INTER-GOVERNMENTAL ACTION GROUP AGAINST MONEY LAUNDERING IN WEST AFRICA



Operational Manual for AML/CFT/CPF Inter-Ministerial Committees/National Coordination Committees (IMCs/NCCs) of GIABA Member States

© February 2026

FOREWORD

Effective national coordination is the backbone of a resilient Anti-Money Laundering, Countering the Financing of Terrorism, and Countering Proliferation Financing (AML/CFT/CPF) system. Across GIABA Member States, Inter-Ministerial Committees/National Coordination Committees (IMCs/NCCs) serve as the central platform through which governments translate political commitment into strategic action, institutional coherence, and measurable impact. Strengthening these committees is therefore fundamental to achieving sustainable compliance with the Financial Action Task Force (FATF) Standards and ensuring that national responses remain agile in the face of evolving threats.

This Operational Manual provides a comprehensive, practical and forward-looking framework to guide the establishment, functioning, and long-term sustainability of IMCs/NCCs. It brings together international standards, regional obligations, and global best practices to support Member States in building coordination mechanisms that are structured, inclusive, transparent, and capable of driving whole-of-government responses to Money Laundering (ML), Terrorist Financing (TF), and Proliferation Financing (PF).

Grounded in the principles of risk-based policymaking, interagency collaboration, and continuous improvement, the Manual equips policymakers, regulators, law enforcement agencies, and other national stakeholders with clear procedures for decision-making, documentation, monitoring and evaluation, policy development, and engagement with both domestic and international partners. It also emphasises the importance of emerging themes such as virtual assets, digital tools, cross-border cooperation, and sustainability ensuring that national frameworks evolve in line with the rapidly shifting financial crime landscape.

Importantly, this Manual underscore the role of IMCs/NCCs as catalysts for national cohesion. Their leadership in guiding National Risk Assessments, driving reforms, coordinating implementation of mutual evaluation recommendations, and promoting dialogue with the private sector and civil society is essential for building trust, accountability, and shared responsibility across the AML/CFT/CPF ecosystem.

Furthermore, the Manual reinforces GIABA's commitment to supporting Member States through technical assistance, peer learning, policy guidance, and regional cooperation. By institutionalising best practices, fostering information sharing, and enhancing operational readiness, GIABA seeks to ensure that all Member States are equipped to implement effective, proportionate, and sustainable responses to ML/TF/PF threats.

It is my hope that this Operational Manual will serve as an authoritative reference and a practical tool for all stakeholders involved in strengthening national coordination frameworks. Its effective implementation will not only improve compliance with international standards but also enhance regional stability, promote financial integrity, and contribute to secure and resilient economies across West Africa.

Director General

ACKNOWLEDGEMENT

The Intergovernmental Action Group against Money Laundering in West Africa (GIABA) extends its profound appreciation to all individuals and institutions whose contributions made the development of this "Operational Manual for AML/CFT/CPF Inter-ministerial Committees/National Coordination Committees (IMCs/NCCs) of GIABA Member States" possible.

GIABA expresses its deep gratitude to the Director General, **Mr. Edwin W. HARRIS, Jr.**, for his strategic leadership and consistent commitment to strengthening national coordination mechanisms across the region. His vision and support provided the enabling environment necessary for the completion of this important manual.

Special acknowledgement is extended to the Director of Policy and Research, **Mr. Muazu UMARU** for leading the conceptualisation, drafting and refinement of this document. The dedication, technical expertise, and coordination provided by the Director was instrumental in shaping a comprehensive, practical and forward-looking manual. Appreciation is also conveyed to **Mr. Momodou SAHO**, Policy Officer and **Mr. Emil MEDDY**, Research and Documentation Officer from the Directorate of Policy and Research, for their diligent support throughout the drafting, review and editing and finalisation of the Operational manual.

GIABA further acknowledges with gratitude the European Union and Expertise France for their foundational contribution to this work. In December 2020, Expertise France, on behalf of the EU-funded *Organized Crime: West Africa Response on Money Laundering (EU OCWAR-M)* Project, commissioned a regional study to assess the functionality, strengths, and challenges of AML/CFT Coordination Committees in West Africa. This study, conducted from January 2021 to October 2021, provided a rich evidence base and critical insights that significantly informed the structure, content, and recommendations contained in this Operational Manual.

Finally, GIABA recognises the broader community of stakeholders including national authorities, development partners, and practitioners across GIABA member states, whose continuous engagement and commitment to enhancing AML/CFT/CPF coordination remain central to the effectiveness of national frameworks. Their collective contributions and cooperation continue to advance the region's efforts to build resilient and compliant financial systems.

GIABA sincerely appreciates the dedication and collaboration of all who contributed, directly or indirectly, to the successful preparation of this manual.

TABLE OF CONTENTS

1.1 Introduction....9
1.2 Purpose and Scope....9
1.3 Key Themes and Content....9
1.4 Structure of the Manual....10
1.5 Intended Outcomes....10
1.6 Understanding and Addressing ML/TF/PF risks....10
1.7 Coordinating National Policies in Alignment with FATF Recommendations 1 and 2....11
1.8 Ensuring Effective Interagency Collaboration, Resource Allocation, and International Compliance....12

2. Legal and Institutional Framework....13
2.1 Establishment....13
2.2 Mandate....13
2.3 Membership....14
2.4 Institutional Interactions....14
2.5 Committee Structure....14
2.6 Key Functions....15

3. Operational Guidelines....17
a. Meeting Frequency....17
b. Decision-Making....17
c. Documentation....17
d. Evaluation Metrics....18

4. Integration with Regional Frameworks....19
4.1 International Reporting....19
4.2 Key Benefits of Regional Integration....20
4.3 Public-Private Partnerships (PPPs) in AML/CFT/CPF....21

5. Challenges and Mitigation Strategies....23
5.1 Resource Constraints....23
5.2 Capacity Gaps....23
5.3 Coordination Challenges....24
5.4 Institutional Memory....24
5.5 Performance Reviews....25
5.6 Community Engagement:....25
5.7 Additional Cross-Cutting Challenges....26
5.8 Summary....26

6. Emerging Risks in AML/CFT/CPF....27
Virtual Assets and Digital Currencies....27
Cross-Border Risks....28
6.1 Key Considerations for Addressing Emerging Risks....29
6.1.1 Technology as a Strategic Tool....29
6.1.2 Capacity Building....29
6.1.3 Stakeholder Collaboration....29
6.1.4 Continuous Risk Assessment....29

6.2 Digital Tools for Collaboration in AML/CFT/CPF Frameworks....29
6.2.1 Secure Databases for Centralised Information Sharing....30
6.2.2 Blockchain Technology for Financial Transaction Tracking....30
6.2.3 Virtual Collaboration Platforms....30
6.2.4 Artificial Intelligence (AI) and Data Analytics Tools....31
6.2.5 Case Management Systems....31
6.2.6 Secure Data Transfer Protocols....31
6.2.7 Integrated Intelligence Platforms....31
6.3 Summary....32

7. Sustainability....33
7.1 Key Benefits of Sustainability and Impact....33
7.2 Resource Mobilisation Plan....33
7.3 Recommendations for Effective Resource Management....34
7.3.1 Key Recommendations....34
7.3.2 Long-Term Vision....35
7.3.3 Future Challenges and Threats....35
7.4 Strategies for Adaptation....35
7.5 Key Outcomes of Emphasising Sustainability....36

8 Conclusion....37
Annex 1....38
Sample Memorandum of Understanding (MoU) for enhancing Interagency Cooperation
Annex 2....40
Sample Memorandum of Understanding (MoU) for Establishing a Joint Operational Task Force
Annex 3....43
Sample templates for key tasks - meeting agendas, risk update, and progress reports

TABLE OF ACRONYMS

Acronym	Full Meaning
AI	Artificial Intelligence
AML	Anti-Money Laundering
AOB	Any Other Business
CDD	Customer Due Diligence
CPF	Countering Proliferation Financing
CSO	Civil Society Organisation
DeFi	Decentralised Finance
DNFBP	Designated Non-Financial Business and Profession
ECOWAS	Economic Community of West African States
FIU	Financial Intelligence Unit
FATF	Financial Action Task Force
GIABA	Inter-Governmental Action Group against Money Laundering in West Africa
IMC	Inter-Ministerial Committee
JOTF	Joint Operational Task Force
KYC	Know Your Customer
LEA	Law Enforcement Agency
MER	Mutual Evaluation Report
ML	Money Laundering
MoU	Memorandum of Understanding
NCC	National Coordination Committee
NPO	Non-Profit Organisation
NRA	National Risk Assessment
OSINT	Open-Source Intelligence
PF	Proliferation Financing
PPP	Public–Private Partnership
STR	Suspicious Transaction Report
TBML	Trade-Based Money Laundering
TF	Terrorist Financing
UNSCR	United Nations Security Council Resolution
VA	Virtual Asset
VASP	Virtual Asset Service Provider

1

INTRODUCTION

1.1 Introduction

The Interministerial Committee (IMC) or National Coordination Committee (NCC) serves as the central mechanism for strategic and operational coordination of AML/CFT/CPF efforts in GIABA member states. These committees are essential to implementing effective, cohesive, and proactive measures to combat ML/TF/PF.

This Operational Manual is meant to standardise and enhance the operations of IMCs/NCCs, which serve as critical national bodies for enhancing compliance with international standards and building robust AML/CFT systems in GIABA member states. These committees are at the forefront of national efforts to combat financial crimes, serving as the principal mechanism for coordinating strategies, policies, and operational responses to ML/TF/PF.

The manual integrates international standards, regional mandates, and practical operational guidelines to ensure that IMCs/NCCs are effective, resilient, and capable of adapting to the evolving threat landscape. It is structured to provide clarity on the committees' foundational principles, operational processes, and performance expectations.

The manual serves as a vital resource for policymakers, committee members, and stakeholders involved in AML/CFT/CPF efforts, enabling them to coordinate, implement, and monitor strategies with efficiency and accountability. It is both a guide and a strategic tool to ensure that national systems are robust, compliant, and effective against financial crimes.

1.2 Purpose and Scope

- **Purpose**: To serve as a foundational document that defines the role, structure, and functions of IMCs/NCCs, ensuring their alignment with the Financial Action Task Force (FATF) Recommendations and GIABA's regional guidance.
- **Scope**: Applies to all GIABA member states, providing a unified framework that considers both global AML/CFT/CPF standards and regional-specific challenges.

1.3 Key Themes and Content

1. Central Role of IMCs/NCCs

- Describes the IMCs/NCCs as the cornerstone of national AML/CFT/CPF frameworks.
- Emphasises their responsibility to foster collaboration among government agencies, private sector stakeholders, and international bodies.

2. Alignment with International Standards

- Highlights the committees' critical role in ensuring compliance with FATF Recommendations 1 (Risk-Based Approach) and 2 (National Cooperation and Coordination).
- Stresses the importance of integrating the findings of National Risk Assessments (NRAs) and deficiencies identified in Mutual Evaluation Reports into actionable policies and strategies.

3. Policy and Operational Coordination

- Explains how the committees are instrumental in developing national AML/CFT/CPF strategies and monitoring their implementation.
- Describes their function in resolving interagency conflicts and enhancing communication to prevent redundancies or inefficiencies.

1.4 Structure of the Manual

Legal and Institutional Framework

- Provides guidance on the legal establishment of IMCs/NCCs through national instruments.
- Defines their mandate, governance structure, and relationship with key stakeholders.

Committee Structure

- Details the roles and responsibilities of key positions, including the Chairperson, Secretariat, and specialised sub-committees.
- Outlines how the committees are organised to ensure effective decision-making and operational efficiency.

Operational Guidelines

- Includes practical directives on meeting frequency, decision-making processes, documentation standards, and evaluation metrics.
- Encourages the use of technology to enhance collaboration and streamline operations.

Integration with Regional Frameworks

- Highlights the committees' role in engaging with GIABA, FATF, and other regional and international organisations.
- Encourages participation in workshops, mutual evaluations, and knowledge-sharing forums.

Challenges and Mitigation Strategies

- Identifies common obstacles such as resource constraints, capacity gaps, and coordination challenges.
- Provides actionable solutions to address these challenges, including advocacy for funding, training programs, and enhanced interagency collaboration.

Sustainability and Impact

- Focuses on long-term effectiveness through institutional memory, performance reviews, and community engagement.
- Highlights the importance of engaging private sector stakeholders and civil society to build trust and enhance compliance.

1.5 Intended Outcomes

- To equip IMCs/NCCs with a clear roadmap for implementing effective AML/CFT/CPF measures.
- To ensure that GIABA member states can meet their national, regional, and international obligations while effectively mitigating ML/TF/PF risks.

Through the effective coordination of policy formulation, implementation, and resource allocation, the IMCs/NCCs ensure that GIABA member states remain resilient against financial crimes and uphold global compliance standards. Their key functions ensure that national policies and practices are effective, risk-responsive, and aligned with international standards, such as those set by the FATF.

1.6 Understanding and Addressing ML/TF/PF risks

1.6.1 Comprehensive Risk Identification: An effective national AML/CFT/CPF framework begins with the systematic identification and understanding of risks. To this end, competent authorities shall conduct regular National Risk Assessments (NRAs) as the cornerstone for policy formulation and implementation. These assessments should provide a comprehensive evaluation of vulnerabilities across the financial and non-financial sectors, with particular attention to cross-border transactions and informal economic activities that may serve as conduits for illicit financial flows.

The NRAs shall be data-driven and evidence-based. Authorities are encouraged to utilise information derived from diverse sources including Suspicious Transaction Reports (STRs), law enforcement investigations, supervisory findings, and intelligence assessments, to identify and map emerging trends in ML, TF, and PF. By integrating these datasets, the national coordination mechanism can build a holistic picture of systemic threats, evolving typologies, and sectoral exposure levels.

The findings from the NRAs should form the analytical foundation for national AML/CFT/CPF strategies, ensuring that all subsequent policies and operational responses are risk-informed, proportionate, and responsive to the evolving financial crime landscape.

1.6.2 Risk Mitigation Strategies: Building upon the outcomes of the NRAs, competent authorities shall design and implement targeted mitigation measures aimed at addressing the specific vulnerabilities identified. This involves the adoption of tailored regulatory reforms, the strengthening of enforcement mechanisms, and the development of sector-specific guidelines to address gaps in compliance and supervision.

Risk mitigation should also emphasise the effective dissemination of NRA results to relevant stakeholders including government agencies, financial institutions, DNFBPs, and civil society to promote collective understanding of national risk exposure and encourage sectoral ownership of mitigation efforts. Transparent communication of findings helps foster a culture of compliance and supports alignment between the public and private sectors.

Furthermore, resource allocation shall be strategically guided by the outcomes of the risk assessment process. Authorities are expected to channel financial, human, and technical resources proportionately to high-risk sectors such as cross-border trade, real estate, and Virtual Asset Service Providers (VASPs). Prioritising these areas ensures that the national response remains focused, efficient, and commensurate with the country's threat profile.

1.6.3 Monitoring and Evaluation: The dynamic nature of financial crime requires continuous monitoring and adjustment of policies and strategies. IMCs/NCCs shall develop robust mechanisms for evaluating the effectiveness of implemented risk mitigation measures. This includes the establishment of performance indicators, periodic reviews, and feedback loops to assess progress in reducing exposure to ML/TF/PF risks.

Policies and strategic frameworks must be regularly updated to reflect the evolving threat environment, emerging typologies, and shifts in international AML/CFT/CPF standards. Updates should ensure alignment with the latest FATF Recommendations and GIABA regional guidance.

Through sustained monitoring, evaluation, and recalibration, member states can maintain a proactive and adaptive national AML/CFT/CPF posture, one that continuously strengthens system resilience, enhances coordination, and ensures lasting compliance with global standards.

1.7 Coordinating National Policies in Alignment with FATF Recommendations 1 and 2

1.7.1 Implementation of FATF Standards: National AML/CFT/CPF frameworks should align fully with FATF Recommendations 1 and 2 to ensure a coordinated and risk-based approach to combating ML, TF, and PF. Competent authorities shall design and implement policies that integrate the risk-based approach across financial institutions, DNFBPs, and other sectors.

IMCs/NCCs should oversee the harmonisation of strategies and supervisory practices to ensure consistency with NRA findings, FATF requirements, and GIABA guidance. This coordination strengthens national coherence and promotes efficient resource allocation based on risk levels.

1.7.2 Strategic Policy Development: Member states should formulate integrated AML/CFT/CPF strategies informed by NRAs, deficiencies identified in MERs, and international guidance. These strategies must define clear objectives and actions that address identified risks and reinforce institutional coordination.

Sectoral action plans should be incorporated into a unified national strategy to avoid duplication and ensure policy coherence. Regular reviews should be conducted to align policies with evolving threats and international standards.

1.7.3 Stakeholder Engagement: The effectiveness of AML/CFT/CPF efforts depends on broad stakeholder involvement. IMCs/NCCs should engage relevant ministries, regulators, law enforcement, private sector actors, and civil society in developing and implementing policies.

Public-private partnerships and regular consultations will enhance understanding, improve compliance, and foster a collective commitment to national AML/CFT/CPF objectives.

1.8 Ensuring Effective Interagency Collaboration, Resource Allocation, and International Compliance

1.8.1 Coordination Mechanism: IMCs/NCCs serve as the central platform for coordinating national AML/CFT/CPF activities. They facilitate collaboration among government agencies, including FIUs, regulators, law enforcement, and intelligence bodies, to ensure coherent and timely responses to ML/TF/PF threats.

Clear protocols for communication and information sharing should be developed to promote efficiency, avoid duplication, and ensure that intelligence and operational actions are well-coordinated across all relevant institutions.

1.8.2 Resource Optimisation: Sustained AML/CFT/CPF effectiveness depends on adequate financial, technical, and human resources. IMCs/NCCs should advocate for sufficient national budgetary allocations and promote efficient resource utilisation across agencies.

They should also leverage external technical assistance from GIABA and other international partners to strengthen institutional capacity, access specialised expertise, and enhance operational performance.

1.8.3 International Compliance and Reporting: As a key AML/CFT/CPF body, IMCs/NCCs should coordinate with the FIU ensure timely submission of mutual evaluation reports, follow-up updates, and other compliance documentation.

They must also promote adherence to United Nations Security Council Resolutions (UNSCRs) concerning targeted financial sanctions and measures to counter proliferation financing, ensuring alignment with global obligations.

1.8.4 Capacity Building and Training: Continuous capacity development is essential for maintaining operational effectiveness. IMCs/NCCs should organise regular training programs for member agencies to strengthen technical knowledge, analytical capacity, and interagency coordination.

They should also facilitate the dissemination of best practices and lessons learned from regional and international partners, promoting continuous improvement and alignment with evolving AML/CFT/CPF standards.

2

LEGAL AND INSTITUTIONAL FRAMEWORK

The legal and institutional framework of IMCs/NCCs forms the basis for their legitimacy, authority, and sustained effectiveness in coordinating national AML/CFT/CPF efforts. A clearly defined legal foundation ensures that these committees operate with transparency, consistency, and resilience against political or institutional changes.

2.1 Establishment

2.1.1 Legal Instruments: IMCs/NCCs should be formally established through binding legal instruments such as presidential decrees, ministerial directives, or parliamentary enactments. This legal foundation confers authority and protection, ensuring operational continuity and institutional sustainability.

2.1.2 Alignment with International Standards: The establishment process must reflect national commitments to international obligations, including FATF Recommendations 1 and 2, and regional requirements under GIABA. Legal frameworks should explicitly reference FATF Standards, and relevant strategic recommendations, embedding these principles into national policies and regulations.

2.1.3 Clarification of Scope: The legal instrument establishing the IMC/NCC should clearly define its scope, mandate, and jurisdiction to prevent overlap with other coordinating bodies. It should also specify mechanisms for cooperation with domestic institutions and international partners, ensuring coherence in the implementation of AML/CFT/CPF measures.

2.2 Mandate

The mandate of IMCs/NCCs establishes their core responsibilities and provides the framework for evaluating their performance and effectiveness in coordinating national AML/CFT/CPF activities.

2.2.1 Policy Oversight and Implementation: IMCs/NCCs are responsible for overseeing the development and implementation of national AML/CFT/CPF strategies. They ensure that these strategies are risk-based, aligned with FATF standards, and responsive to the outcomes of NRAs and MERs.

2.2.2 Interagency Cooperation and Coordination: The committees serve as the primary mechanism for promoting collaboration among government agencies, regulators, law enforcement, and the private sector. They are tasked with developing and enforcing protocols for information sharing and joint operational action, reducing duplication and enhancing collective impact.

2.2.3 Monitoring and Reporting: IMCs/NCCs must regularly review the effectiveness of national AML/CFT/CPF measures, identify implementation gaps, and propose corrective actions. They are responsible for preparing and submitting progress reports to national authorities and other relevant bodies, ensuring accountability and transparency in national efforts.

2.2.4 Legal Reforms and Advocacy: The committees should advise the government on necessary legislative and regulatory reforms to address emerging ML/TF/PF threats, close compliance gaps, and strengthen national alignment with evolving international standards.

2.3 Membership

The composition of IMCs/NCCs is critical to ensuring balanced representation, access to expertise, and effective decision-making in national AML/CFT/CPF coordination.

2.3.1 Core Members: Membership should include key government ministries and institutions responsible for financial regulation, justice, security, and policy oversight. Core members typically include the Ministries of Finance, Justice, and Interior/Security; the Central Bank; Securities and Exchange Commission; the FIU; and relevant law enforcement and intelligence agencies. Each member institution should designate a representative with sufficient authority to make decisions and contribute to interagency coordination.

2.3.2 Advisory Members: To enhance inclusiveness and expertise, IMCs/NCCs may co-opt representatives from the private sector, judiciary, Public Accounts Committees, and civil society organisations. These members provide insights on sectoral vulnerabilities, promote transparency, and support legislative and public engagement processes.

2.3.3 Inclusion of Sectoral Expertise: Where relevant, representatives from high-risk sectors such as real estate, virtual assets, gambling, and non-profit organisations (NPOs) should be included or consulted periodically. Their participation strengthens the committee's understanding of industry-specific risks and enhances the design of targeted policies.

2.3.4 Governance Structure: The IMC/NCC should be chaired by a senior government official, typically the Minister or Permanent Secretary of Finance, Interior or Justice to ensure strategic leadership and political support. A dedicated secretariat should manage daily operations, organise meetings, and maintain documentation to ensure continuity and institutional efficiency.

2.4 Institutional Interactions

Effective coordination between IMCs/NCCs and other national and international entities is essential for the coherent implementation of AML/CFT/CPF measures.

2.4.1 National-Level Interactions: IMCs/NCCs should collaborate closely with national legislative, judicial, and executive bodies to ensure that AML/CFT/CPF strategies align with existing laws and policy priorities. Coordination with other national committees or task forces addressing financial or organised crime is vital to avoid duplication of efforts and promote unified national action.

2.4.2 Regional and International Cooperation: The committees should actively engage with GIABA and where necessary with FATF, and other international partners to strengthen compliance, share experiences, and access technical assistance. Participation in regional workshops, training sessions, and mutual evaluations enhances capacity and reinforces alignment with international standards.

2.4.3 Capacity Development: IMCs/NCCs should organise regular training and knowledge-sharing sessions for members and partner institutions. These initiatives should focus on improving understanding of the FATF requirements, GIABA processes, and emerging ML/TF/PF risks, thereby ensuring that all participating agencies maintain the technical expertise necessary for effective implementation.

2.5 Committee Structure

The structure of IMCs/NCCs is designed to ensure effective governance, clear accountability, and efficient coordination of national AML/CFT/CPF activities. Each component of the structure performs a specific role in achieving the committee's objectives.

2.5.1 Chairperson: The Chairperson provides strategic leadership and direction, ensuring that committee activities align with national priorities, FATF Recommendations, and GIABA guidance. This role involves overseeing policy implementation, facilitating interagency cooperation, and representing the committee in high-level national and international engagements. The Chairperson is typically a senior official such as a Minister or Permanent Secretary, who possesses authority, experience, and understanding of AML/CFT/CPF dynamics.

2.5.2 Secretariat: The Secretariat serves as the administrative and operational hub of the IMC/NCC. It manages meetings, prepares agendas, records decisions, maintains documentation, and monitors implementation of committee resolutions. The Secretariat also coordinates with member institutions and international partners, ensuring timely information exchange and progress reporting. It should be staffed by qualified professionals with expertise in AML/CFT/CPF, policy analysis, and public administration.

2.5.3 Sub-Committees: Specialised sub-committees may be established to address specific thematic areas such as risk assessment, policy development, international cooperation, and capacity building. These sub-committees allow for focused technical engagement and ensure that complex issues are effectively managed. Each sub-committee reports periodically to the IMC/NCC general body, presenting updates on activities, challenges, and recommendations.

2.5.4 Accountability and Flexibility: Sub-committees and the Secretariat operate under the oversight of the IMC/NCC, ensuring coordination and adherence to agreed strategies. The structure should remain flexible to adapt to emerging threats, new regulatory developments, or evolving institutional needs.

2.6 Key Functions

The IMCs/NCCs perform core functions that support national coordination, policy formulation, and continuous improvement of AML/CFT/CPF systems. These functions ensure that responses to ML/TF/PF risks are strategic, evidence-based, and aligned with international standards.

a. Risk Assessment

i. **Conduct and Periodically Update NRAs**: IMCs/NCCs should lead the development and regular updating of NRAs to identify and assess ML/TF/PF risks within the country. Updates should capture emerging threats and evolving financial crime trends, including the misuse of technology in financial systems.

ii. **Encourage the identification of sectoral Risks**: The IMCs/NCCs should encourage and where possible coordinate the identification of sectoral risks such as real estate, cash-based businesses, cross-border trade, and financial services.

b. Policy Development

i. **Develop and Implement National Strategies**: IMCs/NCCs oversee the design and implementation of national AML/CFT/CPF strategies that address specific risks and vulnerabilities. Strategies must be inclusive, covering financial institutions, DNFBPs, NPOs, and emerging technologies such as virtual assets. Actions should be prioritised based on identified risk levels and resource availability.

ii. **Integrate Findings from NRAs into Policy**: NRA findings should guide the formulation of targeted policies that mitigate sector-specific risks, including those linked to informal cash economies, cross-border financial flows, and virtual asset services.

c. Coordination and Collaboration

i. **Facilitate Communication Between Agencies**: The IMCs/NCCs act as the main platform for interagency dialogue, promoting timely and efficient information exchange among FIUs, regulators, law enforcement, and intelligence agencies. Standardised communication protocols should be established to improve coordination and clarity.

ii. **Address Operational Overlaps and Gaps**: Committees should identify duplications or gaps in institutional mandates and promote cooperation to ensure cohesive national responses to ML/TF/PF risks.

iii. **Resolve Conflicts Within Mandates**: IMCs/NCCs may serve as arbitrators to resolve interagency disputes or inefficiencies, ensuring alignment with national strategies and international standards.

d. Self/Mock Evaluations

i. **Coordinate Self-Evaluations**: Committees should organise national self-assessments to evaluate implementation progress, identify strengths and weaknesses, and prepare for international evaluations.

ii. **Prepare for and Oversee Mutual Evaluations**: IMCs/NCCs coordinate all preparatory activities for mutual evaluations, ensuring stakeholder participation, timely data submission, and structured follow-up on recommendations.

e. Capacity Building

i. **Training for Members**: Regular training programs should be conducted to enhance understanding of FATF standards, emerging threats, and international compliance obligations. Sector-specific training should target law enforcement, financial regulators, and private sector stakeholders.

ii. **Continuous Development**: Committees should promote the development of specialised skills such as forensic financial analysis, virtual asset monitoring, and cross-border investigations to improve national AML/CFT/CPF capabilities.

f. International Cooperation

i. **Facilitate Collaboration with International Bodies**: IMCs/NCCs should participate actively in regional and international forums, including GIABA workshops and conferences, to share experiences and adopt best practices.

ii. **Cross-Border Collaboration**: Committees should support cross-border investigations and intelligence sharing, fostering bilateral and multilateral partnerships to address transnational financial crimes and regional ML/TF/PF threats.

g. Monitoring and Reporting

i. **Track Progress on Recommendations**: IMCs/NCCs should establish mechanisms to monitor implementation of recommendations from mutual evaluations, identifying and addressing bottlenecks to improve compliance with FATF standards.

ii. **Submit Reports to GIABA and Other Bodies**: Comprehensive annual reports should be prepared and submitted to the Executive, reflecting progress, updated NRAs, and key policy developments. These reports may also be shared with GIABA and other relevant bodies.

iii. **Evaluation Metrics**: Committees should assess their performance using clear indicators such as the effectiveness of mitigation measures, interagency collaboration, and adherence to international benchmarks.

3

OPERATIONAL GUIDELINES

The operational guidelines provide a standardised framework to ensure the effective and transparent functioning of IMCs/NCCs. They outline key procedures for meetings, decision-making, documentation, and evaluation, enabling committees to coordinate and oversee AML/CFT/CPF activities efficiently.

a. Meeting Frequency

i. Quarterly Meetings: IMCs/NCCs should convene at least quarterly to review progress, evaluate ongoing measures, and update strategies in line with national and international priorities. Regular meetings facilitate information sharing, coordination, and the timely identification of emerging ML/TF/PF threats.

ii. **Emergency Sessions**: Emergency meetings may be held as required to address urgent issues such as new threats, mutual evaluation findings, or critical interagency cases. The Chairperson or a majority of members may convey these to ensure rapid response and flexibility.

iii. **Meeting Agenda**: Agendas should be distributed at least one week before regular meetings and as early as possible for emergency sessions. Priority topics should include implementation progress, mutual evaluation recommendations, policy updates, and new risk assessment findings.

b. Decision-Making

i. **Consensus-Based Approach**: Decisions should primarily be reached through consensus to promote ownership, cooperation, and accountability among member institutions.

ii. **Voting Mechanism for Critical Issues**: Where consensus cannot be achieved, a formal voting process should be applied. Voting rules such as simple or two-thirds majority must be clearly defined in the committee's terms of reference.

iii. **Conflict Resolution**: The Chairperson should facilitate mediation to resolve disagreements and ensure decisions align with the committee's objectives. Where necessary, unresolved disputes may be escalated to higher authorities or resolved through an agreed appeals process.

c. Documentation

i. **Meeting Records**: Minutes should be recorded for every meeting, capturing attendance, deliberations, decisions, and action points with assigned responsibilities and deadlines.

ii. **Decision Logs**: A log of key decisions should be maintained, indicating rationale, expected outcomes, and responsible parties to support transparency and accountability.

iii. **Central Repository**: A secure central repository should be established to store all official documents, including meeting records, policies, and reports. Access to sensitive information should be restricted to authorised personnel.

iv. **Annual Reports**: IMCs/NCCs should prepare annual reports summarising key activities, achievements, challenges, and forward plans. Reports should be submitted to national authorities, and may be shared with GIABA, and other relevant partners.

d. Evaluation Metrics

i. **Effectiveness Indicators**: Performance should be measured through indicators such as interagency collaboration, policy implementation, and operational efficiency. These indicators assess the timeliness, quality, and impact of AML/CFT/CPF actions.

ii. **Progress on Mutual Evaluation Recommendations**: Committees should monitor implementation of recommendations using structured tracking tools or dashboards to highlight progress and remaining gaps.

iii. **Risk Management**: Periodic evaluations should assess the impact of mitigation measures on high-risk sectors, including cross-border trade, informal economies, and virtual assets.

iv. **Stakeholder Engagement**: Effectiveness should also be gauged through stakeholder participation, including input from DNFBPs, private sector actors, and civil society organisations.

v. **Periodic Reviews**: Self-assessments and external peer reviews should be conducted periodically to identify operational improvements and ensure objective evaluation.

4

INTEGRATION WITH REGIONAL FRAMEWORKS

Integration with regional frameworks is a central function of the IMCs/NCCs and ensures that national AML/CFT/CPF systems align with both regional and international standards. Effective engagement strengthens compliance, promotes cooperation, and enhances collective resilience against financial crimes within and beyond the region.

i. **Collaboration with GIABA:** The IMCs/NCCs serve as the primary national coordination platform for collaboration in member states. The IMCs through the Chairperson and members collaborate with GIABA through participation in Technical Committees and Plenary meetings.

ii. **Participation in Regional Workshops and Evaluations**: IMCs/NCCs should maintain active participation in GIABA-led initiatives, including workshops, seminars, and training programs, to improve national technical capacity and understanding of FATF standards. Member representation must be ensured during regional forums where emerging ML/TF/PF risks, typologies, and strategic priorities are discussed. Committees should also contribute to GIABA's mutual evaluation processes by providing accurate and timely data, reports, and contextual analysis to support objective assessments of national systems.

iii. **Alignment with Mutual Evaluation and Other Recommendations**: Committees must collaborate with GIABA to review and implement recommendations arising from mutual evaluations, typology reports, and strategic reviews. These findings should be integrated into national AML/CFT/CPF strategies and action plans. IMCs/NCCs should also ensure that national priorities are consistent with GIABA's regional agenda particularly in areas such as cross-border illicit financial flows, vulnerabilities in informal economies, and proliferation financing risks. Guidance and technical assistance provided by GIABA should be incorporated into operational and policy frameworks to improve overall system effectiveness.

iv. **Regional Cooperation**: IMCs/NCCs should promote joint operations and investigations with other GIABA member states to address transnational ML/TF/PF threats. Cooperation should extend to the development of standardised regional frameworks for intelligence sharing, mutual legal assistance, and regulatory alignment. Establishing consistent reporting and communication channels strengthens regional coordination and facilitates the timely exchange of strategic and operational information.

4.1 International Reporting

Maintaining accountability and transparency requires IMCs/NCCs to establish structured mechanisms for reporting progress and sharing information with regional and international partners.

i. **Preparation of Activity Reports**: IMCs/NCCs should prepare periodic activity reports detailing progress in the AML/CFT/CPF frameworks of member states and challenges encountered. These reports should use standardised templates and formats provided by GIABA to ensure clarity and comparability. Each report should highlight reforms in laws, regulations, and institutional frameworks, and measurable improvements in outcomes such as STR reporting, enforcement, and asset recovery among others.

ii. **Sharing Best Practices and Challenges in Regional Forums**: IMCs/NCCs should actively contribute to GIABA's regional knowledge-sharing platforms by presenting case studies, innovations, and successful approaches to AML/CFT/CPF implementation. They should also share lessons learned and challenges encountered during risk assessments, policy formulation, and evaluation exercises to promote mutual learning among member states. Incorporating lessons from peer experiences will support the continuous strengthening of national AML/CFT/CPF frameworks.

iii. **Engagement with Other Regional Bodies**: Beyond GIABA, IMCs/NCCs should collaborate with other regional and continental institutions such as ECOWAS and the African Union to address the broader socio-economic and security drivers of ML/TF/PF risks. Participation in joint initiatives including those targeting cross-border terrorism financing, smuggling, and illicit trade supports a comprehensive and harmonised approach to combating financial crimes across Africa.

4.2 Key Benefits of Regional Integration

Effective regional integration under the GIABA framework strengthens national AML/CFT/CPF systems by promoting coordination, shared expertise, and collective accountability. It allows member states to leverage regional strengths to address transnational threats, enhance compliance, and build sustainable capacity across West Africa.

i. **Enhanced Regional Cohesion:** Collaboration with GIABA promotes a unified and coordinated regional approach to combating ML/TF/PF threats. This integration ensures that national efforts complement one another, promoting synergy in policy development, supervision, and enforcement. A cohesive regional response enhances collective resilience and minimises regulatory or operational gaps that criminals could exploit.

ii. **Access to Technical Expertise and Resources:** Active participation in GIABA activities provides member states with access to specialised training, technical assistance, and financial support. These resources strengthen institutional capacity, improve understanding of international best practices, and support the implementation of effective AML/CFT/CPF measures.

iii. **Improved International Standing:** Effective engagement with GIABA enhances a country's reputation for compliance with FATF standards and adherence to global best practices. This improved standing boosts investor confidence, facilitates cross-border financial flows, and reduces exposure to sanctions, de-risking, or potential blacklisting by international financial institutions.

iv. **Knowledge and Skills Transfer:** Regional meetings and peer-review exercises offer valuable opportunities for experience sharing and adoption of innovative practices. Through these exchanges, countries can learn from one another's successes and challenges, adapting proven solutions to their own national contexts while strengthening the collective knowledge base within the region.

v. **Operational Efficiency:** Joint activities and coordinated initiatives with GIABA and other regional bodies enable more efficient use of resources. Shared access to data, intelligence, and analytical tools improves the speed and quality of decision-making. This collaboration reduces duplication of efforts, ensures harmonised reporting, and strengthens both preventive and enforcement measures across member states.

4.3 Public-Private Partnerships (PPPs) in AML/CFT/CPF

- **Overview:** PPPs offer a transformative approach to combating financial crime by fostering collaboration between public authorities (e.g., FIUs, regulators, LEAs) and private sector entities (e.g., banks, DNFBPs, fintech companies). These partnerships move beyond compliance to enable two-way intelligence sharing, collaborative investigations, and coordinated policy development.

- **Key Principles:** PPPs are built on Coordination, Cooperation, and Collaboration - ensuring shared ownership of outcomes and mutual benefit in addressing money laundering, terrorist financing, and proliferation financing threats.

- **Strategic Relevance:** PPPs help bridge intelligence gaps, enhance the implementation of the risk-based approach (FATF Rec. 1), improve coordination (Rec. 2), and support effective financial intelligence and feedback mechanisms (Recs. 29 & 34). They contribute directly to FATF Immediate Outcomes 1, 4, 6, 7, and 9.

a. Core Objectives: The following core objectives are necessary for a successful and effective PPP implementation.

- **Intelligence Sharing:** Enable secure and timely exchange of typologies, red flags, and case-specific data.

- **Risk Understanding:** Support accurate risk calibration and control measures.

- **Policy Development:** Promote private sector input into NRAs and guidance formulation.

- **Enhanced Detection:** Facilitate early detection of cross-border and complex financial crimes.

- **Innovation and Capacity Building:** Leverage private sector technology (e.g., AI, blockchain) and foster joint training.

b. Implementation Models: GIABA member states may adopt flexible PPP structures:

i. **National Forums:** Quarterly policy and strategy discussions.

ii. **Thematic Groups:** Focus on high-risk areas (e.g., VAs, TBML).

iii. **Fusion Centres:** Joint analysis teams with co-located personnel.

iv. **Digital Platforms:** Secure online collaboration for dispersed stakeholders.

v. **Hybrid Models:** Combining strategic and operational elements.

c. Priority Areas for PPP Focus in GIABA States: The following areas have been identified as priority areas for GIABA member states. These are identified based on the deficiencies identified in Mutual Evaluation Reports, National and Sectoral Risk Assessments, changes to the FATF standards and the regional peculiarities. They include Beneficial ownership transparency; STR quality enhancement; Informal sector risk management; Regulation of virtual assets; Cross-border remittance monitoring; DNFBP compliance; NPO risk mitigation; TBML detection; Illicit flows in extractive industries and Disruption of terrorist financing.

d. Enabling Conditions: To ensure success, the following conditions are crucial.

- **i.** Legal frameworks ensuring safe harbour for shared intelligence
- **ii.** Trust-building measures and cultural change
- **iii.** Investment in secure IT infrastructure
- **iv.** Political will and sustainable funding
- **v.** Continuous performance evaluation and feedback mechanisms

e. Monitoring Success: PPPs should be assessed based on participation rates, intelligence outcomes, joint investigations, and contribution to improved FATF ratings (e.g., IO.6). Evaluation mechanisms must ensure adaptability and continuous improvement.

f. GIABA's Role: GIABA will serve as a regional facilitator, providing guidance, forums, technical support, and harmonised standards to support PPPs across member states.

5

CHALLENGES AND MITIGATION STRATEGIES

The effective performance of IMCs/NCCs depends on their ability to anticipate and address operational, structural, and contextual challenges that may affect their efficiency and impact. Identifying these obstacles early and implementing targeted solutions strengthens the committees' capacity to fulfil national AML/CFT/CPF objectives in line with international standards.

5.1 Resource Constraints

IMCs/NCCs often operate in environments where funding and resources are limited. Inadequate budget allocations can delay critical operations, hinder the implementation of national strategies, and limit the ability to invest in advanced analytical tools or technologies. Competing national priorities such as healthcare, education, or infrastructure may further reduce attention to AML/CFT/CPF activities, affecting sustainability and long-term planning.

Mitigation Strategies: To overcome resource constraints, committees should adopt a dual approach combining domestic advocacy with external support:

- **Advocate for dedicated funding:** Engage with ministries of finance and planning to secure budgetary allocations for AML/CFT/CPF initiatives, emphasising their contribution to economic stability and compliance with international obligations. Data, case studies, and cost-benefit analyses should be used to demonstrate the financial and reputational risks of underfunding national frameworks.

- **Seek technical assistance and partnerships:** Collaborate with GIABA and international partners to access financial support, training, and specialised technical expertise. Leverage donor-funded programs and regional development projects to bridge resource gaps and strengthen institutional capacity.

5.2 Capacity Gaps

Limited technical expertise remains a common obstacle in AML/CFT/CPF implementation. A shortage of trained personnel constrains the ability of committees to conduct NRAs, coordinate policy, and monitor compliance effectively. Frequent staff turnover also weakens institutional memory and continuity, resulting in inconsistent follow-up on strategic decisions.

Mitigation Strategies: Capacity development should be treated as a continuous and adaptive process:

- **Regular training programs:** Conduct periodic training to enhance members' understanding of FATF standards, risk-based approaches, and emerging threats such as misuse of virtual assets or NPOs. Tailor sessions to the specific needs of stakeholders including regulators, LEAs, and financial institutions.

- **Exchange and peer learning initiatives:** Establish study tours, secondments, and peer-to-peer sessions with other GIABA member states. Participation in GIABA workshops and regional conferences allows IMCs/NCCs to share experiences, adopt innovative solutions, and strengthen technical expertise.

- **Institutional knowledge management:** Create structured knowledge-retention mechanisms such as documentation repositories, standard handover templates, and mentorship programs to preserve institutional memory and mitigate disruptions caused by staff transitions.

5.3 Coordination Challenges

Effective coordination remains one of the most complex aspects of national AML/CFT/CPF frameworks. Fragmented communication among agencies can cause duplication of effort, slow responses to emerging risks, and weaken interagency cooperation. Overlapping mandates and jurisdictional boundaries can also create friction, while geographical constraints may complicate coordination in larger or less-connected countries.

Mitigation Strategies: Practical coordination mechanisms can strengthen collaboration and streamline communication:

- **Use of technology:** Deploy secure digital platforms and shared databases for real-time data exchange among key agencies. Virtual meeting tools can help overcome geographical limitations, while centralised case-management systems allow the tracking of joint investigations and interagency initiatives.

- **Standardised protocols:** Develop formal communication and information-sharing frameworks, including clear rules for conflict resolution and coordination. Assign a lead agency or national coordinator responsible for managing interagency issues and ensuring alignment with the national strategy.

- **Periodic joint activities:** Conduct regular joint meetings, interagency workshops, and simulation exercises to foster collaboration and mutual trust. Joint operations or investigations should be encouraged to strengthen operational synergy and promote unified responses to ML/TF/PF threats.

5.4 Institutional Memory

Frequent staff rotations and leadership transitions can disrupt operational continuity and slow progress on strategic AML/CFT/CPF initiatives. The absence of well-documented procedures or comprehensive archives often leads to inefficiencies, knowledge loss, and inconsistent implementation of national objectives.

Mitigation through Institutional Memory: To safeguard institutional continuity, IMCs/NCCs should institutionalise robust knowledge management systems:

- **Comprehensive handover documentation:** Develop detailed handover notes outlining ongoing projects, key responsibilities, and the status of major initiatives. These should include procedural guidance, contact lists, and critical deadlines to ensure seamless leadership and staff transitions.

- **Centralised archiving systems:** Establish a secure digital repository to store essential records, including meeting minutes, policies, strategies, and evaluation reports. Properly categorising and granting controlled access to these archives ensures institutional transparency and operational efficiency.

- **Knowledge transfer mechanisms:** Implement mentorship and succession programs whereby departing members train successors, preserving institutional expertise and ensuring that the committee retains technical competence across cycles of leadership and membership.

5.5 Performance Reviews

Without structured monitoring and evaluation, inefficiencies may go undetected and adaptation to emerging risks may be delayed. Inadequate accountability mechanisms can lead to stagnation or poor implementation of AML/CFT/CPF strategies.

Mitigation through Performance Reviews: Regular performance reviews enable IMCs/NCCs to assess effectiveness, identify gaps, and refine operations:

- **Annual evaluations:** Conduct annual reviews to assess the committee's performance using measurable indicators such as the frequency and quality of interagency collaboration, progress on mutual evaluation recommendations, and tangible risk mitigation outcomes.
- **Feedback loops:** Integrate structured feedback from financial institutions, DNFBPs, LEAs, regulators, and civil society organisations. Insights from these stakeholders help refine strategies and promote inclusive policymaking.
- **Refinement of strategies:** Use findings from performance reviews to adjust policies, streamline procedures, and align operations with emerging ML/TF/PF risks.
- **Reporting and transparency:** Summarise and publish key findings from evaluations to demonstrate accountability to national authorities, GIABA, and other stakeholders, reinforcing public trust and institutional credibility.

5.6 Community Engagement:

Limited understanding of AML/CFT/CPF measures among private-sector actors and civil society can cause weak compliance and resistance to reforms. Additionally, informal and underserved communities often lack awareness of how AML/CFT/CPF frameworks contribute to broader economic stability and security.

Mitigation through Community Engagement: Sustained community engagement builds inclusivity and promotes shared ownership of AML/CFT/CPF objectives:

- **Awareness campaigns:** Organise national awareness initiatives to highlight the significance of AML/CFT/CPF measures in safeguarding economic growth and national security. Use diverse communication channels, media, workshops, and digital platforms to reach a wide audience.
- **Private sector partnerships:** Collaborate with financial institutions, DNFBPs, and industry associations to promote compliance and disseminate sector-specific guidance. Tailored training programs should address practical obligations, risk management, and reporting requirements.
- **Civil society involvement:** Work with CSOs to promote transparency, accountability, and public confidence in AML/CFT/CPF efforts. Encourage CSO participation in outreach to vulnerable and informal sector groups to improve understanding and voluntary compliance.
- **Feedback mechanisms:** Create interactive platforms such as roundtables, surveys, and online portals that allow stakeholders to provide input, share challenges, and recommend improvements. Such mechanisms foster dialogue, responsiveness, and mutual accountability.

5.7 Additional Cross-Cutting Challenges

- **Political Will**: A lack of sustained high-level political commitment can delay reforms, weaken enforcement, and undermine strategic coordination. To mitigate this, IMCs/NCCs should engage senior policy-makers through evidence-based advocacy, demonstrating the link between AML/CFT/CPF measures and broader national priorities such as economic growth, financial stability, and national security. Political champions should be identified to sustain visibility and momentum at cabinet and parliamentary levels.

- **Public Awareness and Engagement**: Low levels of awareness among the public and private sectors may cause poor compliance, particularly in informal and high-risk sectors. IMCs/NCCs should lead public education initiatives and outreach campaigns in partnership with civil society, professional associations, and the media. Messaging should emphasise the importance of compliance, the consequences of ML/TF/PF, and the role of every stakeholder in safeguarding the financial system.

5.8 Summary

By addressing these challenges systematically, IMCs/NCCs can build resilient structures capable of sustaining effective AML/CFT/CPF coordination. Strengthening resources, expertise, communication, and engagement ensures long-term institutional stability and positions national systems to meet evolving global standards.

6

EMERGING RISKS IN AML/CFT/CPF

The evolving landscape of financial systems and global trade introduces new risks that require proactive measures. These include among others, the growing use of virtual assets and the complexities of cross-border financial activities, which present unique challenges to AML/CFT/CPF efforts. Addressing these risks requires a combination of regulatory frameworks, monitoring mechanisms, and international cooperation.

Virtual Assets and Digital Currencies

The proliferation of VAs has transformed the global financial landscape by enabling faster and borderless transactions. However, their pseudonymous nature and decentralised infrastructure have made them attractive to criminals seeking to launder funds, finance terrorism, or evade sanctions.

Challenges

- **Anonymity:** Virtual assets enable pseudonymous transactions that obscure the identities of transacting parties, complicating efforts to trace illicit activities or establish beneficial ownership.
- **Decentralisation:** Transactions occur on decentralised blockchain networks that operate independently of traditional financial institutions and regulatory authorities, limiting the reach of conventional oversight mechanisms.
- **Regulatory gaps:** Many jurisdictions lack comprehensive legislation or supervisory frameworks to regulate Virtual Asset Service Providers (VASPs), leaving systemic vulnerabilities that can be exploited by illicit actors.

Recommendations

- **Regulation of VASPs:** Require all VASPs to register with competent authorities and follow established AML/CFT obligations, including Customer Due Diligence (CDD), transaction monitoring, and Suspicious Transaction Report (STR) filing. Licensing regimes should be aligned with FATF Recommendation 15 and relevant guidance to ensure consistent compliance and accountability.
- **Transaction monitoring:** Mandate the use of blockchain analytics tools for real-time tracking of cryptocurrency transactions. National authorities should partner with reputable blockchain-analysis firms to enhance monitoring, identify typologies, and conduct forensic investigations of suspicious activity.
- **Education and awareness:** Provide specialised training for regulators, FIUs, LEAs, and financial institutions on detecting and mitigating VA-related risks. IMC/NCC members should regularly update their knowledge on emerging VA trends, typologies, and mitigation measures.
- **Collaboration:** Strengthen cross-border cooperation and information sharing among regulators, FIUs, and law enforcement agencies to trace and disrupt illicit activities involving cryptocurrencies. Engage with international partners to ensure consistent application of AML/CFT standards across jurisdictions.

- **Legislation:** Develop and enforce laws to govern peer-to-peer exchanges, decentralised finance (DeFi) platforms, and other emerging fintech models. Legal frameworks should include clear provisions on licensing, reporting obligations, and sanctions for non-compliance.

Cross-Border Risks

Cross-border trade and financial transactions remain key channels for illicit financial flows. The diversity of trade practices, jurisdictional inconsistencies and gaps in border management create opportunities for money launderers, terrorist financiers, and proliferation networks to exploit weaknesses in monitoring systems.

Challenges

- **Trade-Based Money Laundering (TBML):** Criminals misuse international trade mechanisms through over- or under-invoicing, false declarations, and misclassification of goods to disguise illicit funds and move value across borders undetected.
- **Illicit cash flows:** The physical movement of undeclared cash and value instruments across borders continues to fuel organised crime and terrorism financing, particularly in regions with limited cross-border reporting and enforcement capacity.
- **Weak border controls:** Inadequate infrastructure, insufficient technology, and limited staffing at entry and exit points enable smuggling, under-declaration, and unrecorded cross-border movements of goods and currency.
- **Complexity of international transactions:** The multiplicity of jurisdictions, intermediaries, and differing compliance standards complicates monitoring and impedes effective detection of suspicious activities.

Recommendations

- **Strengthen trade monitoring:** Integrate advanced data-analytics tools to detect anomalies in trade documentation and identify potential TBML indicators. Strengthen cooperation with customs authorities to track goods, reconcile trade data, and identify high-risk transactions.
- **Improve border-control mechanisms:** Equip border agencies with modern technologies such as scanners, automated risk-profiling systems, and secure data-exchange platforms. Provide targeted training to border officials on detecting smuggling techniques, cash-courier activity, and other illicit movements.
- **Harmonise regulations across jurisdictions:** Collaborate with regional and international bodies to align cross-border AML/CFT/CPF standards and establish mutual recognition of compliance frameworks. Harmonised regulations promote consistency and facilitate enforcement cooperation.
- **Public–private partnerships:** Engage trade finance institutions, logistics companies, and other private-sector actors in detecting and reporting suspicious trade transactions. Structured PPPs can enhance intelligence flow and reduce vulnerabilities in trade-finance operations.
- **Cross-border intelligence sharing:** Develop mechanisms for real-time exchange of intelligence and case information between national authorities. Participation in regional and international networks, such as GIABA and the Egmont Group, should be strengthened to improve FIU collaboration on cross-border cases.

6.1 Key Considerations for Addressing Emerging Risks

Effectively addressing emerging risks in the AML/CFT/CPF landscape requires forward-looking strategies that integrate technology, build institutional capacity, and promote cross-sectoral collaboration. IMCs/NCCs must ensure that evolving threats such as those posed by virtual assets and cross-border financial flows are continuously assessed and mitigated through adaptive, evidence-based approaches.

6.1.1 Technology as a Strategic Tool

Harnessing advanced technology is critical to identifying, monitoring, and disrupting illicit financial activities. Artificial intelligence (AI), machine learning, and blockchain analytics should be adopted to strengthen data-driven risk detection and enhance transparency in virtual asset and cross-border systems. Technology-based solutions can facilitate early warning mechanisms, improve transaction monitoring, and support intelligence-led investigations.

6.1.2 Capacity Building

Sustainable effectiveness depends on the technical and operational readiness of regulators, FIUs, LEAs, and border control agencies. Investment in capacity development should focus on training personnel in emerging technologies, digital forensics, trade-based money-laundering detection, and cross-border financial analysis. National and regional institutions should collaborate to ensure that technical expertise keeps pace with evolving typologies and technological innovation.

6.1.3 Stakeholder Collaboration

A whole-of-system approach is essential for managing emerging threats. Governments should strengthen partnerships with the private sector, including financial institutions, DNFBPs, and VASPs, and with international organisations and development partners. Regular multi-stakeholder dialogues and joint operations promote the sharing of intelligence, best practices, and resources to ensure a unified response to ML/TF/PF risks.

6.1.4 Continuous Risk Assessment

Emerging risks are dynamic and require constant evaluation. IMCs/NCCs should ensure that NRAs are regularly updated to capture developments in virtual assets, fintech innovations, and cross-border trade vulnerabilities. Updated NRAs enable policymakers to adapt regulatory frameworks, target high-risk sectors, and strengthen preventive measures.

6.2 Digital Tools for Collaboration in AML/CFT/CPF Frameworks

The integration of digital tools within national AML/CFT/CPF frameworks significantly enhances operational efficiency, transparency, and interagency coordination. These tools strengthen information management, intelligence sharing, and decision-making processes, enabling agencies to respond to financial crime threats with speed, precision, and security. The purpose of this section does not intend to designate the IMC/NCC as the body responsible for the development, management and utilisation of the tools discussed below along with the final products generated such as intelligence reports. Instead, it aims to provide the IMCs/NCCs with the role of promoting the utilisation of such tools by and among the respective competent authorities.

6.2.1 Secure Databases for Centralised Information Sharing

Purpose
Establish a centralised and secure digital platform that allows competent authorities to store, manage, and exchange critical operational data in real time.

Key Features

- Role-based access controls to restrict data access and editing rights to authorised users only.
- Comprehensive audit trails to record all user activity, enhancing accountability and data integrity.
- Encrypted data storage and transmission to protect sensitive financial intelligence.

6.2.2 Blockchain Technology for Financial Transaction Tracking

Purpose
Utilise blockchain's decentralised and tamper-proof ledger system to enhance traceability, integrity, and transparency in financial transactions.

Applications

- Facilitate transparent and auditable cross-border payments by providing time-stamped transaction records.
- Monitor cryptocurrency and virtual asset transactions to identify illicit financial flows and suspicious activity.

Benefits

- Cryptographic security and consensus validation mechanisms safeguard against data manipulation and unauthorised access.
- Real-time data sharing across agencies, maintaining both confidentiality and data authenticity.

6.2.3 Virtual Collaboration Platforms

Purpose

Enable remote interagency collaboration and coordination, particularly in geographically dispersed or resource-constrained environments.

Key Features

- Secure video conferencing, file sharing, and real-time communication tools.
- Integration with project management systems to monitor task assignments, deliverables, and deadlines.

Examples

- *Microsoft Teams for Government* and *Zoom for Government*: platforms with end-to-end encryption and compliance with international data protection standards.
- *Slack Enterprise Grid*: an enterprise-grade communication tool designed for secure interagency coordination and workflow tracking.

6.2.4 Artificial Intelligence (AI) and Data Analytics Tools

Purpose

Leverage AI and machine-learning technologies to analyse large, complex datasets and identify emerging ML/TF/PF risks.

Applications

- Use predictive analytics to allocate supervisory and investigative resources to high-risk areas.
- Apply entity-link analysis to detect hidden relationships between individuals, institutions, and transactions.

Examples

- *Palantir*: a data integration and analytics tool for financial intelligence and complex investigations.
- *SAS AML Solution* or similar platforms for automated risk scoring and anomaly detection.

6.2.5 Case Management Systems

Purpose

Streamline and centralise the coordination of investigations and compliance monitoring across multiple agencies.

Key Features

- Comprehensive document management, task tracking, and automated workflow tools.
- Real-time progress monitoring, reporting dashboards, and audit-ready documentation.

Examples

- *CaseWare AML Compliance Software*: tailored for financial crime investigations and regulatory audits.
- Custom-built platforms that integrate LEAs, FIUs, and regulators into a unified investigative framework.

6.2.6 Secure Data Transfer Protocols

Purpose

Ensure the safe and confidential exchange of sensitive data between domestic agencies and international partners.

Tools

- PGP (Pretty Good Privacy) encryption for secure email and document transmission.
- Secure File Transfer Protocol (SFTP) for large-scale data exchanges across networks.

Examples

- *Thales SafeNet* and equivalent encryption technologies designed for high-security environments in government and the financial sector.

6.2.7 Integrated Intelligence Platforms

Purpose

Provide a unified environment for collecting, analysing, and disseminating actionable financial intelligence.

Key Features

- Integration of data from STRs, OSINT, law enforcement databases, and regulatory reports.
- Geospatial and network analysis capabilities to map ML/TF/PF patterns and detect transnational linkages.

Examples

- *i2 Analyst's Notebook*: a visualisation tool for relationship and network analysis in large datasets.
- *AML Bridge*: an FIU-focused collaboration platform that supports cross-border information exchange and joint analytical projects.

6.3 Summary

Digital transformation represents a cornerstone of modern AML/CFT/CPF frameworks. By promoting the integration of these tools, IMCs/NCCs can enhance interagency communication, data accuracy, and investigative efficiency. A coordinated adoption strategy supported by adequate training, infrastructure, and cybersecurity safeguards will ensure that technology strengthens both national resilience and regional cooperation against financial crimes.

Implementation Considerations

Effective implementation of digital and institutional strategies within AML/CFT/CPF frameworks requires careful planning, continuous skill development, and robust governance structures. The successful adoption of new tools and approaches hinges on the capacity of personnel, the strength of legal safeguards, and the establishment of policies that balance innovation with accountability.

Training and Capacity Building

Agencies must invest in continuous training and professional development to ensure personnel can use digital tools effectively and adapt to technological advancements. Training should cover data analytics, blockchain monitoring, cybersecurity, and interagency collaboration platforms. Partnerships with technical experts, universities, and international organisations can strengthen capacity-building initiatives and ensure sustained knowledge transfer.

Legal and Policy Frameworks

The adoption of advanced technologies must be guided by comprehensive legal and policy frameworks that ensure accountability, protect privacy, and safeguard the confidentiality of sensitive information. Regulations should define data-handling procedures, establish standards for digital evidence management, and clarify the roles and responsibilities of agencies in using technology for AML/CFT/CPF operations.

7

SUSTAINABILITY

Sustainability is a cornerstone of effective AML/CFT/CPF implementation. It ensures that IMCs/NCCs can maintain operational efficiency, adapt to emerging threats, and deliver long-term results. A deliberate focus on sustainability includes strategic resource mobilisation, consistent stakeholder engagement, and forward-looking planning to anticipate future challenges.

7.1 Key Benefits of Sustainability and Impact

- **Continuity:** A strong institutional memory ensures uninterrupted progress on AML/CFT/CPF initiatives despite staff changes or leadership transitions.
- **Accountability:** Routine performance evaluations reinforce accountability, ensuring that IMCs/NCCs remain focused on objectives and deliver measurable outcomes.
- **Stakeholders buy-in:** Active engagement with the private sector, civil society, and the public enhances trust, collaboration, and a shared sense of responsibility in combating financial crimes.
- **Resilience:** Sustainable structures enable IMCs/NCCs to adapt to evolving ML/TF/PF risks, ensuring lasting national and regional stability.

7.2 Resource Mobilisation Plan

A comprehensive resource mobilisation plan ensures that IMCs/NCCs have reliable and diversified access to the financial, technical, and human resources necessary to sustain their operations.

i. National Budgets

- Advocate for prioritising AML/CFT/CPF programs in national budgetary allocations.
- Present evidence-based justifications demonstrating the economic, governance, and security implications of ML/TF/PF to secure government commitment.
- Engage with parliamentary committees and budget authorities to obtain multi-year funding commitments that guarantee continuity of operations.

ii. Donor Agencies

- Identify and engage development partners and donor institutions such as the World Bank, IMF, and United Nations agencies that provide financial or technical support for AML/CFT/CPF initiatives.
- Develop well-structured project proposals aligned with donor priorities, focusing on capacity building, technology acquisition, and thematic initiatives such as terrorist financing prevention or beneficial ownership transparency.

iii. International Partners

- Collaborate with GIABA and other international bodies to access grants, technical expertise, and peer-learning opportunities.
- Establish bilateral partnerships with countries and institutions that have advanced AML/CFT/CPF frameworks, facilitating mentorship and joint capacity-building programs.

iv. Private Sector Engagement

- Encourage private sector participation through partnerships with financial institutions, professional associations, and technology providers.
- Promote co-financing arrangements for targeted initiatives such as awareness campaigns, digital infrastructure upgrades, and compliance tool development.
- Establish voluntary contribution mechanisms where private entities can support AML/CFT/CPF activities in exchange for capacity-building support or risk management tools.

v. Innovative Financing Mechanisms

- Explore alternative funding arrangements, including Public–Private Partnerships (PPPs), to jointly finance AML/CFT/CPF projects of national importance.
- Advocate for the allocation of a portion of confiscated or recovered criminal assets to fund national AML/CFT/CPF initiatives.
- Pursue cost-sharing and co-funding models among agencies and international partners to enhance financial sustainability while promoting shared ownership of results.

7.3 Recommendations for Effective Resource Management

Efficient resource management is essential to the sustainability and effectiveness of IMCs/NCCs. Sound financial planning, transparency, and continuous assessment enable committees to maintain operational stability and achieve long-term AML/CFT/CPF objectives.

7.3.1 Key Recommendations

- **Develop a multi-year financial plan:** Establish a structured financial strategy that aligns resource allocation with national AML/CFT/CPF priorities and projected funding sources. The plan should identify both domestic and external funding streams to ensure predictable and sustained financing.
- **Ensure transparency and accountability:** Implement robust financial reporting and audit mechanisms to promote donor confidence and demonstrate responsible fund utilisation. Regular publication of financial performance reports enhances credibility and supports ongoing support from partners and government institutions.
- **Conduct regular funding assessments:** Periodically review financial requirements, funding gaps, and resource utilisation efficiency. Findings from these assessments should guide future mobilisation efforts, ensuring resources are directed toward high-impact areas and priority interventions.

7.3.2 Long-Term Vision

To remain effective in countering ML/TF/PF, IMCs/NCCs must anticipate and adapt to emerging risks, technological innovations, and evolving geopolitical and regulatory landscapes. Sustained relevance will depend on forward-looking strategies that strengthen institutional agility, reinforce cooperation, and promote innovation in risk detection and policy implementation.

7.3.3 Future Challenges and Threats

i. Evolving Financial Technologies: The rapid growth of virtual assets, decentralised finance (DeFi), and artificial intelligence (AI)-driven financial platforms presents new opportunities for misuse. These technologies can obscure beneficial ownership and facilitate cross-border illicit flows.

Recommendation: Develop specialised expertise, technical monitoring tools, and supervisory capacity to identify and mitigate risks associated with emerging financial technologies.

ii. Transnational Crime and Globalisation: Expanding global trade, financial integration, and international organised crime syndicates continue to challenge the effectiveness of national AML/CFT/CPF frameworks. Trade-based money laundering (TBML) and illicit cross-border flows remain persistent threats.

Recommendation: Strengthen international cooperation, mutual legal assistance, and intelligence-sharing mechanisms to combat transnational financial crimes effectively.

iii. Environmental and Political Factors: Climate-related disruptions, economic instability, and geopolitical tensions can create vulnerabilities, particularly through increased reliance on informal financial systems and humanitarian cash flows.

Recommendation: Adapt risk assessments and policy responses to reflect changing environmental, political, and socio-economic contexts that may influence financial crime risks.

iv. Sophistication of Criminal Networks: Criminal enterprises are employing complex layering techniques, shell structures, and digital anonymity tools to conceal illicit proceeds.

Recommendation: Invest in advanced analytics, data-mining technologies, and targeted capacity-building to enhance detection, investigation, and prosecution of complex financial crime schemes.

7.4 Strategies for Adaptation

7.4.1 Dynamic Risk Assessments

IMCs/NCCs should institutionalise continuous risk assessment processes that capture emerging typologies and sectoral vulnerabilities. Scenario-based analysis should be used to anticipate evolving threats and develop contingency plans.

- Regularly update National Risk Assessments (NRAs) to include new risks linked to fintech, DeFi, and environmental or geopolitical factors.
- Use trend analysis and predictive modelling to guide policy adjustments and resource allocation.

7.4.2 Capacity Building

Sustained investment in human capital is essential for adapting to evolving threats.

- Establish continuous professional development programs covering areas such as blockchain analysis, VA supervision, cyber-enabled financial crimes, and cross-border cooperation.
- Partner with academic and research institutions to support innovation, research, and advanced technical training on AML/CFT/CPF developments.

7.4.3 Strengthened Governance Frameworks

Legal and institutional systems must be designed to remain flexible and responsive to new challenges.

- Regularly review and update laws, regulations, and policies to reflect FATF revisions and technological advances.
- Institutionalise processes for structured policy review, performance evaluation, and feedback integration.

7.4.4 Investment in Technology

Technology investment should be strategic, scalable, and sustainable to keep pace with evolving threats.

- Adopt AI-driven analytics, blockchain monitoring solutions, and interoperable data platforms to enhance detection and coordination.
- Develop a national digital transformation roadmap to guide technology acquisition, integration, and maintenance across AML/CFT/CPF agencies.

7.4.5 Stakeholder Engagement

The long-term success of AML/CFT/CPF frameworks relies on inclusive and coordinated partnerships.

- Deepen collaboration with private sector actors, CSOs, and international partners to strengthen collective responses to financial crime.
- Institutionalise stakeholder consultation mechanisms to identify emerging risks, share intelligence, and co-develop innovative solutions.
- Promote joint training programs and regional experience-sharing platforms to build a unified and adaptive AML/CFT/CPF ecosystem.

7.5 Key Outcomes of Emphasising Sustainability

Prioritising sustainability within AML/CFT/CPF frameworks ensures that IMCs/NCCs remain effective, resilient, and responsive to evolving threats. Sustainable operations foster institutional stability, strengthen stakeholder confidence, and reinforce the long-term integrity of national and regional systems.

7.5.1 Consistency

A comprehensive resource mobilisation strategy guarantees continuity of operations and steady progress toward AML/CFT/CPF objectives. Consistent funding and planning enable IMCs/NCCs to implement national strategies without interruption, ensuring that reforms and enforcement actions are sustained over time.

7.5.2 Adaptability

A clearly defined long-term vision enables IMCs/NCCs to anticipate emerging threats, adapt to new technologies, and adjust policy responses proactively. This flexibility ensures that national frameworks remain aligned with global standards and capable of addressing dynamic financial crime environments.

7.5.3 Collaboration

Enhanced engagement with development partners, the private sector, and international organisations promotes shared responsibility and collective resilience. Collaboration strengthens capacity, facilitates knowledge exchange, and supports harmonised regional efforts to combat ML/TF/PF.

7.5.4 Effectiveness

Sustainability translates directly into improved effectiveness. Well-resourced and forward-looking IMCs/NCCs can maintain strong compliance with international standards, execute their mandates efficiently, and demonstrate measurable impact in reducing financial crime vulnerabilities.

8

CONCLUSION

This Operational Manual serves as a strategic instrument designed to guide and IMCs/NCCs in effectively fulfilling their mandate to combat financial crimes across GIABA member states. It provides a comprehensive and adaptable framework that integrates international standards, regional directives, and practical operational procedures, ensuring that national systems are equipped to address the evolving challenges of ML/TF/PF.

Through its focus on collaboration, resource optimisation, and continuous improvement, the Manual promotes a unified and sustainable national response to emerging risks. It positions IMCs/NCCs as dynamic entities capable of adapting to technological change, leveraging innovation, and engaging a broad range of stakeholders to foster a culture of compliance, transparency, and resilience.

The effective implementation of this Manual will reinforce the AML/CFT/CPF architecture within individual member states while deepening regional cooperation and coherence. This collective effort will strengthen the integrity of West Africa's financial systems, enhance investor confidence, and contribute to broader regional stability and security.

By committing to the principles and recommendations outlined herein, GIABA member states reaffirm their shared determination to protect financial systems from criminal abuse and to promote integrity, accountability, and sustainable economic growth.

Ultimately, this Manual represents a call to action for all stakeholders including government institutions, private sector actors, civil society, and international partners to collaborate, share expertise, and uphold their collective responsibility in safeguarding the region's financial systems. Through joint commitment and sustained action, West Africa can achieve a secure, transparent, and resilient financial environment that supports development and strengthens public trust.

ANNEX 1

Sample Memorandum of Understanding (MoU) for enhancing Interagency Cooperation

MEMORANDUM OF UNDERSTANDING (MoU)
BETWEEN
[Agency A Name]
AND
[Agency B Name]
FOR ENHANCING COOPERATION AND COORDINATION ON ANTI-MONEY LAUNDERING (AML), COUNTERING THE FINANCING OF TERRORISM (CFT), AND COUNTERING PROLIFERATION FINANCING (CPF)

1. Purpose
This Memorandum of Understanding (MoU) is entered into by [Agency A Name] and [Agency B Name], collectively referred to as "the Parties," to establish a framework for cooperation and coordination in addressing Money Laundering (ML), Terrorist Financing (TF), and Proliferation Financing (PF). This MoU aims to enhance information sharing, operational collaboration, and capacity building between the Parties, in compliance with national laws and international standards such as those set by the Financial Action Task Force (FATF).

2. Objectives
The objectives of this MoU are to:
i. Strengthen interagency communication and collaboration to combat ML/TF/PF effectively.
ii. Promote the timely exchange of information and intelligence.
iii. Enhance capacity building through joint training programs and resource sharing.
iv. Support the implementation of National Risk Assessments (NRAs) and risk-based policies.
v. Facilitate cooperation on investigations, prosecutions, and asset recovery.

3. Scope of Cooperation
The Parties agree to cooperate in the following areas:

i. Information Sharing:
- **a.** Share data and intelligence relevant to ML/TF/PF cases, subject to confidentiality requirements.
- **b.** Provide each other access to non-sensitive analytical reports and risk assessments.

ii. Operational Collaboration:
- **a.** Coordinate on joint investigations and operations targeting financial crimes.
- **b.** Establish protocols for conducting parallel investigations where applicable.

iii. Training and Capacity Building:
- **a.** Organise joint workshops, seminars, and training sessions for staff on AML/CFT/CPF standards and emerging threats.
- **b.** Share technical expertise and best practices to enhance institutional capacity.

iv. Compliance and Reporting:
- **a.** Collaborate on preparing national compliance reports for GIABA and FATF.
- **b.** Support implementation of mutual assessment recommendations.

4. Principles of Cooperation
The Parties commit to:
i. Mutual Respect and Trust: Operate based on mutual respect, trust, and shared responsibilities.
ii. Confidentiality: Safeguard sensitive information exchanged under this MoU and restrict its use to agreed purposes.
iii. Timeliness: Respond promptly to requests for assistance or information, ensuring timely and efficient cooperation.

5. Implementation Mechanism
i. Coordination Focal Points:
Each Party shall designate a focal point to facilitate communication and oversee the implementation of this MoU.

ii. Regular Meetings:
The Parties shall hold quarterly meetings to review progress, discuss challenges, and identify opportunities for enhanced collaboration.

iii. Joint Working Groups:
Establish joint working groups to address specific issues, such as risk assessments, policy development, or high-priority investigations.

6. Confidentiality and Data Protection
i. Information exchanged under this MoU shall remain confidential and be used solely for the purposes outlined herein.
ii. The Parties shall adhere to applicable national laws and regulations governing data protection and privacy.

7. Duration and Termination
i. This MoU shall remain in effect for a period of [X years], commencing on the date of signing, and may be renewed upon mutual agreement.
ii. Either Party may terminate this MoU by providing [X days/months] written notice to the other Party

8. Amendments
This MoU may be amended by mutual written agreement between the Parties.

9. Dispute Resolution
Any disputes arising from the interpretation or implementation of this MoU shall be resolved through mutual consultation and negotiation.

10. Signatories
IN WITNESS WHEREOF, the Parties have executed this Memorandum of Understanding as of the [Day] of [Month], [Year].

For [Agency A Name]:
Name: _____
Title: _____
Signature: _____
Date: _____

For [Agency B Name]:
Name: _____
Title: _____
Signature: _____
Date: _____

ANNEX 2

Sample Memorandum of Understanding (MoU) for Establishing a Joint Operational Task Force

MEMORANDUM OF UNDERSTANDING (MoU)
BETWEEN
[Agency A Name]
AND
[Agency B Name]
AND
[Any Additional Agencies]

FOR THE ESTABLISHMENT OF A JOINT OPERATIONAL TASK FORCE ON ANTI-MONEY LAUNDERING (AML), COUNTERING THE FINANCING OF TERRORISM (CFT), AND COUNTERING PROLIFERATION FINANCING (CPF)

1. Purpose
This Memorandum of Understanding (MoU) is entered into by [Agency A Name], [Agency B Name], and [Any Additional Agencies], hereinafter referred to as "the Parties," to establish a Joint Operational Task Force (JOTF) to enhance collaboration and operational effectiveness in combating Money Laundering (ML), Terrorist Financing (TF), and Proliferation Financing (PF). The JOTF will serve as a platform for joint investigations, intelligence sharing, and coordinated enforcement actions.

2. Objectives
The objectives of this MoU are to:
i. Establish a formalised structure for joint operational efforts against ML/TF/PF.
ii. Enhance the timely exchange of intelligence and operational data among the Parties.
iii. Coordinate joint actions, including investigations, arrests, asset recovery, and prosecution of offenders.
iv. Build the capacity of the Parties to handle complex and transnational financial crime cases.
v. Promote compliance with national and international AML/CFT/CPF obligations.

3. Scope of Cooperation
The Parties agree to cooperate in the following areas:

i. Joint Investigations and Operations:
- **a.** Conduct joint investigations into high-priority ML/TF/PF cases.
- **b.** Share resources like staff, technical expertise and equipment to support operations.

ii. Intelligence Sharing:
- **a.** Exchange operational intelligence, subject to confidentiality and data protection requirements.
- **b.** Establish secure communication channels for real-time intelligence sharing.

iii. Operational Planning and Coordination:
- **a.** Develop joint operational plans, including objectives, timelines, and resource allocation.
- **b.** Assign roles and responsibilities to ensure clarity and accountability during operations.

iv. Capacity Building:
- **a.** Organise joint training sessions and simulations to enhance operational readiness.
- **b.** Exchange best practices and lessons from past operations.

v. Asset Recovery and Prosecution Support:

- **a.** Collaborate on identifying, freezing and confiscating illegal assets.
- **b.** Provide mutual support in preparing cases for prosecution, including evidence sharing and legal coordination.

4. Governance Structure

i. Task Force Leadership:

- **a.** A designated leader (or co-leaders) shall oversee the activities of the JOTF.
- **b.** Leadership roles will rotate periodically or as agreed by the Parties.

ii. Steering Committee:

- **a.** A steering committee comprising senior representatives from each Party will provide strategic direction and oversight.

iii. Operational Units:

- **a.** The JOTF shall be organised into specialised units, such as investigation, intelligence, legal support, and asset recovery units, based on operational needs.

5. Operational Guidelines

v. Decision-Making:

- **a.** Decisions shall be made through consensus or majority voting among the Parties.
- **b.** Urgent operational decisions may be delegated to the Task Force Leader.

vi. Resource Sharing:

- **a.** The Parties agree to share resources, including personnel, equipment, and facilities, as required for the execution of joint operations.

vii. Regular Meetings:

- **a.** The JOTF shall convene monthly meetings to review progress, address challenges, and plan upcoming operations.
- **b.** Emergency meetings may be convened as needed to respond to urgent threats or incidents.

viii. Monitoring and Reporting:

- **a.** The Task Force Leader shall submit periodic progress reports to the Parties, highlighting achievements, challenges, and recommendations.
- **b.** Key performance indicators (KPIs) shall be established to evaluate the effectiveness of the JOTF.

6. Confidentiality and Data Protection

i. Information shared within the JOTF shall remain confidential and be used solely for the purposes outlined in this MoU.

ii. The Parties shall follow national laws and regulations on data protection and ensure the secure handling of sensitive information.

7. Duration and Termination

i. This MoU shall remain in effect for a period of [X years], commencing on the date of signing, and may be renewed upon mutual agreement.

ii. Any Party may withdraw from the MoU by providing [X days/months] written notice to the other Parties.

8. Amendments
This MoU may be amended by mutual written agreement of all Parties.

9. Dispute Resolution
Disputes arising from the interpretation or implementation of this Memorandum of Understanding (MoU) shall be resolved through mutual consultation and negotiation among the Parties. If the Parties cannot resolve the dispute through negotiation within [X days/months], they may:
i. Seek mediation from a neutral third party agreed upon by all Parties.
ii. Refer the dispute to arbitration, with the arbitrator's decision being final and binding. The rules governing the arbitration process shall be determined by mutual agreement.
The Parties agree to make every effort to resolve disputes in a manner that preserves the integrity and functionality of the Joint Operational Task Force (JOTF).

10. Signatories
IN WITNESS WHEREOF, the Parties have executed this Memorandum of Understanding as of the [Day] of [Month], [Year]. This MoU signifies the commitment of the Parties to collaborate in combating Money Laundering (ML), Terrorist Financing (TF), and Proliferation Financing (PF) effectively and efficiently.

For [Agency A Name]:

Name: _____
Title: _____
Signature: _____
Date: _____

For [Agency B Name]:
Name: _____
Title: _____
Signature: _____
Date: _____

For [Agency C Name]:
Name: _____
Title: _____
Signature: _____
Date: _____

ANNEX 3

Sample templates for key tasks - meeting agendas, risk update, and progress reports

1. Sample Meeting Agenda Template
[Committee/Task Force Name] Meeting Agenda
Date: [Insert Date]
Time: [Insert Start Time – End Time]
Location: [Insert Location or Virtual Meeting Link]
Chairperson: [Insert Name and Title]
Facilitator: [Insert Name, if applicable]
Agenda:

i. Welcome and Opening Remarks
- **a.** Chairperson's Opening Statement [5 minutes]

ii. Review and Approval of Previous Meeting Minutes
- **a.** Review Action Items from Last Meeting [10 minutes]

iii. Updates and Reports
- **a.** [Agency A Name] Update on Ongoing Activities [10 minutes]
- **b.** [Agency B Name] Operational Highlights [10 minutes]
- **c.** Financial Intelligence Unit (FIU) Insights [10 minutes]

iv. Discussion Points
- **a.** Review of Risk Assessment Findings [15 minutes]
- **b.** Update on Joint Operations/Investigations [20 minutes]
- **c.** Resource Allocation for Upcoming Tasks [15 minutes]

v. New Business
- **a.** Emerging Risks and Threats [10 minutes]
- **b.** Opportunities for Capacity Building [10 minutes]

vi. Action Items and Next Steps
- **a.** Summary of Agreed Actions and Deadlines [10 minutes]

vii. Any Other Business (AOB) [5 minutes]

viii. Closing Remarks
- Chairperson's Closing Comments [5 minutes]

Adjournment

2. Risk Assessment Template
[Organisation/Committee Name] Risk Assessment Template
Date: [Insert Date]
Prepared by: [Insert Name/Title]
Objective
- Purpose of the Risk Assessment: [e.g., Identify and evaluate ML/TF/PF risks in high-priority sectors].

Scope
- Sectors/Entities Assessed: [e.g., Financial Institutions, DNFBPs, Informal Economies].

3. Methodology
- Tools and Data Sources: [e.g., STRs, law enforcement reports, stakeholder surveys].
- Risk Rating Criteria: [Define Low, Medium, High categories].

4. Key Findings

Sector/Activity	Risk Level	Vulnerabilities Identified	Mitigation Measures
Financial Institutions	High	Weak KYC procedures, lack of STR submissions	Strengthen training and supervision.
Cross-Border Trade	Medium	Undeclared cash movements	Increase border controls.
Virtual Asset Providers	High	Lack of regulation	Develop and implement regulations.

5. Recommendations
i. [Insert Recommendation 1]
ii. [Insert Recommendation 2]

6. Next Steps
● [Insert Specific Actions with Deadlines]
3. Progress Report Template
[Organisation/Committee Name] Progress Report
Date: [Insert Date]
Reporting Period: [Insert Timeframe]
Prepared by: [Insert Name/Title]

1. Executive Summary
- Brief Overview of Achievements: [e.g., Successful completion of [X] operations, new policies implemented].
- Key Challenges: [e.g., Resource constraints, interagency communication gaps].

2. Progress on Objectives

Objective	Target	Progress Made	Challenges	Next Steps
Improve STR Analysis	Increase STR processing by 20%	Achieved 15% increase.	Lack of FIU staff resources.	Recruit additional analysts.
Conduct Joint Operations	Launch 5 joint investigations.	4 investigations completed.	Jurisdictional conflicts.	Improve interagency protocols.

3. Risk Assessment Updates
- New Risks Identified: [e.g., Increased use of virtual assets for illicit transfers].
- Mitigation Measures Implemented: [e.g., Draft regulations for virtual assets].

4. Resource Utilisation
- Budget Allocations: [e.g., $X allocated to training, $Y to operations].
- Expenditures: [Provide details of resource use].

5. Stakeholder Engagement
- Workshops/Training Held: [e.g., 3 capacity-building workshops conducted for DNFBPs].
- Feedback Received: [e.g., Requests for additional guidance on compliance requirements].

6. Recommendations and Next Steps
i. [Insert Recommendation 1]
ii. [Insert Recommendation 2]

Submitted by:
[Name]
[Title]
[Contact Information]



Complexe SICAP Point E, Immeuble A, 1er Etage
Avenue Cheikh Anta Diop x Canal IV
B.P. : 32 400 Dakar - Ponty (Sénégal)
Standard : (+221) 33 859 18 18
Fax : (+221) 33 824 17 45
www.giaba.org