linked to active leads relating to investigations or law enforcement needs. Information is exchanged directly with the people and organisations involved in the operation. Decisions are made faster as authorities meet regularly and understand the background of the case, so there is no need for an evaluation for every request. Having a harmonised approach also extends to creating common practices and templates for information exchange, which greatly accelerates collaboration.

### 3. Evolution and challenges

#### 3.1. Changes in the criminal environment

41. In 2024, INTERPOL's strategic analysis identified ML as the second highest global crime threat faced by member countries, just behind drug trafficking. Crime is also becoming increasingly complex and transnational. For example, Europol's 2024 report *Decoding the EU's most threatening criminal networks* found that 68% of the organised crime groups (OCGs) it has investigated are composed of members of multiple nationalities and that 76% of the most threatening criminal networks are present or active in two to seven countries.

42. Complex and transnational criminality is primarily driven by the rapid digitalisation of services, which consequently resulted in a significant increase of cases globally and a greater sophistication of the modus operandi, especially in cyber-enabled financial and economic crimes. For instance, criminals have been observed leveraging Artificial Intelligence (AI) and Machine Learning to develop new ML schemes or refine traditional methods.

43. Digitalisation has also enabled a growing criminal connectivity that manifests in three main areas:

1. **Communications:** Criminals leverage technology to operate from anywhere in the world. Criminal networks are becoming more de-centralised with network members potentially operating in an unlimited number of countries. The modern world has provided criminals with very convenient communication tools, including anonymity enhancing technology and encrypted communications platforms to co-ordinate operations instantaneously while evading detection. This includes the ability to obtain and use international phone numbers, websites, digital services, as well as even more advanced techniques such as the use of the dark web and cryptocurrencies.

This results in criminally-associated information to be disbursed across multiple jurisdictions, that may also be held in non-traditional AML/CFT sectors (e.g., E-Commerce, Telecoms). This also makes it more challenging to obtain relevant information given that some entities are 'headquartered' or operate from different jurisdictions.

2. **New financial developments, including VAs:** Funds transfers and payments are increasingly instantaneous and can happen in the matter of minutes and seconds. This results in criminals being able to move vast sums of monies across ML networks rapidly. The introduction and development of VAs have materially impacted laundering techniques, and this sector continues to grow in importance and is inherently cross-border in nature. The use of VAs for criminal purposes and the laundering of illicit proceeds has increased significantly in both scale and sophistication in recent years. VAs have been integrated into ML schemes and are increasingly linked to a range of predicate offences. They are also commonly used in the commission of standalone crimes, serving as a means of payment for illegal goods and services, both online and offline.

New entrants to the financial markets (including digital payment service providers) as well as the rapid development of new financial products (e.g.,



virtual IBANs) further complicate the work of competent authorities when it comes to detecting, investigating, and prosecuting illicit funds transfers.

3. **Easy access to financial systems:** OCGs are directly accessing multiple digital services that facilitate the establishment of new companies, including the digital opening of bank accounts on multiple jurisdictions. Growing digital onboarding processes provide criminals with the ability to open accounts, including through money mules, via different financial institutions (FIs), e-money and payment institutions, registered in different jurisdictions. An individual may have a company in one country, reside in another, and hold a bank account with a credit institution in a third country. This direct access may further result in the disappearance of the traditional middleman/intermediaries, allowing criminals to directly and remotely transact and move funds rapidly.

### 3.2. Increasing challenges in the informal co-operation environment

44. As interconnectivity grows deeper, the ability of criminal groups to spread out and create distance between them, their operations and their assets grow further. Pragmatically, this means that competent authorities are increasingly faced with the reality of having to collaborate on a multi-lateral level to gain a complete picture of the entire criminal network. They also have to collaborate at a more granular level to obtain data and intelligence that may be embedded and hidden through complex structures or financial products, and as well as with non-traditional counterparts that may not be familiar to them.

45. The changes in the criminal environment have also exacerbated some of the perennial challenges competent authorities face when seeking out informal co-operation.

#### *Speed of response*

46. The shift to digital financial crime has necessitated increasingly closer and faster co-operation and data sharing between foreign competent authorities. Financial flows are becoming faster than ever, making it necessary for authorities to act swiftly to intercept or preserve illicit funds. The volatility of digital evidence also necessitates authorities to act fast to secure the required information. However, while the flow of funds and information can happen within seconds or minutes (speed of transaction), the exchange of information between jurisdictions can take days, weeks, or months (speed of law). There can also be different expectations on what is “timely”, which may change based on the nature of the crime as well. Multi-lateral and regional information sharing platforms provide one answer for enabling faster information exchange and operational co-operation.

47. Criminals also exploit this time delay by intentionally structuring themselves across multiple jurisdictions. This signals a growing need for competent authorities to exchange information on a multi-lateral level (amongst multiple countries). However, this can impact the ability to exchange information as differences in legal frameworks and standards compound when more and more countries are involved. Authorities may face various challenges in the mismatch of access to information, differences in vocabulary and language, reciprocity, trust, data protection etc., as they look to co-operate multi-laterally. Jurisdictions highlighted leveraging multi-lateral relationships to develop and build deeper bilateral co-operation. Authorities also



found importance in having a variety of informal networks to allow them the highest level of flexibility to co-operate in the best manner possible.

### ***Volume of exchanges***

48. As case volume surges, competent authorities also find themselves having to exchange an increasing amount of cross-border data to effectively detect and investigate crime in their own jurisdiction. Relevant data can be disbursed across multiple entities, and authorities may need specialised knowledge and tools to analyse the data effectively. In addition, criminal activity conducted across the Internet can result in new sources of information, such as electronic forensic data (IP address, device ID etc.), that needs to be analysed to piece together a comprehensive financial profile of a criminal organisation.

49. The increased volume in data and cases disbursed across multiple jurisdictions can create challenges, forcing jurisdictions to prioritise and identify cases of most value to them. Resource constraints and limited capacity (e.g., lack of manpower dealing with cross-border ML requests, or lack of skillsets in financial investigations involving digital assets) can pose a challenge for authorities receiving requests to process and respond to them promptly. There may also be differences in prioritisation between the country where the predicate crime has occurred and the country where the ML was conducted. Multi-lateral and regional forums (such as the Financial Intelligence Consultative Group in Southeast Asia, the Pacific Financial Intelligence Community in the Pacific groupings of FIUs, or the Council of the Heads of FIUs of CIS Member States) provide an avenue for members to share priorities and agree on the protocols and mechanisms on how to escalate operational matters.

### ***Quality of requests and information***

50. While faster collaboration is preferable, this cannot come at the expense of quality, which is vital in ensuring that the information that is exchanged is actionable. Proactive intelligence and information sharing by foreign counterparts is one of the key factors for successful cross-border ML detection and investigation. Yet, one common challenge faced relates to how information shared by foreign counterparts can lack sufficient actionable details or is absent of a clear nexus between the predicate crime and the alleged ML allegations. There were other instances where information and intelligence were shared directly with counterparts without additional analysis or value-add. While legitimate reasons may explain this (e.g., prioritising speed of reply over detailed analysis; broad requests; resource constraints; etc.), it can impede the operational value and quality of exchanges. Lastly, there can be challenges in exchanging information on standalone ML in the absence of a predicate offence, which could further impede cross-border ML, especially in most cases where the criminal proceeds would be laundered across multiple jurisdictions.

51. With data needs growing, competent authorities are faced with challenges in disparate information sharing, where requests and exchanges are not always streamlined (e.g., lack of templates/specific forms, etc.). This can delay and impact the quality of requests received. The relevance of the requests/information may not be clearly stated upfront in requests, which requires recipient countries to spend extensive time to analyse voluminous documents and information before determining if the request was actionable. Language barriers can also exacerbate and impact the quality of requests and responses. On the other hand, the lack of feedback

mechanisms on referrals and responses can leave authorities uncertain on whether the information they have exchanged was useful.

### ***Difficulties in identifying counterparts***

52. Criminals can exploit regulatory arbitrage opportunities, identifying gaps and vulnerabilities in uneven implementation of AML/CFT Standards. Cases that involve multiple jurisdictions have become frequent and increasingly significant, also due to the cross-border financial flows and operations of increasingly transnational OCGs.

53. Competent authorities may face challenges if they conduct inquiries and investigations in isolation, as they would be unable to fully exploit potential synergies and common data maintained by their foreign counterparts. However, it can be difficult for authorities to identify the correct counterpart to request for information, especially if there has been no prior engagement or established contact between the two competent authorities in the jurisdictions.

54. Interestingly, these challenges appear to be mitigated for FIUs as there is only one per jurisdiction, making it easy for them to identify their counterparts. On the other hand, LEAs can be myriad, with different agencies with varying authority and competencies to investigate various predicate types as well as complexity. Notwithstanding whether it is easy to identify direct counterparts, there is now a need to work collectively with different domestic and foreign agencies, particularly as data and cases begin to cut horizontally across different sectors (both traditional and new).

### ***Access to resources and information***

55. As volume and complexity increases, competent authorities may face growing pressures and challenges to ensure they are resourced appropriately to handle this wave. This includes human resourcing, as well as appropriate tools to handle and process increased case, request, and data volume.

56. Another significant challenge is the uneven access and powers of competent authorities to collect information. Different competent authorities have different levels of access to information. This happens domestically where FIU could be restricted in obtaining certain type of information while LEAs or prosecutors get access to it, and vice-versa. Internationally, given the diversity of legislative frameworks, FIUs, LEAs, prosecutors, and other AML/CFT competent authorities do not always have the same access and powers as their foreign counterparts. For example, some FIUs are not able to obtain financial information from obliged entities without MLA or without a prior STR having been received on the same case. The conditions limit their response only to available data from their databases while at the same time other FIUs do not restrict their replies to requests only to their internal databases but also collect and provide significant volume of information such as bank statements, assets held, and used IP addresses. This uneven access to information between competent authorities at home and between foreign counterparts can only be compensated by a solid domestic co-ordination framework that facilitates access to the available information, and a good understanding by the competent authorities of a jurisdiction of their international partners' capabilities, powers, and access.

### 3.3. Impact on informal international co-operation approaches

57. Traditionally, competent authorities may automatically seek international assistance whenever there are leads (e.g., through an STR) that reveal a transnational element. However, the changes in the criminal landscape and exacerbated challenges have transformed how competent authorities may seek informal co-operation. Competent authorities may now need to adapt co-operation methods accordingly.

58. Faced with the increased volume and complexity of cases, competent authorities are observed to take on a more targeted approach when making international requests for information (i.e., identifying when and what information to request). Such targeted approach looks to mitigate the resourcing challenges faced, while seeking to maximise the effectiveness of co-operation exchanges. To ensure the targeted approach remains focused and relevant, competent authorities rely on a range of factors, including the likelihood of obtaining meaningful exchanges from partners, as well as their strategic goals, priorities, and access of data sources/powers.

59. In addition, as financial crime techniques continue to evolve, competent authorities face the need to anticipate new typologies in order to remain ready for any emerging threats and challenges. There is now an observed shift from a traditionally “reactive” approach in international exchanges, to a more “proactive” collaboration in terms of strategic patterns and trends to ensure a holistic response. As discussed above, this has resulted in a shift in deeper relationships between FIUs, LEAs as well as other traditional and non-traditional AML/CFT competent authorities<sup>6</sup>.

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<sup>6</sup> Please also refer to Part II of the handbook for more details on best practices, tools, and mechanisms.

## 4. Informational needs and primary multi-lateral networks

### 4.1. Informational needs

60. Under the FATF Standards, it is important that FIUs have access to the widest possible range of financial, administrative and law enforcement information. This should include information from open or public sources, as well as relevant information collected and/or maintained by, or on behalf of, other authorities and, where appropriate, commercially held data. Similarly, countries should ensure that LEAs and investigative authorities have timely access to a wide range of information for use in their investigations. Generally, competent authorities require information to establish two key areas: (i) full details of the criminal conduct, and (ii) persons involved, their identity and location.

61. The types of information that competent authorities rely on to further financial analysis and investigations into ML activity can be broken down into five different categories, as per the box below.

#### Types of information relevant to ML detection, investigation and prosecution

**Criminal information:** This refers to judiciary and law enforcement information related to the subject and/or criminal activity. It includes criminal records providing information such as previous arrests, indictments, and convictions as well as intelligence on the criminal activities of a subject gathered from surveillance, informants, interviews/interrogation and data research, or may be just picked up “on the street” by individual police officers.

**AML/CFT Disclosures:** In addition to suspicious transaction reports (STRs), this includes other information as required by national legislation such as cash transaction reports, wire transfer reports, and other threshold-based declarations or disclosures.

**Financial Information:** This refers to information about the financial affairs of entities of interest that helps to understand their nature, resources, structure and capabilities, and it also helps predict future activity and locate assets. This goes beyond the information contained in AML/CFT disclosures and is normally maintained by private third parties. This includes bank accounts, financial accounts, other records of personal or business financial transactions, information collected in the context of meeting customer due diligence (CDD) obligations, as well as other types of information such as information on beneficial owners, information held in commercial or business registers, information on property and assets (movable and immovable).

**Open source:** Information that are available through open sources such as the Internet, social media, print and electronic media, as well as via registries operated publicly or privately.

**Regulatory information:** Information that is maintained by regulatory agencies; access is typically restricted to official use only. This category of information could be held by central banks, tax authorities, other revenue collecting agencies, etc.

Note: This list is illustrative and is not meant to be exhaustive.

Source: FATF (2012) [Operational Issues—Financial Investigations Guidance](#)

62. In addition to the types of information above, the changing criminal environment has now resulted in the relevance of a new type of information for ML activity: digital information. Digital information can include IP addresses, email addresses, device ID, addresses of virtual assets' wallets, as well as usernames, monikers, and nicknames. Such information may be held by a wide range of private third parties both traditional and non-traditional, including banks (e.g., IP address linked to account use), social media and communications platforms (for information linked to criminal communications), email service providers, VASPs, cloud storage and software providers. Understanding the functions of these entities, and how their services may be exploited by criminals, is critical for securing timely access to criminal information and evidence. However, competent authorities continue to face significant challenges in co-operating with digital service providers located abroad, particularly in cross-border investigations. These difficulties are compounded by the need to navigate differing legal frameworks and jurisdictional requirements, which may conflict or diverge in their approach to data access and privacy protections.

63. The table below further contextualises the governmental agency/competent authority that typically holds custody of the above types of information.

**Table 2. Custodians of information**

Types of information	Custodians of information
Criminal information	Judiciary, LEAs
AML/CFT Disclosures	FIUs
Financial Information	FIUs, Supervisors, Beneficial Ownership registers, Bank Account registers
Open source	All
Regulatory information	Supervisors, LEAs
Digital information	Judiciary, LEAs

## 4.2. Primary multi-lateral networks and users

64. There is a myriad of multi-lateral networks available for competent authorities to co-operate informally and exchange information. Given its different purposes and goals, these networks can vary in terms of governance and structure. The box below lists some of the networks commonly used by the different competent authorities for ML detection, investigation, and prosecution.

### Examples of common operational multi-lateral networks

#### For FIUs

- **The Egmont Group of Financial Intelligence Units** is a united body of 177 FIUs covering most jurisdictions in the world and enabling operational co-operation on AML/CFT between countries. The Egmont Group provides FIUs with a secure platform (Egmont Secure Web) to exchange financial intelligence and expertise to combat ML, terrorist financing, and associated predicate offenses. The Egmont Group adds value to member FIUs' work by improving stakeholders' understanding of ML/TF risks and draws upon operational experience to inform policy considerations, including AML/CFT implementation and AML/CFT reforms. The Egmont Group does not conduct financial investigations. Instead, domestic law enforcement and investigative authorities manage such inquiries.
- **FIU.net** is a decentralised computer network that connects all EU FIUs, to exchange and pseudonymously cross-match<sup>7</sup> financial information reported to them as well as the results of their analysis, in a timely way and, in line with data protection requirements. Each FIU stores its own information in its own local FIU.net database and can share that information with other FIUs directly through their local FIU.net application server. Hence, there is no single database in the FIU.net system, but instead the database remains stored at each FIU and the application shares traffic between the node (connections). The system remains primarily a channel for the exchange of information between FIUs, but its new framework provides possibilities to connect third parties (which could hypothetically be prosecutors or LEAs), and the European Public Prosecutor's Office. Europol is already an end-user of the network.

#### For LEAs

- **INTERPOL** is the world's global police organisation. Its I-24/7 secure communications network connects law enforcement officers across its 196 member countries, enabling authorised users to exchange sensitive and urgent police information with their counterparts across the globe. INTERPOL also offers a range of specialised capabilities to its member countries, including operational and analytical support; access to its 19 databases (containing records on known international criminals, fraudulent travel and identity documents, stolen administrative documents, etc.); case co-

<sup>7</sup> Pseudonymous cross-matching refers to the process of comparing and linking financial data from different sources while protecting the identities of the individuals or entities involved.

ordination; and international alerts through its ‘Notices’ system. Each member country hosts an INTERPOL National Central Bureau (NCB), which acts as a country’s focal point for all INTERPOL activities and connects their law enforcement with other countries and with the INTERPOL General Secretariat. In 2022, INTERPOL also established its Financial Crime and Anti-Corruption Centre to provide dedicated expertise to support its member countries in tackling illicit financial flows.

- **Europol** supports EU Member States in preventing and combating all forms of serious international and organised crime, cybercrime, and terrorism, including ML. As the EU’s central information hub on crime, Europol provides agile operational support and European policing solutions in co-operation with a broad network of partners. To maximise co-operation, it has established agreements with 38 countries across four continents and 18 international and European organisations, enabling varying degrees of collaboration. Europol facilitates swift, secure, and user-friendly exchanges of operational and strategic crime-related information through the Secure Information Exchange Network Application (SIENA)—a state-of-the-art platform serving the communication needs of EU law enforcement. In support of ongoing operations, Europol deploys analysts and specialists, establishes Operational Task Forces (OTFs)—temporary teams of Member State, third-country, and Europol experts focused on high-value criminal targets—and participates in joint investigation teams (JITs) with competent authorities. It also co-ordinates Joint Action Days, intelligence-led operations initiated by Member States to target criminal networks across the EU.
- The **Anti-Money Laundering Operational Network (AMON)** is an informal global network created to connect and facilitate the interaction and exchange of expertise among practitioners working in the field of combating ML. Its members include representatives of police/law enforcement national authorities across approximately 50 jurisdictions, who are experienced in investigating ML. Its main goals are to enhance operational co-operation, establish a well-developed network of professionals, serve as a centre of excellence in the field of AML, and act as an advisory group to appropriate authorities. Investigators can access the network through their AMON national contact point, benefiting from information exchange, knowledge sharing, and best practices in combating ML. The AMON Permanent Secretariat is hosted by Europol.



### For Prosecutors

- **Eurojust**, the EU Agency for Criminal Justice Co-operation, serves as a hub of legal expertise enhancing judicial co-ordination between national investigating and prosecuting authorities across the EU and third states in combating serious cross-border crime, including ML, TF, and asset recovery. Eurojust facilitates the execution of judicial co-operation requests and decisions, including those based on mutual recognition instruments, by supporting direct contact and exchange of information between issuing and executing authorities, and convening meetings to clarify legal requirements. Eurojust can co-ordinate parallel investigations, host co-ordination meetings involving judicial and law enforcement authorities, and establish or fund JITs to promote collaborative transnational criminal investigations under a formal legal framework. Headquartered in The Hague, Eurojust hosts formal networks such as the European Judicial Network, the JITs Network Secretariat, and the European Judicial Organised Crime Network, along with focus groups like the Judicial Focus Group on ML and Asset Recovery. The agency also has a robust strategy for co-operation with international partners, hosting 12 Liaison Prosecutors from non-EU countries, with co-operation agreements in place with 13 non-EU countries and over 70 global contact points. In recent years, Eurojust has also forged connections with judicial networks and associations in other regions. In 2024, economic crimes—including ML—were the leading crime types addressed by the agency<sup>8</sup>.
- The **Ibero-American Network for International Legal Co-operation (IberRed)** consists of central authorities and contact points from Ministries of Justice, Prosecutor's Offices, Judicial Branches, and similar institutions in the 22 Ibero-American Community of Nations countries, as well as the Supreme Court of Puerto Rico. Its main goal is to optimise civil and criminal judicial assistance instruments and strengthen collaboration through formal and informal co-operation among central authorities and contact points. These authorities work in six areas: extradition, MLA, child abduction, transfer of convicted persons, and the UN Conventions against Transnational Organised Crime and Corruption. They use the Iber@ Platform, an electronic platform providing exclusive, secure, and confidential access for contact points, liaisons, and international legal co-operation networks such as Eurojust and INTERPOL. This platform facilitates rapid and reliable exchanges of formal and informal requests for co-operation.

**Other**

- **The UNODC Global Programme on Criminal Network Disruption (CRIMJUST):** Led in partnership with INTERPOL, CRIMJUST aims to support countries located along supply chains of trafficked commodities, through a comprehensive integrated approach, to go beyond the mere seizure of illicit commodities and undertake prosecution designed to disrupt the activities of criminal networks involved in drug trafficking, ML, and corruption. CRIMJUST interventions are tailored to the needs of participating countries, ranging from a focus on promoting co-operation and information exchange between FIUs, law enforcement, and prosecutors to spurring pre- and post-seizure interregional investigations and supporting case preparation and case progression. Such interventions concentrate on supporting authorities through all phases of a case, that is from intelligence collection to analysis, the production of actionable intelligence, the mapping of organised criminal groups and detection of emerging trends, the provision of a secure platform for real-time data exchange (CRIMJUST Intelligence Network), the facilitation of joint investigations between jurisdictions, case co-ordination, the prosecution of high-level targets and proceeds of crime-related actions in line with human rights standards.

Note: This is an illustrative list and is not meant to be exhaustive. There are various other international and regional bodies that facilitate information exchange and informal co-operation. Multi-lateral networks that can be leveraged for asset recovery purposes will be addressed in the upcoming FATF *Guidance on Asset Recovery*.

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<sup>8</sup>. For a presentation of Eurojust's key findings on ML, see also: [www.eurojust.europa.eu/publication/eurojust-report-money-laundering](http://www.eurojust.europa.eu/publication/eurojust-report-money-laundering).

## Part II: Best practices, tools, and mechanisms

65. Part II identifies best practices, tools, and mechanisms that jurisdictions and competent authorities may adopt to achieve successful transnational enforcement results. This includes how to leverage multi-lateral networks, as well as joint and diagonal co-operation to achieve high quality enforcement outcomes.

66. The process of tackling financial crimes involves varying degrees of legal thresholds at different phases, reflecting the increasing rigor required as cases progress. For example:

- In the detection phase, FIUs primarily deal with identifying suspicious transactions or activities that indicate potential financial crimes. This phase relies on the exploitation of STRs data, information contained in the different databases that FIUs have access to, financial information gathered from obliged entities, feedback from LEAs, often by making use of sophisticated IT tools in carrying out their analysis and with a focus on providing quality leads on possible illicit activities, without being required to identify with certainty the existence of an offence. LEAs, for their part, play a key role in the detection process by proactively initiating parallel financial investigations alongside ongoing investigations into predicate offences. LEAs can also probe into ML activities and networks by leveraging information gathered from other sources, such as human intelligence.
- During the investigation phase, LEAs obtain and build upon more concrete evidence to establish a reasonable suspicion linking the suspicious activity to a potential crime. This level is sufficient to justify coercive investigative actions, such as applying for subpoenas to interrogate suspects, or to prevent the dissipation of illicit assets.
- Finally, in the prosecution phase, the standard of proof rises significantly to beyond a reasonable doubt, especially in criminal proceedings. In this phase, prosecutors must present compelling evidence of the charge, ensuring that justice is served while respecting the presumption of innocence.

These progressive thresholds ensure a balanced approach to financial crime enforcement, protecting individuals' rights while enabling effective action.

67. This Part first aims to identify overarching best practices that can apply universally when seeking informal international co-operation. The later chapters look to delve deeper into tangible best practices and solutions to overcome challenges faced across the ML enforcement spectrum, as jurisdictions look to progress deeper from detection, investigation, to finally prosecution.

## 5. Overarching best practices

### 5.1. Good quality of requests and exchanges

68. The success of informal international co-operation depends primarily on the quality of the information exchanged by the partners. Such quality can be impacted by the quality of requests sent. For requests to be actionable, they must be targeted and include clear specifications on what is needed and why. This means that each request should generally:

- i. Include a clear objective of the request, including the types of assistance being sought.
- ii. Clearly state and describe the facts of the criminal offence being investigated, with a clear description of the link of the investigation to the receiving jurisdiction (i.e., criminal nexus). Such description may include: detailed references to transactions conducted within the receiving jurisdiction; suspected predicate offence; the period under investigation; identifiers relating to the persons of interest.

69. Requesting authorities that do not include such actionable information run the risk of their requests being perceived as “fishing expeditions”, resulting in the rejection of requests, a de-prioritisation of their requests, or a low-quality response. Ultimately, this erodes mutual trust.

#### Best practices for targeted and high-quality requests and exchanges

##### **Know your partners with the Egmont Group Biennial Census:**

The Egmont Biennial Census (EBC) is a comprehensive survey conducted every two years by the Egmont Group of Financial Intelligence Units. Its primary purpose is to gather detailed information on the operational capabilities, legal frameworks, and modalities of member FIUs. This data collection enhances mutual understanding among members and supports effective international co-operation and information exchange. The EBC’s findings are typically summarised in the Egmont Group’s annual reports, providing transparency and fostering a shared understanding of the evolving landscape of FIUs worldwide. As the capacity regarding access to data and enforcement powers (e.g., monitoring, suspension, asset freezing) may vary greatly from one FIU to another, the EBC should be considered as a valuable tool for FIUs to tailor their requests to foreign counterparts, ensuring a good quality of exchanges from the start. Similar source of information at the local EU level is the European Judicial Network.

**The use of SOPs and guidelines in Singapore on outgoing requests to foreign counterparts:** Singapore implemented standard operating procedures (SOPs) and guidelines on the management of outgoing investigation and asset recovery requests to foreign counterparts, which covers elements of international co-operation relating to ML detection, investigation, and prosecution, in

addition to asset recovery. These SOPs and guidelines provide key principles to guide investigation officers when seeking assistance from foreign counterparts. They highlight the importance of setting out the purpose of the request, providing adequate information on the request, and ensuring that the request is within reasonable parameters that would enable foreign counterparts to assist. This practice makes it easier for foreign counterparts to read the request, as it is standardised. In this way, it is quicker to target the information to be exchanged and to know who to contact to do so, thus saving time. As a result, a more focused and higher-quality inquiry creates fertile ground for informal co-operation and greater communication between foreign counterparts.

**GAFILAT Rrag’s Open Source Inventory and Matrix of Information:** The Open Source Inventory developed by the GAFILAT Asset Recovery Network (RRAG) lists all the types of information that is publicly available to competent authorities in the RRAG member jurisdictions, without having to request it from foreign competent authorities through co-operation channels. The sources include records of designated non-financial business and professions (DNFBPs), beneficial ownership, non-profit organisations (NPOs), public procurement, company registries, among others. It enables competent authorities to access relevant public information in a timely and more efficient manner, while avoiding unnecessary requests to foreign authorities. This inventory is complemented with a Matrix of Information which maps the types of data available through international co-operation requests and help competent authorities elaborate targeted and actionable requests. Contrary to the Open Source Inventory, this matrix is not public and is only accessible by raising a request through the RRAG platform.

## 5.2. Continuous communication

70. Continuous communication is vital during co-operation to ensure that both the requirements of requesting and receiving authorities are being satisfied. Such continuous communication is key to the agility and flexibility of informal co-operation.

71. Where information may be scant (e.g., due to early phases of inquiry), requesting authorities should be upfront in indicating so, with assurances to follow up with additional information and clarifications when available. Likewise, when answering a request, the receiving authorities can share in advance the type of information easily and quickly available, in the form of a first partial or preliminary response, before submitting a more comprehensive response.

72. Feedback from the requesting authority (for instance through a follow-up email, a feedback form, or a survey) is also relevant. Authorities should also aim to ensure there are feedback mechanisms to inform the receiving authorities whether the information they have exchanged was useful. Feedback can be targeted to a single request, or to different request types (e.g., based on typologies). This builds a trusted relationship for future co-operation.

**Best practice: FIUs' and LEAs' two-phase response**

A best practice for the receiving FIU or LEA is to follow a structured approach when responding to international requests for information from foreign counterparts, prioritising efficiency and timeliness. As part of their preliminary response, receiving authorities first supply results derived from internal databases and other directly accessible sources. These internal checks may include transaction records, suspicious activity reports, open-source data, and other financial intelligence that can be retrieved rapidly. This initial response allows the requesting authority to conduct a preliminary assessment and, if necessary, refine its request for additional details.

Following this first phase, receiving authorities proceed with more complex information gathering, which may involve requesting data from external sources such as LEAs, financial institutions, and regulatory bodies. This second phase typically requires more time due to legal, procedural, or operational constraints. By adopting this tiered response approach, receiving authorities ensure that critical information is shared as quickly as possible while complying with domestic and international legal frameworks. This method enhances the efficiency of cross-border financial intelligence exchange, supporting the timely detection and disruption of illicit financial activities.

**5.3. Standardisation and templates**

73. The standardisation of protocols and practices often helps making co-operation structured, facilitates a more coherent and reliable exchange of information, and the increased efficiency it bolsters may even help making up for lack of human resources.

74. From a content perspective, standardisation helps harmonise data formats and terminologies used. Competent authorities may use different descriptors and terminologies in their various domestic contexts, which may create misunderstandings when assessing whether requests are actionable. These misunderstandings are compounded when faced with greater volume of requests and data needs, coupled with language barriers and time pressures. Using agreed upon definitions, terms and terminologies helps reduce ambiguities and raise request quality, especially in the context of bilateral exchanges or joint analysis and investigations (e.g., referring to the specific crime type by a common terminology).

75. From a process perspective, many countries have developed standardised templates that take into consideration the relevant due processes they need to accelerate acting on requests. Standardised requests also enable both requesting and receiving authorities to focus immediately on the key areas that needs consideration—e.g., specific transaction movements or individuals—greatly facilitating the data analysis process. Standardisation also assists in accelerated data

triage and analysis, particularly when it is designed with connectivity into local databases in mind.<sup>9</sup>

76. However, as the rigidity of templates may impede the agility of international co-operation, standardisation must also be balanced with a search for flexibility. Not to mention the difficulty to align terms and mutual understanding of formats and terminologies between agencies, the more formalised a process, the higher the risk that additional authorisations will be required and that competent authorities will be tempted to share less information because of the “officialness” of the channel. This is why, standardisation and templates must always be agreed upon by the actual practitioners completing and responding to the requests.

### **Best practice: The use of standardised forms and guidelines in Argentina, India, and the United Kingdom**

**Argentina:** FIU Argentina has developed an electronic form (accessible via a secure and restricted portal reserved for authorised users) to be completed by judicial authorities (judges and prosecutors) who request the FIU’s collaboration in submitting requests for information to their foreign counterparts. The form comprises the following information: i) the purpose(s) for which the information will be used, in particular, whether it will be used for intelligence purposes or be incorporated as evidence into court proceedings; ii) a brief description of the events triggering the request; iii) data that make it possible to identify the persons or property involved that are relevant for the purposes of the request; iv) the alleged link with the jurisdiction of the receiving body. Filling in fields instead of drafting a request ensures not only that the request is complete with the appropriate information, but also that requests are better structured and justified. As a result, delegations report that they receive more valuable inputs from their counterpart FIU, as it makes it possible to target missing information: identification data, link with the jurisdiction, description of the case under investigation, etc. Bringing structure to informal co-operation through the use of forms also enables faster responses.

**India:** The Ministry of Home Affairs (MHA), India’s central authority for international co-operation on criminal matters has launched an online MLA portal, to ensure that requests are handled efficiently and uniformly. Additionally, the MHA has established a set of standardised guidelines for international co-operation, issued under the Criminal Procedure Code and the Prevention of Money Laundering Act (PMLA). These guidelines provide a clear and structured framework for managing incoming and outgoing MLA requests, marking a significant step toward standardising India’s international co-operation efforts. The portal provides an online template for making the requests to various countries and ensures standardisation and quality of the requests by making it

<sup>9</sup> See also Section 8.2. Creating common terms of reference for joint analysis and investigations.



clear and concise. By establishing a predictable and legally compliant process, the online MLA portal has enhanced India's capacity to work with foreign nations, reducing delays and miscommunication, while ensuring timely and effective responses to requests for legal assistance.

**United Kingdom:** The UK Central Authority (UKCA) co-ordinates MLA requests in England, Wales and Northern Ireland relating to criminal matters, except for tax and fiscal customs criminal matters which are co-ordinated by HM Revenue & Customs (HMRC). The UKCA has developed an Online Submission Form, which provides a secure means of transmitting MLA and Extradition requests. Using the online service reduces the risk of delays. It provides for instant transmission of requests and prompts users to supply information necessary to execute the request. The online service assists the UKCA in providing timely and effective responses to requests for mutual legal assistance. In addition, the UK has produced detailed MLA guidelines, for authorities outside of the UK who wish to make an MLA request to the UK. The guidelines are intended to ensure that requests for MLA received by the UK contain sufficient relevant information so that they can be acceded to and executed quickly and efficiently. They provide guidance to authorities who wish to make a formal request for MLA to the UK and also provide guidance to authorities on what information or assistance can be obtained in the UK without having to make a formal MLA request. In addition, the UK has a standard form for all requests for MLA and asset freezing and confiscation for use with EU Member States and for all other states the UK publishes templates for letters of requests for MLA.

#### 5.4. Adherence to governance principles, rules, and confidentiality

77. Governance principles and rules, e.g., in multi-lateral networks or in MoUs, as well as data security and confidentiality, are key ingredients for successful informal co-operation. The adherence to these principles helps promote trust between partners and increases accountability between members. These all directly encourage counterparts' willingness to be open and flexible during assistance.

##### **Best practice: How FIU's operational independence and autonomy fosters trust**

The operational independence and autonomy of an FIU are fundamental to ensuring its effectiveness in combating financial crimes, ML, and terrorist financing. An FIU must have the authority to analyse, request, and disseminate financial intelligence without undue influence from external parties, including political bodies, LEAs, or private sector stakeholders. This independence safeguards the integrity of the FIU's work, enabling it to make impartial decisions based on financial intelligence, the operational needs of competent authorities or the risks to which their country is exposed,

rather than external pressures or conflicts of interest. By maintaining control over its internal policies, analytical processes, and decision-making, an FIU can effectively identify suspicious financial activities and share relevant intelligence with domestic and international partners.

Autonomy also plays a crucial role in fostering trust, both among domestic stakeholders and within the global network of FIUs and their partners. When an FIU operates without interference, reporting entities are more likely to share accurate and timely information, knowing that their disclosures will be handled professionally and confidentially. Similarly, international counterparts are more inclined to engage in information exchange, confident that the FIU is operating under strong governance and legal protections. In turn, this trust enhances collaboration, strengthens financial intelligence networks, and ultimately improves the global fight against financial crime.

An example in that direction is related to the suspension of transaction/s based on a foreign counterpart request. It is likely that only operationally independent and autonomous FIU will be able to conduct such suspension effectively and without data leaks that could result in funds dissipation.

78. Breaches of confidentiality ruin trust and endanger the whole AML/CFT international co-operation system. They can have severe legal, reputational, and diplomatic consequences, and may entail the international liability of a jurisdiction. Therefore, competent authorities should ensure that there are clear domestic operational rules governing the confidentiality of handling exchanged information. This also includes seeking permission from the source authority before sharing the information with third parties. Authorities should further ensure that confidentiality agreements are understood to avoid the misuse or leaks of foreign-provided information.

### Best practices to ensure data integrity and confidentiality

**Prior consent for dissemination in the context of FIU-to-FIU information exchange:** Prior consent for dissemination refers to the explicit approval required from the originating FIU before the recipient FIU can disclose to a third party the shared information or use it for purposes other than those originally approved by the originating FIU. This mechanism ensures that sensitive financial intelligence data is handled in accordance with confidentiality agreements and legal frameworks governing its use. The requirement of prior consent safeguards the integrity of the information, prevents unauthorised disclosures, and maintains trust between FIUs. It allows the originating FIU to evaluate the risks associated with the proposed use, including the potential impact on ongoing investigations or the security of the information, before

granting permission. The prior consent for dissemination is also a time-saving procedure that enable to accelerate the information exchange besides securing it.

**Europol's SIENA handling codes:** Europol receives information from competent authorities in the Member States or Third Countries (e.g. law enforcement, Customs, FIUs, AROs, prosecutors) with an agreement allowing the exchange of operational information. This information relates to very sensitive areas such as terrorism, organised crime, cyber, or financial crime. The contributing countries maintain the ownership of the information, and they can decide on the way this information is used. To allow this, the contributing authorities apply a code in the messages they exchange in the Secure Information Exchange Network Application (SIENA), that set limits to the use of the information. With this handling code, an authority indicates what the receiver can do with the information and whether it can be used or not in a judicial case, preventing further dissemination or setting deadlines for the storage of the message in the databases. Handling codes set common criteria in the use of information and help increase trust among authorities, as the contributors keep control over the information provided.

## 5.5. Domestic co-ordination, capacity, and resources

79. Successful international co-operation requires good domestic co-ordination, capacity and resources. In each jurisdiction, there are several competent authorities that play different roles in the AML system, and they differ in the power they hold and in the access to information—for instance, customs may hold significant data that may be of interest in understanding trade-based money-laundering or cash smuggling, the central bank may hold information relevant to police in identifying unlicensed activity, while the tax authority may hold beneficial ownership information. If a competent authority does not have sufficient access to information at the domestic level or does not have the powers or basis to use the platforms to exchange information, it may be difficult for it to answer international requests or to contribute to a joint analysis or investigation, hence (i) the necessity for jurisdictions to have formalised domestic co-ordination mechanisms to facilitate co-operation, informal and formal, between authorities, and (ii) the necessity for the various domestic agencies involved in combating ML to understand each other's mandates and responsibilities.

80. Possible mechanisms that foster a robust domestic co-ordination between competent authorities for international co-operation include:

- **Specialised domestic units** for information exchange with foreign competent authorities: Created for the specific purpose of exchanging with foreign partner, whether as a sole or shared mandate. Countries may create multiple of these units—for example one in each district, or spread throughout the country in key locations—or they may rely on one unit for the entire territory.

- **Information sharing systems** whereby all relevant authorities would be aware of previous or on-going analysis/investigation made on the same persons and/or legal entities.
- **Single points of contact** in charge of international co-operation within the competent authorities.
- **Policies and procedures**—formalised through written agreements such as MoUs— that promote the sharing of information between competent authorities and establish process whereby disputes are resolved.

#### Best practice: Structured communications between the FIU and LEAs in the Netherlands

In line with the FATF recommendations, and together with law enforcement, FIU Netherlands is working on a structured way of labelling in the LEA's systems when STRs are used by LEAs. This provides direct feedback on the relevance and useability of FIU products/output. The Dutch FIU uses this input to review the quality of hand-over, its processes, and priorities. In addition, the insights provide input for the FIU-LEA conversations on risks and the follow up on these risks. Altogether, this strengthens the domestic collaboration and quality of work between FIU and LEAs and ultimately fosters indirect diagonal co-operation between the Netherlands and foreign jurisdictions.

- **Domestic task forces on specific analysis project or investigation:** The task force model incorporates personnel from different competent authorities who share a common goal, bringing together different expertise and tools or legal powers. Task forces may be permanent or temporary, topic-specific or general, local or national, and case-related or not. Their key feature is drawing on varied skill sets and having a multi-agency nature.

#### Best practice: Domestic and international co-operation between competent authorities to investigate a massive Covid-related tax fraud in Italy

In 2021 and 2022, the FIU Italy (UIF), through operational analysis supported by information exchanges with foreign FIUs and with the assistance of law enforcement and Italy's Tax Revenue Agency, uncovered a multi-billion-euro fraud and cross-border ML scheme. This scheme involved the creation of fictitious tax credits linked to legitimate measures introduced by the Italian government during the COVID-19 pandemic. In light of the strategic role played by the Italian Tax Revenue Agency and Finance Police in the management of tax credits and in assessing their authenticity, fruitful and effective co-operation was conducted by the UIF through meetings and workshops with the aforementioned authorities, aiming at comprehensively understanding and addressing the underlying risk

and at enriching the analysis. On the international front, bilateral co-operation with EU FIUs was highly active, and the intelligence gathered played a crucial role in tracing the final destination of the financial flows. The Italian Supervisory Authority, the Anti-Mafia Investigation Department, and the National Anti-Mafia Directorate benefited from the analysis conducted within this collaborative framework, which led to multiple arrests and asset freezes abroad. Ultimately, the case resulted in reforms to tax legislation, strengthened controls and regulations, and the prevention of further fraudulent activities. It stands as a model of effective domestic and international co-operation among FIUs, obliged entities, and other authorities, including public institutions in which information exchanges were conducted through dedicated and secure platforms both internationally and domestically, as well as through meetings and workshops.

- **Network of liaison officers deployed abroad:** Besides facilitating contacts between the foreign authorities and their home ones and forming a bridge to databases in both jurisdictions, liaison officers deployed abroad are a way to foster the co-ordination of competent authorities back home. As they become focal points for various competent authorities in their country of origin, they play a unifying role in the co-ordination of all relevant domestic actors, especially at critical moments of an international financial investigation.

81. Furthermore, to be able to leverage all the international channels, specific infrastructures and sufficient resources must be dedicated to international co-operation domestically. There must be sufficient training to ensure that officers of competent authorities are aware of the available channels for assistance and how to use them. Identifying and knowing the appropriate network or channel to use depending on the case is important to maximise the benefits competent authorities can extract while mitigating any time wasted in seeking out assistance (e.g. knowing when to use the Egmont network to obtain AML/CFT disclosure information and financial data, or when to leverage police/INTERPOL networks to obtain police or criminal records). There should also be training to ensure competent authorities know how to convert and use the informally obtained intelligence and information into formal requests.

82. Competent authorities also require resources and capacity to deal with the overwhelming increase in data analytical needs. As a foundation, jurisdictions should ensure that there are adequate human resources to deal with the increased needs of international requests (both in terms of speed and volume), in line with their risk profile. As a best practice, many jurisdictions have also looked to invest in technological tools and products that can help accelerate and process information and data, which helps to accelerate responses to requests.

## 5.6. Timing

83. It is important to engage in informal co-operation as early as possible during the course of an inquiry or investigation. Requesting assistance early can streamline the process and save time by avoiding requests that are unlikely to yield results. For example, the need to embark on a lengthy MLA request process to obtain bank

account information can be avoided if there is information already received informally that the person of interest does not maintain a bank account there.

84. It can also be useful to set expectations and identify a timeline for response and an indication of the urgency of the request. Urgent requests should be justified and communicated clearly (for example, the Egmont Principles for Information Exchange between FIUs allow for prioritisation of urgent cases), so that receiving jurisdictions can quickly assess and prioritise them where appropriate. The deadline for response should be tailored to the quantity of the requested information, its source (external or internal to the receiving authority), the need for domestic co-ordination, and the need for application of provisional measures.

85. In certain cases, the urgency justifies the use of rapid response programs, such as those created by the Egmont Group and INTERPOL to trace criminal proceeds. The success of these rapid response programs relies in their clear scope and principles for co-operation: several of these networks or programmes are focused on specific crime types or modalities and include clear processes and document templates that are appropriate for those crime types. This facilitates the quick exchange of pre-agreed data fields in a clear, systematic and consistent manner (including the use of specific terms) and allows receiving jurisdictions to take prompt follow-up action.

#### **Best practice: The use of INTERPOL I-GRIP rapid response program to intercept illicit financial flows and trigger ML investigations**

The INTERPOL Global Rapid Intervention of Payments (I-GRIP) is a global stop-payment mechanism that enables member countries to share intelligence on the movement of criminal proceeds across borders, so allowing for swift action to intercept illicit financial flows before they are dissipated further. Since its launch, I-GRIP mechanism has supported many case successes.

In July 2024, NCB Singapore used the I-GRIP mechanism to request assistance from NCB Timor Leste following the transfer of USD 42.3 million to a fraudulent account linked to a business email compromise scam. As a result, FIU Timor Leste successfully intercepted USD 39.3 million overnight, and various national authorities initiated an ML investigation. This led to the arrest of 12 individuals suspected of fraud and ml; the seizure of an additional USD 2.6 million in cash; and the interception of USD 200 000 by FIU Indonesia.

INTERPOL further facilitated co-ordination among authorities in Singapore, Timor Leste, and Indonesia, enabling the recovery and return of the funds to the victim.

I-GRIP requests should include sufficient details upon which the receiving NCB can act, such as date of transaction, currency and amount, account numbers, and the names of the financial institutions associated with the beneficiary and remitter accounts.



## 6. Tools and mechanisms for detection and investigation

86. During the detection and investigation phase, competent authorities are primarily driven by the need to obtain information to assess and substantiate indications of criminal activity and to identify all individuals involved in the scheme. Authorities such as FIUs and LEAs often work with preliminary or incomplete information, seeking to evaluate its reliability and relevance. Despite the early phase of proceedings, LEAs begin securing evidence—such as documents, testimonies, records, or witness statements—that meet legal admissibility standards, while also gathering non-evidential information that may later develop into usable evidence but may not remain accessible. In this phase, informal co-operation mechanisms provide valuable tools to support the information needs and investigative objectives of competent authorities.

### 6.1. How to leverage existing multi-lateral networks

87. As mentioned earlier, many multi-lateral networks offer secure and encrypted platforms of communication. Examples include the Egmont Group's Secure Web system (ESW), EU's FIU.net, INTERPOL's I-24/7, and Europol's SIENA. The use of such platforms can be further governed by the networks' existing principles and rules, or by supranational legislations. Such controls can provide competent authorities with the reassurances of privacy and confidentiality needed to openly share and exchange data and information on offences and key persons of interest.

88. Participation in multi-lateral platforms can also function as a basis for competent authorities to develop deeper bilateral and multi-lateral (through participation in global and regional initiatives) connections. Counterparts can leverage the common framework and secure communication networks offered by multi-lateral platforms to establish secure bilateral co-operation on a case-by-case basis. Successful outcomes can thereafter pave the way for deeper future bilateral co-operation. Competent authorities may also work with foreign counterparts to find mutually feasible alternative ways to work around domestic operational restrictions to develop more actionable leads.

89. In addition, multi-lateral networks typically have clear singular points of contact per jurisdiction to reach out to that are directly connected to the networks. With crime becoming increasingly transnational, this directly solves and mitigates the challenge of identifying the relevant counterparts (or who exactly to speak to) in an unfamiliar jurisdiction (e.g., a domestic police agency may reach out to their INTERPOL NCB to find out more information on counterparts). As a value-add, many such networks also offer resources that promote international co-operation, such as templates to exchange information, a directory/census that provides information on powers and abilities of counterparts (e.g., the Egmont Biennial Census provides information on FIUs' capabilities<sup>10</sup>), as well as a forum to exchange views, trends, and insights.

### 6.2. Digital tools

90. Some multi-lateral networks have taken a step further in using technology to extract more benefits from standardisation and templates and mitigate co-operation

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<sup>10</sup> See Section 6.1. Good quality of requests and exchanges.



challenges. For example, the Egmont Secure Web platform facilitates translation of templates between foreign FIUs, which helps alleviate language barriers and allows FIUs to communicate and share progress of their requests.

91. Technology can also be used to automate data exchange and analysis once there is greater harmonisation and standardisation in datasets and requests. This includes using privacy-enhancing technology, such as pseudo-anonymisation, to automate cross-matching of information while maintaining privacy safeguards.

92. Beyond these examples, the advent of AI, while introducing international co-operation to new frontiers, holds significant potential to enhance the efficiency of international co-operation for ML detection, investigation, and prosecution.

### **Tool: The 'Next-Generation' FIU.net system**

FIU.net's match functionality allows an FIU to perform hit/no-hit searches against hashed datasets<sup>11</sup> from other FIUs. It is an autonomous, anonymous, analysis matching tool that automatically generates hits when it identifies links in the information held by FIUs. It enables FIUs to establish, in real time, if a subject is already known by another country, without the unnecessary exposure of data and allows the matching of data sources without the violation of privacy. The FIU.net 'Next Generation' was released on 3 February 2025. The new system introduces substantial enhancements in terms of strengthened flexibility, improved interoperability with FIUs' domestic IT systems, and a higher degree of IT and data security.

## **6.3. Supporting diagonal co-operation**

93. As discussed earlier, diagonal foreign exchanges can happen both directly and indirectly (e.g., through existing bilateral or multi-lateral networks). Regardless of how the exchanges occur, the value is in the combination of cross-functional data to enable and develop more actionable leads.

94. There are mechanisms and best practices that support this direction. Overall, regardless of the type of competent authority engaged in exchanges between non-counterparts, domestic co-ordination between competent authorities and international co-ordination between counterparts are crucial. FIUs, LEAs, or other competent authorities should inform their foreign counterpart if the same request is being made through other channels concurrently and provide relevant reference numbers where possible. This helps avoid circumvention and duplication and ensures better co-ordination among foreign agencies for comprehensive information gathering and exchange. Notwithstanding the benefits of diagonal co-operation, the

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<sup>11</sup> "Hashed datasets" refer to data processed through a cryptographic function to generate a unique, fixed-size output (a hash value) that cannot be easily reversed to reveal the original data. These datasets are used to protect the privacy of sensitive financial information. Rather than sharing raw data, FIUs exchange hashed values, which can be compared via the "hit/no-hit" search to identify matching records without exposing the underlying information.

sharing and transmission of information between non-counterparts should be done in a secure manner.

95. The *Egmont Group Operational Guidance* recommends that:

- Under an FIU's national law, the FIU retains discretion on whether or not to engage in diagonal co-operation.
- FIUs that decide to engage in diagonal co-operation should consider using the FIU-to-FIU channel to ensure maximum protection and integrity of the information exchange. When an FIU receives a request for information on behalf of a foreign non-counterpart, the response (which remains discretionary) should be sent to the counterpart FIU of the interested country to forward the information to the final recipient. When an FIU wishes to request information which is needed for analysis from a foreign non-counterpart, it should approach the FIU of the interested country explaining the case, seeking direction on which authority should be approached, and asking that the request be forwarded to that authority. The ESW or other recognised FIU-to-FIU channels should be used to exchange information.
- In cases where FIUs, based on domestic legislation, are required or empowered to follow a different pattern of international co-operation than the FIU-to-FIU channel, it is recommended that the FIU of the country where the non-FIU counterpart is located be informed about the request being filed or the information being provided.

### Best practices in supporting diagonal co-operation

**Bulgaria's use of FIU-to-FIU channels for indirect diagonal co-operation:** FIU Bulgaria sends requests to foreign FIUs on behalf of domestic LEAs. These requests are in support of pre-investigation, investigation or prosecution of cases of ML, associated predicate offences and TF, not necessarily linked to a case under analysis of the FIU. Of course, this does not mean that LEAs' requests are the only trigger for sending requests or that the FIU is "under instructions" from domestic LEAs. However, LEAs express the need to use the possibilities of FIU-to-FIU channels through diagonal co-operation to advance their investigations. The ultimate decision to send the request is of the FIU (including by verifying whether all requirements for sending a request pursuant to Egmont Group Principles are met). Such use of indirect diagonal co-operation supports ongoing investigations and thus prepares future MLAs by targeting them to areas where information is available and will be most useful for successful prosecution.

**Leveraging the deployed Police Attaché to support direct diagonal co-operation:** In early 2025, PPATK (FIU Indonesia), and the Fiscal Information and Investigation Service (FIOD), an LEA of the Netherlands carried on an intense direct diagonal co-operation to support a formal MLA request from the Netherlands to Indonesia in a scam crime case. The PPATK and FIOD exchanged information directly, the communications between the two entities being

supported by the Police Attaché of the Netherlands deployed in Indonesia. This intervention was essential in building trust between the two competent authorities. Thanks to the excellent work of PPATK and the use of direct diagonal co-operation, FIOD was able to properly target and draft its MLA request to achieve substantial results rapidly.

**Use of INTERPOL's I-FIU Connect to foster direct diagonal access and co-operation:** There are also international initiatives that help promote direct diagonal access and co-operation. For example, through the I-FIU Connect initiative, member countries' FIUs can gain instant, direct access to a wide range of INTERPOL criminal databases. Key databases include nominal data (containing personal data and criminal history of persons subject to international police co-operation) and records on fraudulent travel and identity documents. This access enables FIUs to leverage global police information directly, enhancing their ability to focus on targeting individuals and bank accounts linked to INTERPOL databases.

## 7. Transiting into investigation and prosecution

96. As competent authorities progress from investigation to prosecution, the need to obtain and secure court-admissible evidence through formal procedures becomes increasingly critical. This includes locating witnesses, securing their testimonies, and ultimately extraditing suspects to stand trial—measures that often require formal channels of co-operation, such as MLA requests.

97. In complex ML investigations, it is best practice to ensure that there is prosecutorial input from a very early phase. Where prosecutors also hold an investigative function, this can take the form of direct involvement in the investigative process. Where prosecutors do not hold an investigative function, this can take the form of advice which can assist in determining the shape and scope of the investigation. This is particularly important in large, transnational cases, where decisions may need to be made in an early phase as to the ambit of the investigation, number and identity of suspects, and potential charges. The early involvement of a prosecutor means that advice can also be provided about the steps that may need to be taken to ensure that information that is obtained is admissible in court, and that the need for international co-operation is identified as soon as possible, given the time that may be required to obtain material in an evidential form from overseas.

### 7.1. How to use informal co-operation to support formal co-operation

To maximise the chances of success through formal forms of co-operation, it is important that informal co-operation is leveraged as early as possible in this process. Where formal co-operation is required, competent authorities can first use the inherently faster, more agile, and flexible informal communication channels to collect intelligence that can lead to the identification of specific accounts, perpetrators, suspicious transactions and activities, which can narrow down the official MLA to more targeted evidence collection. Overall, it is not considered a best practice for countries to be sending completely “cold” MLA requests that arrive without warning, and without any prior consultation on its purpose. The use of informal co-operation in support of the formal request in an early phase facilitates smoother co-ordination, faster decision making, and prioritisation of requests. Prosecutors may engage informally with one another through longstanding bilateral channels of co-operation established between the prosecutors of certain jurisdictions; by working with networks of liaison prosecutors or magistrates deployed abroad (where such mechanisms exist), by communicating indirectly via domestic and foreign FIUs/LEAs, and/or by leveraging multi-lateral networks of prosecutors. In all cases, continuous communications—across both informal and formal channels—also help manage expectations and foster greater trust and familiarity with all stakeholders involved.

### Best practice: Informal co-operation between competent authorities in charge of MLA to navigate and support the official process

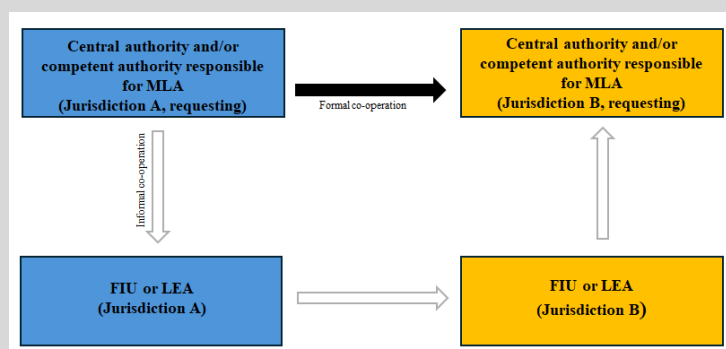
#### **Leveraging a network of liaison prosecutors/magistrates:**

Liaison prosecutors/magistrates are generally deployed on behalf of their domestic prosecuting authority to another jurisdiction where there is a high level of bilateral casework. They develop an in-depth understanding and knowledge of the legal framework and procedural requirements of their host jurisdiction and, being based in-country, will also benefit from direct and regular engagement with their prosecutorial counterparts in the foreign jurisdiction. They can support international co-operation by (i) advising domestic prosecutors of the requirements for making a request for assistance to another jurisdiction; (ii) engaging with their host country prior to the making of a formal request to determine whether the legal requirements are met or whether further information is required; (iii) assist with identifying where informal channels of assistance may be used; and (iv) engaging with the authorities of the host country to progress a request for assistance once it is submitted.

#### **Indirect communication through domestic and foreign**

**FIUs/LEAs:** Due to domestic legal constraints in some jurisdictions, many competent authorities responsible for MLA cannot engage directly with their foreign counterparts on an informal basis. Instead, co-operation generally occurs indirectly through local LEAs or FIUs who act as a conduit ensuring legal compliance. The domestic intermediary must then liaise with its foreign counterpart who will notify the competent authority. All along the process, it is important that a feedback loop is in place so that the intermediaries are aware of how the information has been used and any further requirements. This feedback strengthens trust and improves future co-operation. The information collected can then be used to guide and support the formal MLA process, ensuring that the request is targeted, detailed, and actionable information.

### Infographic 3. Indirect communication between competent authorities responsible for MLA through the conduit of FIUs/LEAs



**Direct communication through multi-lateral networks:** Informal co-operation between competent authorities in charge of MLA can happen directly, leveraging a dedicated multi-lateral network. Examples of networks and tools that can assist with establishing direct contacts between competent authorities and providing legal and practical information necessary to prepare an effective request for judicial co-operation or to improve judicial co-operation in general include:

#### **Global network**

- The **International Association of Prosecutors (IAP)**: The IAP is the only global network of prosecutors, with over 170 organisational members—including prosecution authorities, associations, and crime prevention agencies—and representing more than 250 000 prosecutors across 175 countries and regions. The IAP focuses on enhancing international co-operation among prosecutors by promoting formal and information mechanisms for co-operation and by providing a forum for prosecutors to connect directly with counterparts around the globe. Through its expanding online platform, it offers a digital database of prosecution contact points and specialists across a growing range of crime areas.

#### **Regional networks**

- The **European Judicial Network (EJN)** facilitates judicial co-operation in criminal matters among EU Member States to combat serious crime. EJN national contact points have online access to details of other network members, including counterparts in non-EU countries.
- The **West African Network of Central Authorities and Prosecutors Against Organised Crime (WACAP)** facilitates direct contacts between dedicated focal points in 16 West-African countries and provides secure communication channels.
- The **South East Asia Justice Network (SEAJust)** provides an informal platform for direct communication between central authorities across 22 jurisdictions to support mutual legal assistance in criminal matters.
- The **Judicial Cooperation Network for Central Asia and Southern Caucasus Network (CASC)** encompasses 8 countries across Central Asia and the Southern Caucasus to strengthen inter-regional judicial co-operation by facilitating direct communication between relevant central authorities and other national competent bodies.
- The **Southeast European Prosecutors Advisory Group (SEEPAG)** brings together 11 Southeast European Member States to facilitate judicial co-operation in major transborder

crime investigations. Each state designates a National Prosecutorial Focal Point responsible for enabling the swift exchange of information and evidence, whether through formal MLA or informal communication channels.

- The **Ibero-American Association of Public Prosecutors (AIAMP)**, comprising 22 Public Prosecutors' and Attorney General's Offices from Latin America, Spain, Portugal, and Andorra, fosters direct communication between prosecutorial authorities. By promoting both formal MLA and informal channels of co-operation, the AIAMP enables the timely and effective exchange of information critical to criminal investigations, thereby strengthening prosecutorial capacity across all stages of proceedings.

#### Other

- **UNODC's SHERLOC** knowledge management platform (<https://sherloc.unodc.org>) supports global efforts to combat organised crime, corruption, ML, and terrorism. It hosts several interlinked databases, including those on legislation, case law, and national and regional strategies—each searchable by keyword, country, crime type (including ML), and cross-cutting issues. SHERLOC also includes a treaties database detailing relevant international and regional instruments and their ratification status. A key feature is the **Directory of Competent National Authorities (CNA)**, which lists central authorities designated under various UN treaties to handle international co-operation requests in criminal matters, such as transnational organised crime, corruption, extradition, MLA, and asset recovery. The directory provides information on legal and procedural requirements, use of the UN Convention against Transnational Organised Crime as a legal basis, links to national laws and websites, and instances where INTERPOL channels may be used. Access to the CNA is restricted to competent national authorities and Permanent Missions to the UN, with accounts available upon request via the SHERLOC website. SHERLOC can support international co-operation in ML cases by allowing users to verify treaty participation, consult relevant legislation, identify appropriate national contacts, and review related case law. By promoting legal transparency and facilitating international co-operation, SHERLOC contributes to the effective implementation of AML/CFT measures in line with FATF recommendations.

Regardless of the network or tool used, requests for informal information exchange should be tailored to the specific jurisdiction and investigative needs—including the identification of the relevant predicate offence—and should not be indiscriminately shared with all available counterparts. It is also recommended that the competent



requesting authority remain concise and targeted and do not include the entire official trial report— including information that is not relevant to the request—in its request.

### ***Obtaining information requiring coercive powers and formal co-operation processes***

98. Certain types of information—such as banking and financial transaction records, as well as tax data—are essential to transform financial analysis and investigations into successful ML enforcement outcomes. However, access to this critical information for evidential purposes typically requires the use of coercive powers, which are generally only available through formal channels of co-operation.

99. Using informal co-operation prior to resorting to formal channels can allow competent authorities to be much more effective in obtaining the information and records of most relevance to them. Preliminary inquiries should be made to assess whether the data is available and relevant to the investigation/prosecution.

- *Validating nexus to foreign jurisdiction:* The information obtained through informal co-operation, particularly through the detection and investigation phase, strengthens the case for prosecutorial and judicial authorities to begin embarking early on the lengthy MLA process for obtaining information and evidence. Leveraging informal co-operation early also allows foreign counterparts to be put on alert that an MLA request may be incoming, allowing them to act on it instantly or conduct parallel informal checks in the interim. In addition, using informal co-operation may uncover the absence of any relevant assets, which may save jurisdictions from spending unnecessary resources on a futile MLA request.
- *Identifying unknown links and relevant transactions:* Informal co-operation can help competent authorities assess the extent of asset ownership within a foreign jurisdiction. For example, instead of sending an MLA request with extensive requests relating to “all forms of assets” owned by the criminals, informal co-operation can allow competent authorities to clearly target which assets are relevant to the ML offences committed. In addition, the information from the foreign counterparts is used to formulate and streamline MLAs by e.g., narrowing and identifying a specific period or range of transactions that is relevant to the investigation/prosecution. Sending a targeted MLA request greatly facilitates and accelerates the rate of response eventually.

### ***Locating persons***

100. Beyond financial information and data, other types of formal assistance that can be requested include:

- Obtaining the arrest and extradition of criminals to be prosecuted domestically; and
- Obtaining witness testimony or serving notices to be used as evidence.

101. Similar to the approach above on information requiring coercive measures and formal co-operation processes, informal co-operation can be used prior to

utilising formal assistance methods. Some useful steps to take to maximise success include:

- Informal co-operation to first confirm the full details and particulars of the persons of interest. For example, information can first be gathered on whether the person is located within the receiving jurisdiction, the address of the person to serve notice. If the person is not physically located within the receiving jurisdiction, counterparts should collaborate and assess whether the person of interest is likely to return and determine future possible steps that can be taken.
- In instances of witness testimony, prior informal co-operation can come in the form of voluntary interviews with witnesses to ascertain whether they have relevant and sufficient evidence or knowledge of the matter at hand. This helps to quickly establish whether there is value in proceeding with formal requests to secure their evidence.

102. INTERPOL's Red Notices (for arrest and extradition) and Blue Notices (witnesses) may be useful informal mechanisms for competent authorities to leverage and kickstart the formal process early.

#### **Tool: INTERPOL's color-coded notices and diffusion systems to locate persons of interests**

INTERPOL's color-coded notices and diffusion systems, which are international requests for co-operations or alerts allowing police in member countries to share critical crime-related information, are a useful tool to initiate the formal co-operation process early. Its Red Notice (to seek the location and arrest of a wanted person, with a view to his/her extradition) and Blue Notice (to locate, identify, or obtain information on a person of interest in a criminal investigation) may be of particular relevance to mutual legal assistance and extradition requests. INTERPOL's notices and diffusions are sent through its I-24/7 secure communications network to one, several, or all INTERPOL member countries, which can choose to act on it in accordance with their national laws.

#### ***Understanding formal requirements***

103. A basic challenge is understanding the legal requirements and standards to meet thresholds for progressing MLA requests. There are some ways where informal co-operation can help bridge this gap:

- *Alignment:* Case alignment with the legal framework of the receiving country can avoid unnecessary delays or denials. Informal communications can help quickly establish the legal requirements needed to obtain specific types of formal assistance early, and guide domestic investigators and prosecutors to work towards that goal. Informal co-operation can also help identify the right contacts for the formal MLA request, and trigger alignment of expectations early. It is important to remember that the assistance that can be provided will vary between jurisdictions—for example, some jurisdictions will enable a witness statement to be obtained from a voluntary witness via informal

channels for evidential use, whereas others will require an MLA to be submitted to obtain the statement. As such, it is vital to understand, in an early phase, what can be obtained and how it can be obtained.

- *Identifying procedural barriers:* Informal co-operation can be used to identify any procedural barriers and potential grounds for rejection, including privacy concerns or dual criminality issues. The flexibility of informal co-operation can help counterparts understand the necessary specific documentation or additional details required to overcome these barriers, which will minimise any back-and-forth. This enables the requesting authority to fine-tune its formal request, speeding up the formal process, and accordingly increasing the chances for a higher success rate.
- *Correct format:* Formal requests may also require following a stricter format to facilitate legal processing by foreign authorities. Informal co-operation can help ensure that formal assistance requests are drafted correctly, realistically achievable in the time frame, and appropriate for the receiving agency/jurisdiction, and thus result in minimising delays. For example, some jurisdictions have developed MLA request templates that were drafted to accelerate processing through their judicial framework, which can be made known and shared early with competent authorities through informal co-operation. Informal co-operation can also take place in the form of mutual training and dialogues on how MLA requests should be written.

104. Once it has been considered that a formal co-operation request is necessary, informal co-operation networks such as INTERPOL (via the I-24/7 channel) or Eurojust can support the preparation of MLA requests helping with an early assessment of the required information, and ensuring that the subsequent MLA request is complete, meets the necessary legal requirements and standards, uses the correct formats, and can be acted upon quickly. This is particularly relevant in ML cases, where timely action is essential.

105. Additionally, the same INTERPOL channel can allow the real-time and secure transmission of MLA requests, acting as an effective alternative in the absence of an MLA treaty, pre-existing bilateral channels, or diplomatic relations between jurisdictions.

## 7.2. Obtaining evidence via informal channels

106. Aside from formal channels, there are some types of information that can be directly exchanged as evidence via informal LEA and prosecutorial channels and networks. However, FIU-to-FIU exchanges are rarely used to directly collect evidence. Given the nature of intelligence agencies (including FIUs), the exchange of evidence via FIU-centric networks is generally not permissible.

107. While admissibility of evidence is dependent on the respective jurisdictions' judicial processes, there are some principles that appear to facilitate competent authorities' willingness to permit such direct transmission in the first place:

- The information is "open-sourced" and is typically collected and/or maintained by other governmental authorities. Such information can include commercially held data, with key examples as corporate commercial records (e.g., corporate incorporation records and reports, land and/or other asset ownership records etc.);

- This information does not require coercive powers for access, and is not restricted by privacy laws. If so, such evidence and information may typically need to be obtained through formal channels of co-operation.

108. In addition, direct co-operation with foreign service providers can also be an alternate avenue to obtain the necessary evidence. For example, in instances of digital evidence, some foreign service providers allow competent authorities to approach them to gather the relevant digital evidence through direct voluntary co-operation<sup>12</sup>.

### **Best practice: How the United States leverages informal co-operation to obtain publicly available records**

In the United States, informal co-operation is possible in cases where compulsory measures—such as court orders or search warrants—are not required. The most common form of such co-operation involves the exchange of publicly available information, including incorporation records, property records, and certain court documents, such as conviction records.

To facilitate these exchanges, U.S. authorities leverage various informal co-operation channels, selecting those most appropriate to the specific legal context, case requirements, and countries involved.

The FIU and LEAs have access to several multilateral networks that support informal co-operation, including:

- The Camden Asset Recovery Inter-Agency Network (CARIN) and regional affiliated Asset Recovery Interagency Networks (ARINs)
- The International Anti-Corruption Coordination Centre (IACCC)
- The Egmont Group
- INTERPOL

These networks enable the United States to exchange and receive information on MLA procedures, rules, and requirements prior to the submission of formal requests. They also support follow-ups on prior MLA requests, identification of relevant foreign counterparts, and provision of contact information to facilitate timely communication. Additional advantages include access to open-source data, urgent communication channels, the ability to request the initiation of foreign investigations, tools for locating and identifying suspects, and the development of co-operative case strategies with international partners.

U.S. LEAs also engage in bilateral co-operation through channels established via U.S. embassies and consulates. These efforts are often grounded in multilateral frameworks, such as Article 9 of the UN Convention against Illicit Traffic in Narcotic Drugs and Psychotropic

<sup>12</sup> See also Council of Europe (July 2020) The Budapest Convention on Cybercrime: benefits and impact in practice for more information on voluntary co-operation with foreign service providers.

Substances. Federal LEAs maintain a global presence, with representatives stationed in many U.S. embassies. These officials facilitate informal support for foreign investigations by acting as liaisons between U.S. agencies and foreign authorities. Practitioners from other jurisdictions may reach out to these officials to seek guidance or discuss matters prior to submitting formal co-operation requests, including confirming what information can be obtained without a formal request and obtaining access to such records.

In addition to the FIU and law enforcement, regulatory and supervisory agencies in the U.S. maintain robust international co-operation mechanisms that facilitate their access to information. For example: The Securities and Exchange Commission (SEC) primarily relies on two multilateral MoUs established through the International Organization of Securities Commissions (IOSCO). These non-binding agreements are key tools for the SEC to obtain information from foreign securities regulators. Under the MoUs, assistance may include access to bank records, brokerage data, and beneficial ownership information. The Enhanced MoU further expands co-operation to include audit work papers, compelled testimony, assistance with asset freezes, and access to Internet service provider and telephone records.

## 8. Joint analysis and investigations

109. Joint analysis and investigations both refer to a collaborative effort by competent authorities to work together for a dedicated period of time on specific investigations or cases involving in-depth collaboration. While joint analysis takes place in an intelligence-sharing framework, it is typically pursued by FIUs and LEAs, and involves the detection of ML activities/targets and surfacing methodologies, conducting joint investigations by LEAs (and judges with investigative powers, where allowed), and carrying on criminal investigations in a judicial setting.

110. Joint analysis and investigations may be carried out through or facilitated by multi-lateral networks offering dedicated frameworks for these activities. Examples of multi-lateral networks providing for joint analysis include: INTERPOL, the Egmont Group of FIUs, AMON, the EU's AMLA, and the CIS. Frameworks for joint investigations include: INTERPOL's Operational Support Teams, Europol's Operational Task Forces, Working Groups under the Five Eyes Law Enforcement Group, JITs possibly with the support and participation of Eurojust, and JITs in the Territories of the Member States of the CIS. The FATF Standards require LEAs to be able to form JITs to conduct co-operative investigations, and, when necessary, establish bilateral or multilateral arrangements to enable such joint investigations.

111. Regardless of the framework in which they are conducted, joint analysis and investigations can very efficiently connect the right areas of the competent authorities at the practitioners' level. They facilitate the initiation of collaborative work with minimal bureaucratic friction, enabling the direct gathering and exchange of information and evidence—often without the need to rely on traditional MLA channels. Practitioners from different jurisdictions are well positioned to accurately and concretely advise on how to navigate operations and information collection in their jurisdictions. This not only enhances mutual understanding of capabilities and priorities but also significantly reduces response times and creates opportunities for innovative operations, as exemplified below:

### Best practice: Joint analysis and investigations

#### **A joint analysis by the FIUs of Italy, Spain, and Netherlands:**

In 2024, FIU Italy launched a joint analysis exercise together with FIU Spain and FIU Netherlands in order to deepen a cross-border complex ML scheme involving an international financial group channelling large amount transactions across Europe to Asian countries. The scheme was initially detected through the analysis of a high number of STRs received in the past two years concerning illicit funds transferred to a Spanish payment account belonging to a Dutch payment agent, and involving Italian companies owned by Chinese citizens implicated in fiscal and public aid frauds. The analysis started focusing on the activities performed by the Dutch payment agent in the European Economic Area. This agent appeared on websites as “bank or payment institution” but had no actual licenses in Europe. Additional data was collected from the main Italian reporting entities, who detected over 33 million euros transferred to Spain from January 2022 to September 2023. The three EU FIUs also requested data from the national supervisory authorities and reporting entities, Customs agencies, and foreign FIUs whose countries were involved in the flows of funds. The analysis uncovered the pivotal role played by the payment agent, who turned out to belong to an international financial group with branches in Europe, America, and Africa, responsible for having laundered 95 million euros from 2021 to 2024. The extended geographical distribution, the diversification of financial licenses, and the lack of a global supranational view on the cross-border activities performed seem to have facilitated the agent’s activities. This joint analysis was conducted rapidly and with direct and efficient co-operation from all parties involved. Sharing not only raw data but also specific analysis and expertise enabled a global and common perspective to emerge among all participants. Once finalised, the analysis was disseminated for further actions with the relevant national law enforcement and supervisory authorities of all the participating jurisdictions.

#### **Operation AVARUS-X, an Australian-based joint investigation:**

Active from 2022, Australian Federal Police (AFP) led Operation AVARUS-X, an Australia-based joint investigation that dismantled a money-laundering organisation (MLO) that controlled and criminally exploited a nationwide chain of legitimate money service businesses transferring billions of AUD per year. The controllers were suspected to have had a footprint in at least four other countries. Through the informal collaborative structure of a Five Eyes Law Enforcement Group (FELEG) money laundering working group, and the AFP international network of liaison officers, investigators shared information with foreign law enforcement partners and a joint investigation was commenced with the U.S. Homeland Security Investigations (HSI). The joint investigation involved members of U.S. HSI physically sitting with the



investigation team in Australia. This enabled an ongoing direct exchange of intelligence and information between the U.S. and Australian partners. Investigators and intelligence analysts from other partner agencies, including Australia's FIU ASTRAC, were also embedded in the investigation team. An information-sharing mechanism with five major Australian banks was initiated to improve the efficiency of domestic financial enquiries. Even though ultimately the prosecution occurred only in Australia, the operation benefited from close co-operation between the international agencies in gathering evidence, eliminating avenues of inquiry and other suspects, sharing insights into ML methodology, and leveraging of each other's capabilities. The money service business chain was dissolved after police intervention in late 2023. A criminal prosecution of the alleged principals of the MLO is ongoing.

**A parallel investigation between the United States and India leading to the dismantling of a major drug trafficking organisation laundering proceeds through virtual assets:** In 2022, the U.S. Department of Justice sought assistance from the government of India under the Treaty on Mutual Legal Assistance in Criminal Matters to investigate a major drug trafficking organisation led by two brothers, Mr. P and Mr. B. The organisation was involved in the illicit distribution of drugs including fentanyl, heroin, and LSD, and operated through encrypted communications, dark web marketplaces, and cryptocurrency wallets—making it highly sophisticated and difficult to trace. The investigation revealed that the brothers controlled over 8 500 bitcoins, valued at approximately USD 150 million at the time, which were used for ML and to finance drug trafficking activities. The organisation concealed these assets and their activities through complex transactions involving cryptocurrency exchanges and dark web platforms. In response to the U.S. Department of Justice's request, India's Enforcement Directorate (ED) launched a parallel investigation focused on the organisation's financial networks. The ED obtained key financial records uncovering transfers through a digital payment service provider exceeding Rs. 5.54 crore to the group. In April and May 2024, searches led to the seizure of 268.22 bitcoins, worth approximately Rs. 130 crore, which were frozen, along with the provisional attachment of assets worth Rs. 9.67 crore linked to Mr. B and his wife. This case is a strong example of real-time, cross-border co-ordination between the authorities of India and the United States. U.S. officials travelled to India to assist directly in the investigation, including during interviews of the accused, contributing significantly to its progress. The ongoing exchange of intelligence ensured the investigation remained effective and uninterrupted. In April 2024, Mr. P was arrested, and a Prosecution Complaint was subsequently filed, marking a major step in dismantling the transnational drug trafficking network.

**Example of a joint investigation supported by INTERPOL:** In October 2022, authorities in Singapore arrested an individual for trafficking 20 pieces of rhino horns weighing approximately 34.7 kg, involving the proceeds of crime of about USD 1 million. The arrest occurred while the individual was transiting through Singapore, and the rhino horns were seized by the authorities. To support the investigations, INTERPOL deployed an Operational Support Team (OST) to South Africa alongside investigators from Singapore. Through this OST deployment, the Singaporean investigators submitted samples of the seized rhino horns for further DNA analysis and matching in South Africa. This confirmed that the seized rhino horns had originated from 16 rhinoceros in South Africa. INTERPOL also facilitated further co-ordination among LEAs from various countries, enabling intelligence and information exchange that revealed the wider network of those involved in the illegal rhino horn trade. Arising from the multinational joint investigation facilitated by INTERPOL, Singaporean investigators were able to obtain crucial evidence from their foreign counterparts, resulting in the conviction in court.

112. As previously discussed,<sup>13</sup> joint analysis and investigations can present a number of challenges. For such collaborative efforts to be effective, they must be mutually beneficial, underscoring the importance of a careful assessment of the need for collaboration and the identification of a shared objective. Key criteria for determining whether to initiate a joint analysis or investigation include the complexity and sophistication of the criminal network or activities under scrutiny, the scale and intricacy of the investigative measures required across the participating jurisdictions, and the degree of interconnection between investigations. Before initiating a joint analysis or investigation, all parties must reach a clear agreement on their respective roles and commit to contributing relevant information and expertise. Ultimately, the success of joint analysis and investigations hinges on a high level of mutual trust and the establishment of common terms of reference.

## 8.1. Building trust

113. Trust is fundamental to all forms of co-operation, even more so in joint collaboration where highly sensitive and targeted information could be shared. Trust can be difficult to build, particularly when involving competent authorities who may not be familiar with working with each other at the start. Institutional trust is often based on personal trust, and building personal trust is more likely where there are commonalities of role, priority and purpose. This is why building trust is particularly challenging in instances of diagonal co-operation in joint analysis and investigation, where non-direct counterparts have no experience with working with each other.

114. To begin building trust, joint collaboration can first consider working on a strategic level, where information tends to be less sensitive than specific operational leads. Some good examples of how strategic joint collaboration can look include:

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<sup>13</sup> See Section on Joint analysis and investigation.

- Analysing and studying strategic insights, information and trends, to develop a collective risk assessment and understanding.
- Implementing joint training sessions, exchanging of operational experiences and best practices.
- Holding frequent inter-jurisdictional meetings, including in-person meetings. Regular dialogue among all participating authorities creates familiarity and trust, as well as understanding of different limitations amongst competent authorities.

115. Trust that is built upon continuous collaboration and successful outcomes can thereafter be leveraged by turning to joint analysis and investigation on operational cases.

116. Some good examples that have leveraged this process of trust building are the Financial Intelligence Consultative Group (FICG) and Pacific Financial Intelligence Community (PFIC), which started with strategic intelligence sharing related to prominent risks, typologies, indicators, as well as regional risk assessments on thematic issues. Since then, these groups have moved to work on more operationally centric and actionable intelligence outcomes. In many instances, this work leads to long-term strategic outcomes, such as enhanced internal work methodologies and tools, derived from best practices learned within the joint analysis process, jointly written indicators papers, identification of the real dimensions of regional risks, and therefore, more effective application of the risk-based approach, identification of new risks, etc.

### **Best practice: Start building trust at a regional level with the Egmont Regional Groups**

Egmont Group Regional Groups play a crucial role in trust-building among FIUs by fostering stronger regional co-operation through joint initiatives, enhanced dialogue, and capacity-building efforts. By organising regional trainings and technical assistance programs, these groups help FIUs develop specialised skills, improve analytical capabilities, and adopt best practices in combating ML and terrorist financing. Through structured and regular engagements, such as workshops, case studies, and operational exercises, FIUs build confidence in each other's expertise and commitment to fighting financial crime. Additionally, by sharing region-specific ML/TF risk assessments, vulnerabilities, and typologies, these groups create a common knowledge base that allows for more effective detection, prevention, and enforcement strategies. This collaborative framework not only enhances intelligence sharing and joint investigations but also strengthens institutional trust, ensuring that member FIUs can work together efficiently.

## **8.2. Creating common terms of reference**

117. The formation of a joint analysis or investigation should be based on a common objective. However, the perceived “best path” towards this common objective can be diverse based on the perspectives of the different competent

authorities. It is thereafter imperative that common expectations are established at the start of collaboration so that everyone is aligned on how they can contribute towards the common goal. This can include:

- Selecting a case, topic, or theme that is relevant and recognised as a priority by all participating authorities;
- Having clear, pre-established agreements on roles, responsibilities, techniques to be used, locations, guarantees to respect the principle of proportionality and the suspects' human rights, and other legal provisions, in order to mitigate jurisdictional issues. This is particularly so when it involves diagonal co-operation, with different competent authorities having different powers and access to information; and
- Identifying and streamlining the range of resources and expertise for the shared purpose, including any issues related to administration, equipment, and costs.

118. It is also important to align on how individual partners should operate as each jurisdiction can have different ways of analysing, investigating and communicating information. A clear operating framework should be established, ideally covering:

- Using standardised formats to facilitate the sharing and comparison of data. These formats help mitigate the risk of misinterpretation and reduce time spent on reconciling different data structures.
- Agreed and common methodologies and data analysis techniques. This ensures that information that is exchanged is interpreted consistently across jurisdictions, minimising misaligned conclusions.
- Identifying the platform of communication. Leveraging the common secured communication networks offered by multi-lateral networks such as Egmont and INTERPOL can be useful to address data security concerns and ensure that the information requested or obtained is made through an authorised source via a secure platform.
- Common terminology or labels. Joint analysis and investigative exchanges should be clearly labelled (e.g., "CASE Co-operation") to facilitate access to relevant information. Without specific labels information can be easily "lost", meaning the counterpart may not always recognise its connection to the specific joint work.

**Best practice: INTERPOL's global police operations against financial crime**

INTERPOL regularly co-ordinates global operations to strengthen international collaboration against financial crime. One example is Operation Jackal, which targets the West African organised crime groups responsible for perpetuating a large volume of online fraud globally, as well as its related ML activities. These operations gather participating jurisdictions under a common setting to identify cases, exchange intelligence, and meet face-to-face. Participation in such operations fosters trust, develops an informal network of specialised practitioners, and strengthens joint enforcement efforts across jurisdictions. INTERPOL can further assist member countries participating in the operation by providing operational analysis, offering case co-ordination guidance between countries and related national agencies, and providing on-the-ground assistance through the deployment of Operational Support Teams.

## Conclusion

119. The reality of international co-operation on AML is that there is no universal set of rules or practices that applies in every context. To achieve the best outcomes, practitioners are encouraged to carefully select the co-operation channel or tool that aligns with the legal framework, case objectives, and jurisdictions involved.

120. While there is no one-size-fits-all approach, successful results often come down to the decisive role played by informal co-operation. When used at the earliest possible phase, informal co-operation complements and supports formal processes which may be slower and more burdensome. It provides fast, agile, and targeted solutions to jurisdictions faced with the challenge of an increasingly cross-border nature of criminal activity and the nearly ubiquitous practice of laundering illicit funds through and to multiple jurisdictions.

121. Provided that key success factors and best practices are followed, informal co-operation offers a strategic approach for competent authorities responsible for AML efforts to tackle the challenges posed by changing criminal and technological landscapes:

- For instance, faced with the challenge of *volume* (i.e., an increasing number of cases to manage), competent authorities can explore the use of standardised processes backed by digital tools or consider their participation in joint analysis and investigations.
- The challenge of *speed* (i.e., a faster information exchange) may be addressed by making requests and answers more targeted and actionable, drawing on templates and digital solutions, providing multi-step answers, implementing single points of contact, developing structured communications, and using more diagonal co-operation, where permitted.
- To meet the challenge of *quality* (i.e., access to value-added information through actionable and targeted requests triggering comprehensive answers), competent authorities may deepen their understanding of their partners' capacities, priorities, and needs and consider the full range of opportunities offered by informal co-operation in terms of scale and frameworks (bilateral/multi-lateral, regional/global, permanent networks/temporary working groups) to get access to the broadest spectrum of information. They can uphold the principle of reciprocity, and encourage continuous communications and feedback. They are also encouraged to prioritise confidentiality and data integrity, implementing prior consent for dissemination and utilising secure communication tools.
- The challenges raised by *differences* in legal frameworks, language, vocabulary, access to information, and priorities may be mitigated through the use of common terms of reference, guidelines, templates, directories, and a thorough understanding of international partners' capabilities and expectations.

122. Trust emerges as the result of these efforts. When carried out properly, informal co-operation works as a self-reinforcing loop. The more competent authorities find value in co-operating with each other, the more they trust each other, and the more co-operation strengthens. At the heart of this dynamic lies a shared commitment to a common purpose: the effective combatting of ML in all of its forms.

Importantly, competent authorities must fully embrace the mindset that international co-operation is a collective responsibility pursued for a broader global interest.

123. Another major key takeaway of this handbook is that effective informal co-operation always starts at home with agencies equipped with the necessary legal capacities, sufficient human, financial and technological resources, operational independence and autonomy to engage in international co-operation, and the existence of solid domestic co-ordination mechanisms. Domestic co-ordination indeed serves as the cornerstone of any successful informal co-operation on ML detection, investigation, and prosecution.

124. This is why this handbook is complemented in annex A.1., A.2., and A.3. with three operational brochures addressing the practical challenges faced by three specific sets of actors of the AML-community (i.e. FIUs, LEAs, and prosecutors) when it comes to co-operating internationally. These brochures should not be read in isolation, but rather in constant reference to each other. Through them, each type of actors will benefit from understanding the two other's daily operations, concurring to build common grounds for international co-operation. More importantly, these brochures can be seen as calls for action. They are designed to encourage the competent authorities, within legal limits and with flexibility, to fine-tune their tools and practices, to ensure they maximise their capacities, and to experiment with new approaches, in order to fully leverage the opportunities offered by informal co-operation.

#### Infographic 4. Articulation between informal and formal co-operation and types of competent authorities

