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Gabinete de Informação Financeira
Financial Intelligence Office



2022

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Annual Report

Financial Intelligence Office
2022 Annual Report



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Director's Message

In 2022, Coronavirus disease 2019 (COVID-19) pandemic continued in Macao Special Administrative Region (Macao SAR), with a large-scale community outbreak occurring between June and August. The overall impact of the pandemic was overwhelming, resulting in temporarily suspension of business operations of all business and commercial enterprises. As economic activities and transactions decreased, the number of Suspicious Transaction Reports (STRs) had shown a notable degree of decline accordingly.

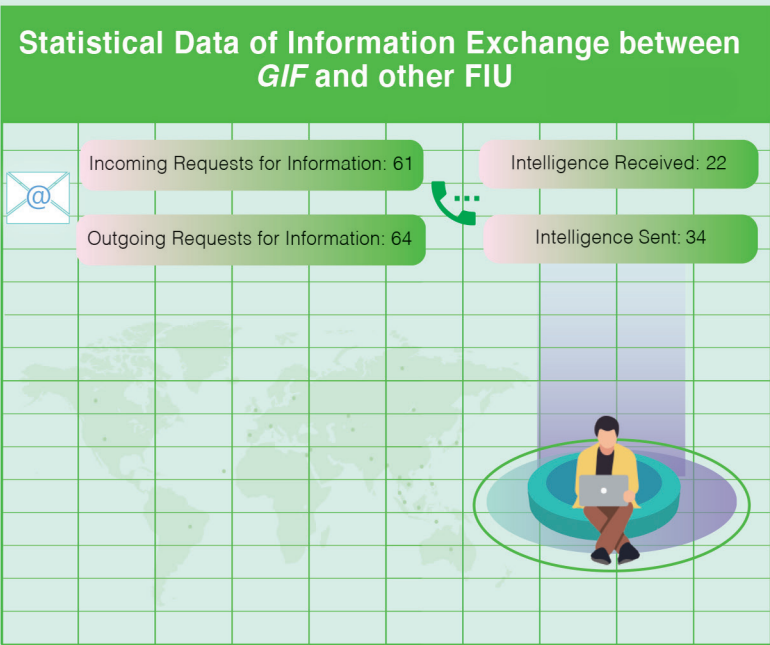
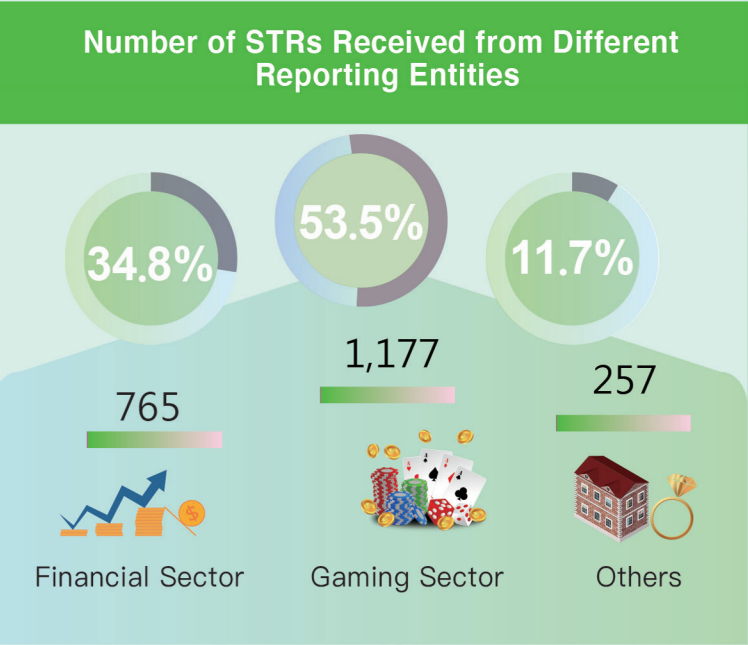
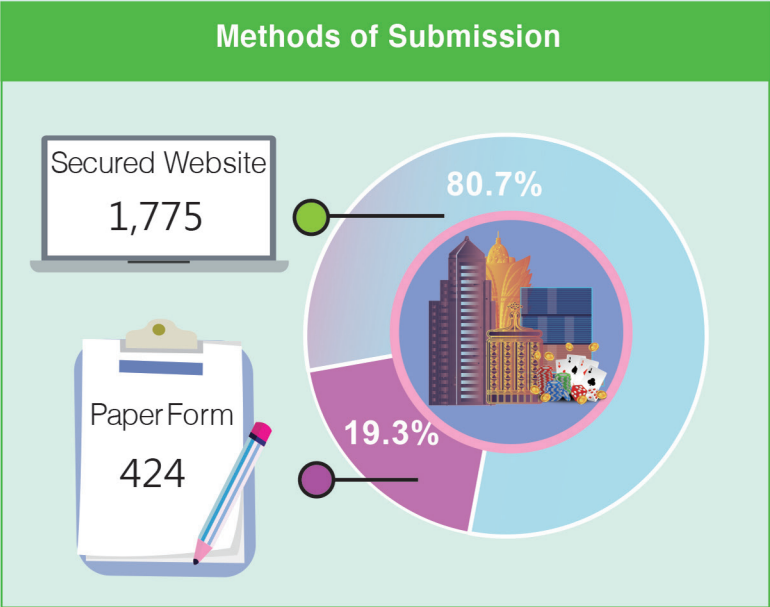
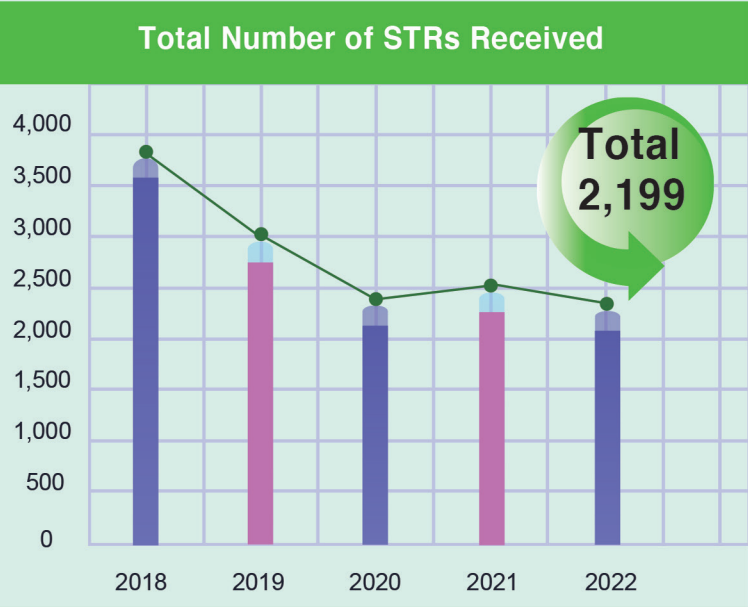
Although the economy and livelihood in Macao SAR had been severely affected by COVID-19 which led to a decline in the number of STRs, the overall numbers of STR referred by the Financial Intelligence Office (*GIF*) to the Public Prosecutions Office (*MP*) of Macao SAR in 2022 had, in contrast, shown a significant increase. The main reasons were the continuous deployment of resources by reporting entities in detecting suspicious transactions and the improvement of internal collaboration among law enforcement agencies (LEAs) so as to enhance the effectiveness of tracing criminal funds and combating money laundering (ML), and to strengthen the measures to prevent criminals from committing ML and terrorist financing (TF) crimes. *GIF* had also improved the intelligence exchange and cooperation with LEAs, improved the quality of intelligence and enriched analysis as well as increasing the quantity and effectiveness of cases referred to the *MP*.

In addition, in order to prepare for the next round of mutual evaluation by the Asia/Pacific Group on Money Laundering (APG), the Working Group participated in meetings and trainings of the international organization risk assessment tools by professional team in 2021, and subsequently carried out the 3rd round overall ML, TF and proliferation financing (PF) risk assessment of the Macao SAR. *GIF* used internationally recognized scientific assessment tools to collect industry data and assessed the implementation of Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT) laws and regulations. The relevant data was then input into database and analyzed precisely in order to conduct risk assessments over different industries, the overall data processing and assessment methodology were in line with international standards. We hope to upgrade the relevant ratings for Macao SAR in the next round of mutual evaluation and more importantly to understand the ML, TF and PF risks encountered by Macao SAR, so as to establish and improve various risk mitigation measures, and to enhance the overall prevention capabilities of Macao SAR.

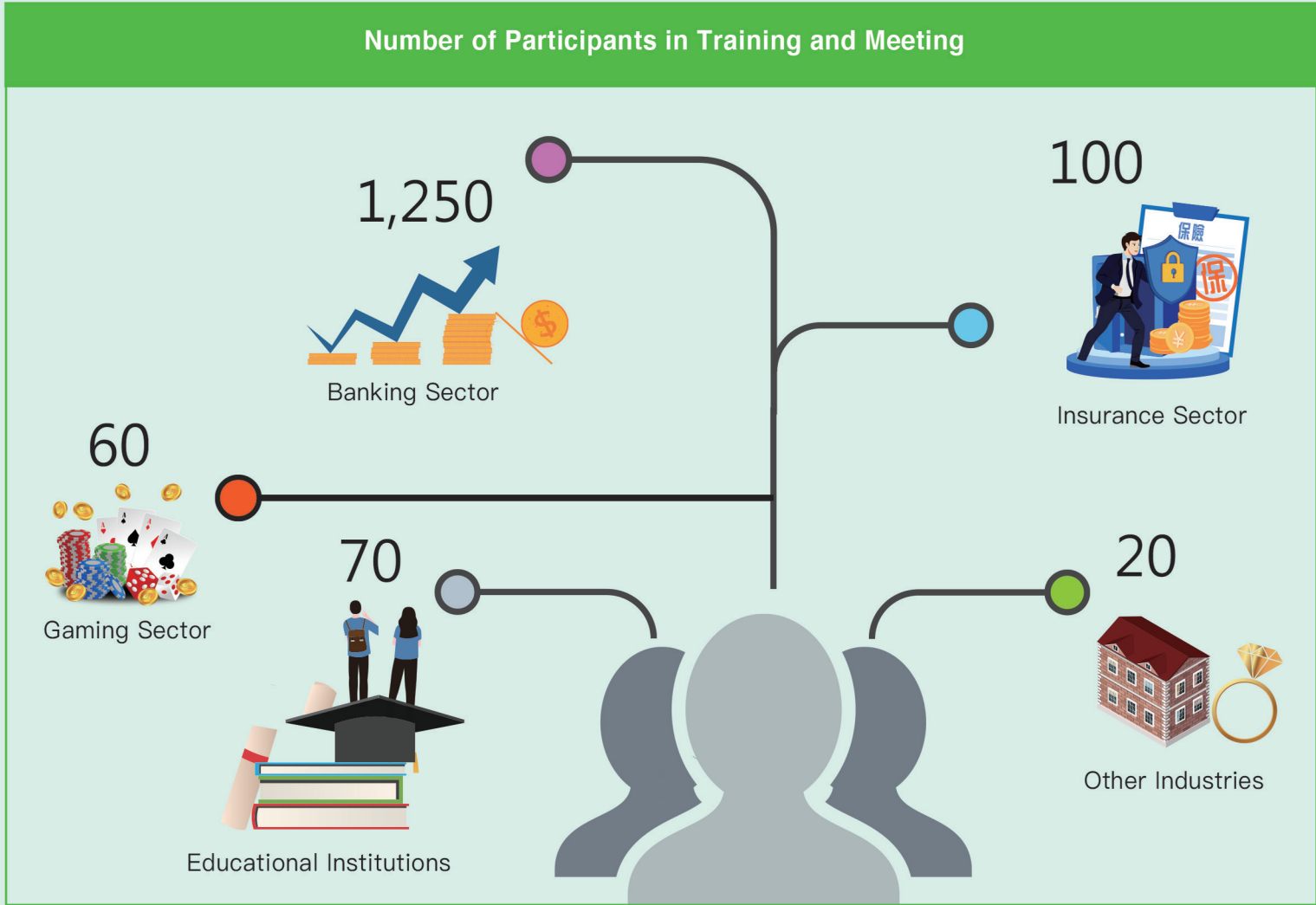
As the pandemic began to ease, relevant inbound travel restrictions were relaxed in 2023 so commercial and economic activities among Mainland China, Hong Kong, and Macao SAR resumed gradually. It is expected that people traveling across the three places, as well as the cross-border movement of funds, will progressively increase, therefore, strengthening cooperation among the three places in AML and CFT is of utmost importance. We realize that international cooperation is the key to success in the prevention and suppression of ML and TF. We will continue to communicate and cooperate with overseas counterparts and different sectors in Macao SAR, establish more comprehensive and secured channel for financial intelligence exchange and to improve the effectiveness of various preventive measures to resist the threats of ML and TF crimes. Furthermore, *GIF* is in the process of administrative restructuring in order to enhance its AML and CFT capabilities, which will enable us to prevent and suppress ML and TF activities more effectively so as to maintain the economic safety of Macao SAR.

Director
Chu Un I, Connie

Year 2022
Task Overview of STR Analysis Team of GIF



Local Trainings and Meetings



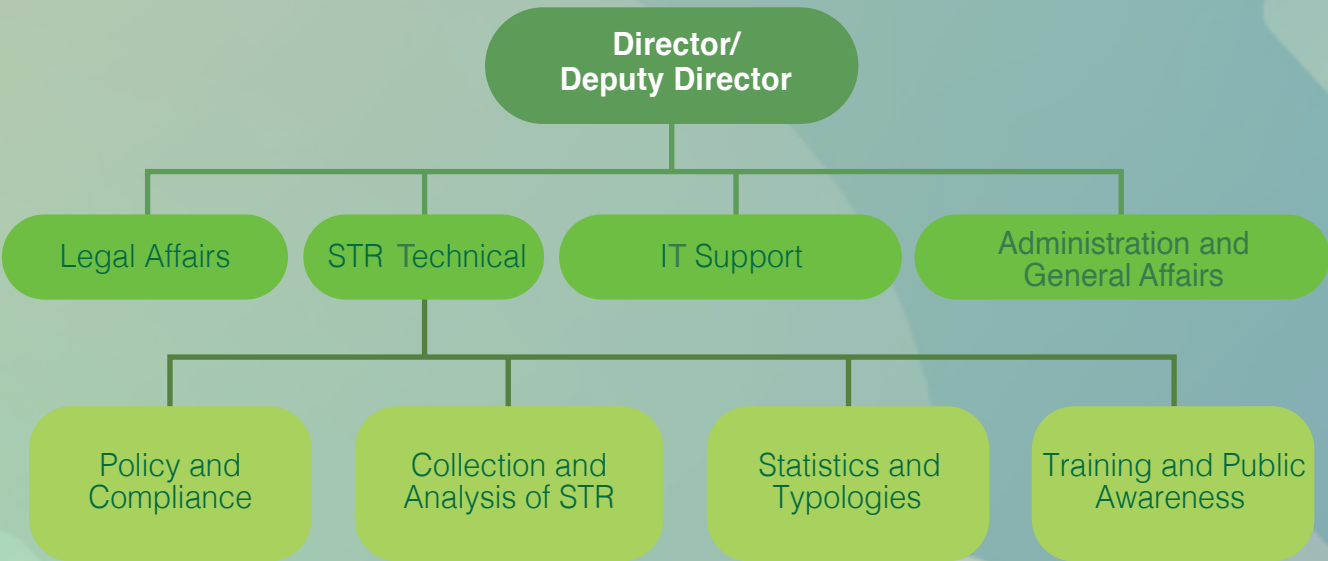
CHAPTER I - BACKGROUND AND ORGANIZATION STRUCTURE

1.1 GIF's Organization Background

GIF was established on 8th August 2006 under Executive Ruling no. 227/2006 with the primary role of collecting, analyzing and disseminating information on suspicious transactions of ML and TF. It was established for coping with the implementation of Law no. 2/2006 and Law no. 3/2006 in force, on "Prevention and Suppression of Crimes of Money Laundering" and "Prevention and Suppression of Crimes of Terrorism".

Under Executive Ruling no. 227/2006, GIF was set up in the form of a project entity with a term of 3 years that could be extended by Executive Ruling. The mandate of GIF was extended in May 2022 for one year until August 2023 by Executive Ruling no. 68/2022. In the future, the structure of GIF will be reorganized and no longer exist in the form of a project entity. GIF will be merged into the Unitary Police Service (SPU) as a permanent government department to continue to perform its functions and duties.

1.2 GIF's Organization Structure and Functions



The core function of GIF is to collect, analyze and disseminate relevant information to LEAs, judicial authorities or other entities vested with the authority to prevent and suppress crimes relating to ML or TF. In exercising such duties, GIF is granted with the following specific competence:

- To receive information provided in accordance with the prevalent Article 7 of the Administrative Regulation no. 7/2006 in force and to establish and maintain a database with such information;
- To analyze the information received and report the suspicious ML activities to the MP;
- To provide assistance to LEAs, judicial authorities and other entities empowered to prevent and suppress ML and TF crimes, based on their requests with stated legitimate reasons, particularly in the form of information sharing and technical support;
- To provide to and receive from foreign entities information about ML and TF crimes, for the implementation of inter-regional agreements or any other international law instruments;
- To collaborate with public entities to establish and revise AML/CFT guidelines;
- To develop promotion and education programs for public awareness about AML/CFT;
- To furnish the Secretary for Security with an annual report on its activities.

1.3 Duties of GIF

The Director takes on the leadership, coordination and management responsibilities so as to fulfill the duties stipulated in paragraph 2 of Article 8 of Law no. 2/2006, paragraph 2 of Article 11 of Law no. 3/2006 in force, and Executive Ruling no. 227/2006.

The duties of GIF are categorized into 4 main areas: Policy and Compliance, Collection and Analysis of STRs, Statistics and Typologies, and Training and Public Awareness. Such duties are performed with the support of the following 3 teams of back-office staff: Legal Affairs, Information Technology (IT) Support and Administration and General Affairs.

Policy and Compliance

GIF has the duty to keep track of international developments and update the information on international standards, laws and conventions. It liaises on continual basis with international bodies such as Financial Action Task Force (FATF), APG and the Egmont Group through the participation in the meetings of these professional bodies, commitments in the assessment missions of member jurisdictions, answer assessment questionnaires and enquiries in relation to AML/CFT. Domestically *GIF* follows up with the change in local laws and guidelines, and recommends new measures for keeping abreast with the latest developments in AML/CFT regime.

Collection and Analysis of STRs

GIF is responsible for collecting and analyzing STRs submitted by different reporting entities as well as inputting data collected through these STRs into the database. All incoming reports will be verified to ensure all data are properly filled in and initial feedback will be sent to the reporting entity accordingly. The initial feedback will be followed by subsequent follow-up replies if deemed necessary. At the same time analysis will be carried out, including data matching against existing records and intelligence provided by local law enforcement and foreign counterparts. *GIF* has been granted the authority to request additional information from reporting entities, if necessary, for in-depth analysis on any case, and to propose reported cases deemed suspicious to the *MP*.

Statistics and Typologies

GIF has to extract statistical data periodically from STRs received, as well as providing instructive information such as trends and typologies to the supervisory agencies. Analysis reports on typologies and transaction types will be prepared for internal and cross-departmental reference, and these reports may serve as insights for further policy review.

Training and Public Awareness

To arrange training and public awareness programs on AML/CFT is one of *GIF*'s important responsibilities. For this reason, *GIF* needs to search for suitable training resources provided by international bodies, arrange local courses by inviting experts from abroad, and take part in seminars and workshops overseas. At the same time, promotional campaigns by means of delivering AML/CFT trainings and seminars to reporting entities and public, broadcasting promotional videos on various platforms, as well as updating the content of WeChat Official Account of *GIF* and publication of newsletters on a regular basis are the common channels to raise public awareness about the importance of AML/CFT.

CHAPTER II - TREND AND DEVELOPMENT OF STRS

2.1 Statistical Data

GIF continues to carry out its duties as per Executive Ruling no. 227/2006 to perform statistics on STRs data and detailed STRs cases analysis. Compared with 2021, the number of STRs received by *GIF* decreased due to the pandemic situation in 2022.

Table 1: The Total Number of STRs Received and Their Variances

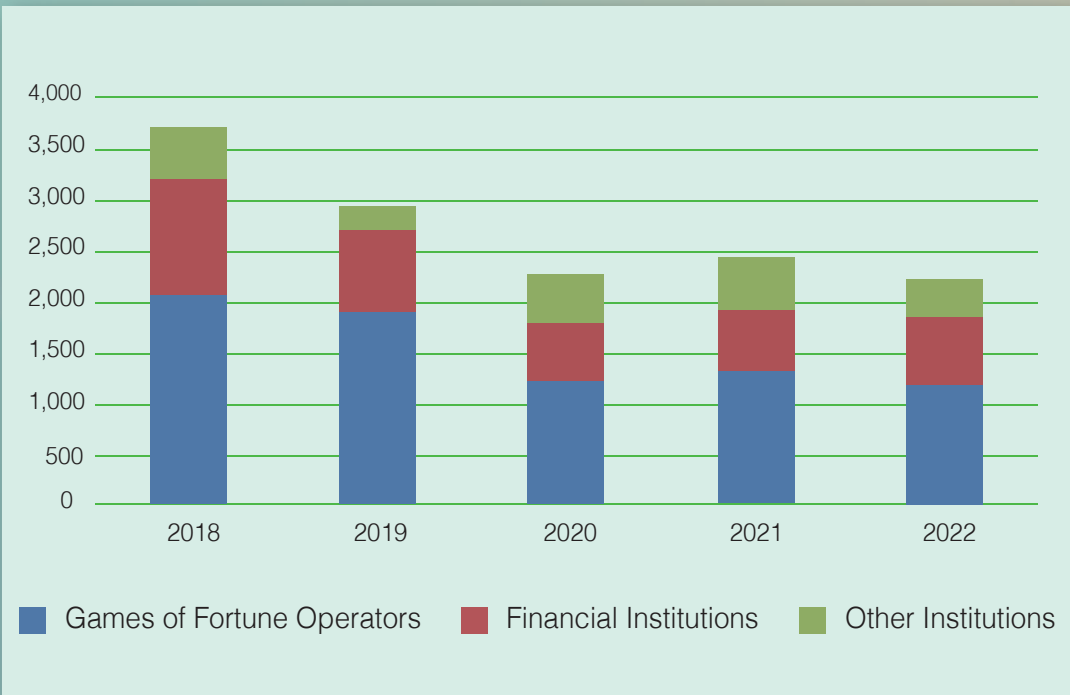
Year	Number of STRs	Variance
2018	3,716	+ 20.5%
2019	2,941	- 20.9%
2020	2,224	- 24.4%
2021	2,435	+ 9.5%
2022	2,199	- 9.7%

Among all STRs received in 2022, the gaming sector submitted 1,177 reports, financial sector submitted 765 reports, and other institutions submitted 257 reports, which accounted for 53.5%, 34.8% and 11.7% respectively. The total number of STRs has decreased by 9.7% as compared with 2021. As there was large-scale COVID outbreak from June to August 2022 in Macao SAR, all business and commercial enterprises temporarily suspended their operations, the economic activities and transactions thus decreased dramatically, as such the number of STRs had also decreased accordingly. The decrease mainly reflected in gaming sector and other institutions, the STRs submitted by these sectors have decreased by 11.5% and 17.6% respectively, while the number of reports submitted by financial sector has slightly decreased by 3.5%. Statistical information relating to the number of STRs received in 2022 is given in Table 2 and Chart 1.

Table 2: Statistical Data of STRs Received from 2018 to 2022

Reporting Entity	Number of STRs					Variance '21 vs '22
	2018	2019	2020	2021	2022	
Financial Institutions	1,122	880	677	793	765	- 3.5%
Games of Fortune Operators	2,087	1,913	1,215	1,330	1,177	-11.5%
Other Institutions	507	148	332	312	257	-17.6%
Total	3,716	2,941	2,224	2,435	2,199	- 9.7%

Chart 1: Number of STRs Filed by Sectors in 2018 - 2022



During 2022, *GIF* disseminated 162 STRs to *MP*, which has increased by 60.4% as compared with 2021. The significant increase in the number of STRs disseminated to *MP* was mainly due to the effective internal collaboration within LEAs in tracing criminal proceeds and different measures were undertaken to combat ML and TF crimes. In addition, the continuous investment of resources by reporting entities in detecting suspicious transactions and the increase in information exchange between *GIF* and counterparts could enrich the analysis of STR, which ultimately lead to more cases referred to *MP*.

○ 2.2 Statistics on Recent Trends of Suspicious Transactions

“Irregular large cash withdrawals” was the most common typology in 2022. The second to sixth ranking included “Significant cash deposit with non-verifiable source of funds”, “Use of automated teller machine (ATM), phone banking, cash deposit machine (CDM)”, “Use of cheques/promissory notes/account transfer etc. to transfer funds”, “Gambling activities (casinos, horse racing, internet gambling etc.)” and “Chips conversion without/with minimal gambling activities”. These rankings were basically the same as in 2021, as *GIF* received a large number of STRs related to frequent use of ATM/CDM for cash withdrawal and exchange transactions in 2022. The typology “Gambling activities (casinos, horse racing, internet gambling etc.)” has significantly increased because of the more frequent irregular gaming activities in casinos. The top 10 most prevailing typologies (in terms of occurrence) in 2022 are given in the following Chart 2 and Table 3.

Chart 2: Ranking of Statistics on Typologies of STRs

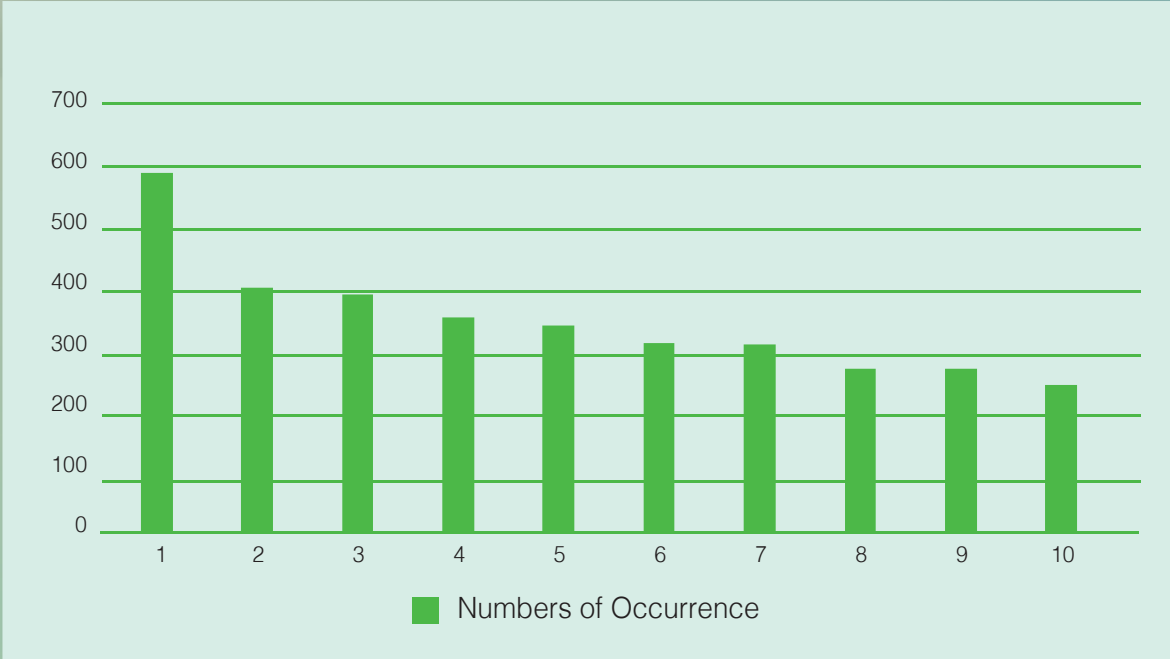


Table 3: Ranking of Statistics on Typologies of STRs (in order of occurrence)

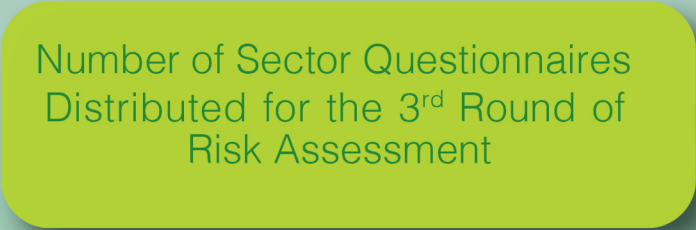
Typologies		Number of STRs
1	Irregular large cash withdrawals	582
2	Significant cash deposit with non-verifiable source of funds	397
3	Use of ATM, phone banking, CDM	385
4	Use of cheques/promissory notes/account transfer etc. to transfer funds	349
5	Gambling activities (casinos, horse racing, internet gambling etc.)	334
6	Chips conversion without/with minimal gambling activities	307
7	Suspicious wire transfers	305
8	Use of online banking/internet	265
9	Possible Match with International Watch-list or other Black List	265
10	Related to others crimes	238
11	Others*	1,595

*Other typologies include “Suspected to be engaged in illegal financial activities”, “Chips conversion/marker redemption on behalf of third party(ies)”, “Currency exchanges/cash conversion”, “Suspected Underground banking/alternative remittance services” and “Insurance transaction”, etc.

Year 2022
Task Overview of Policy Team of GIF

Total Number of MOU Signed
(accumulative over years)

29



CHAPTER III - COORDINATION OF AML/CFT WORK IN MACAO SAR

3.1 Coordination of the Interdepartmental AML/CFT Working Group

In order to strengthen the coordination work in the AML/CFT regime in Macao SAR, the Interdepartmental AML/CFT Working Group was established in 2002 and formalized in 2014. The AML/CFT Working Group is an interdepartmental group of different judicial authorities and government agencies, it has been working smoothly and closely for many years. Functions of the AML/CFT Working Group are specified as follows:

- (1) Coordination and follow-up of the works related to the evaluation and assessment of Macao SAR conducted by international and inter-regional AML/CFT organizations, especially in coordinating the collection of related necessary data;
- (2) Carrying out policy studies related to AML/CFT;
- (3) Provision of AML/CFT training and public awareness programs to the economic sectors involved in the fight against ML and TF;
- (4) Exchange of information on trends related to AML/CFT;
- (5) Establishment of special sub-Working Groups whenever deemed necessary for the study of some particular AML/CFT related issues.

The Interdepartmental AML/CFT Working Group continued to follow up all the AML/CFT related works in Macao SAR. GIF continues to be the coordinator of the Interdepartmental AML/CFT Working Group and meetings were held regularly. At present, the AML/CFT Working Group is comprised of 14 different government agencies of supervisory, legal and law enforcement nature, including (in alphabetical order of Portuguese acronym):

- (1) Monetary Authority of Macao (AMCM)
- (2) Commission Against Corruption (CCAC)
- (3) Independent Committee for the Exercise of Disciplinary Power over Solicitors (CIEPDSS)
- (4) Public Security Force (CPSP)

- (5) Gaming Inspection and Coordination Bureau (*DICJ*)
- (6) Legal Affairs Bureau (*DSAJ*)
- (7) Economic and Technological Development Bureau (*DSEDT*)
- (8) Financial Services Bureau (*DSF*)
- (9) Housing Bureau (*IH*)
- (10) Public Prosecutions Office (*MP*)
- (11) Judiciary Police (*PJ*)
- (12) Macao Customs Service (*SA*)
- (13) Unitary Police Service (*SPU*) and
- (14) Financial Intelligence Office (*GIF*) (coordinator).

※ 3.1.1 Interdepartmental Coordination ※

During 2022, *GIF* organized 2 Interdepartmental AML/CFT Working Group meetings and 8 meetings with individual government or supervisory agencies, including *AMCM*, *CCAC*, *DICJ*, *DSAJ*, *DSEDT*, *DSF*, *IH*, *MP*, *PJ*, judicial authorities like The Court of the Macao SAR. The following issues were discussed:

- ML/TF/PF risk assessment of Macao SAR; (See Section 3.2)
- Coordinate the Asset Freezing Coordination Commission as the Secretariat in order to discuss the practical operational procedures of asset freezing and emergency notification mechanism, and held seminars on “Asset Freezing Regime” to different industries; (See Section 3.3) and
- Coordinate training activities for different judicial authorities and government agencies.

※ 3.1.2 Strategic Analysis ※

GIF has been coordinating relevant Interdepartmental AML/CFT Working Group members to carry out thematic risk assessments in various areas since 2009. Results and findings from those risk assessments have been shared among relevant judicial authorities and government agencies, meetings were also arranged to explain the risks identified and suggest risk mitigation measures. These ongoing risk assessment project studies include:

- a) Non-profit organization sector review based on international standard requirements;
- b) ML/TF risks based on STRs received in relation to the gaming sector;
- c) Analytical review on the enhanced customer due diligence data received from supervisory agency;
- d) Thematic review based on particular typologies from STRs;
- e) Review on risks of the cross-border cash declaration system.

These various strategic analysis reports cover the results from STR analysis as well as international AML/CFT developments. Whenever emerging trends or threats were detected, *GIF* will share the information with Interdepartmental AML/CFT Working Group members for follow-up actions, and discuss how to develop the relevant risk mitigation measures. These study reports served as useful reference for different judicial authorities and government agencies in preparing their AML/CFT work plan and policies, which include prioritizing their work according to the risks identified, allocating more resources in higher risk areas, amending the operational procedures and supervisory guidelines to incorporate risk mitigation measures. Most of the recommendations have been adopted by the respective judicial authorities and government agencies, with timely follow-up, so as to comply with the requirements of international organizations and reduce the risk of ML/TF involved in different industries.



The 1st Interdepartmental AML/CFT Working Group Meeting in 2022



The 2nd Interdepartmental AML/CFT Working Group Meeting in 2022



Meeting between GIF and SA

○ 3.2 ML/TF/PF Risk Assessment of the Macao SAR

In accordance with the requirement of FATF Recommendation 1, jurisdictions should identify, assess and understand their ML and TF risks. In addition, jurisdictions should apply a risk-based approach to allocate resources and mitigate risks identified, and should also conduct regular updates to maintain risk assessment to the latest status. The 1st and 2nd round of ML/TF risk assessments were completed in 2015 and 2019 respectively, in order to better prepare for the next round of APG Mutual Evaluation (ME), G/F coordinated the Interdepartmental AML/CFT Working Group to participate in the conferences/trainings of risk assessment tools from professional team of international organization in 2020 and 2021, and commenced the 3rd round of overall ML/TF/PF risk assessment of the Macao SAR after the above-mentioned conferences/trainings were completed.

The supervisory authorities in the Interdepartmental AML/CFT Working Group started to formulate/revise the supervision manual for the uniqueness of Designated Non-Financial Businesses and Professions (DNFBPs) since 2021 and completed the relevant work by the end of 2022. In 2023, the supervisory authorities will follow the content of the supervision manual, allocate appropriate resources to the industry and conduct supervision more effectively based on a risk-based approach.

In addition, in order to collate sectorial data and the implementation of AML/CFT laws and regulations from 2017 to 2020 for sector risk assessment, the supervisory authorities within the working group issued risk assessment questionnaires to regulated entities in 2021 or in the 1st quarter of 2022, approximately 2,200 questionnaires were sent out by the supervisory authorities for data collection, including financial institutions, gaming concessionaires/sub-concessionaires, gaming intermediaries and other DNFBPs such as real estate intermediaries and agents, dealers of precious metals and stones, pawn shops, car dealers, notaries, accounting and legal professionals as well as company service providers.

In 2022, the supervisory authorities collated the questionnaires and conducted in-depth analysis. The results of the questionnaires, overall sector risks and regulatory findings had been compiled in various sector review reports. The 1st draft of the five sector review reports had been finalized by 2022, including for the financial sector, the gaming sector, the real estate sector, the dealers of high value products and the company service providers (company services are provided by notaries, accounting and legal professionals). In addition, the threat analysis reports and related statistical data provided by the judicial authorities and LEAs, including the data of STRs from *GIF* had been consolidated, the 1st draft of the TF threat analysis report, the PF threat analysis report, and the legal person and legal arrangement risk analysis report had also been completed by the end of 2022. In the 4th quarter of 2022, *GIF* held meetings with LEAs and *AMCM* to discuss the scope of the report and the direction of data analysis.

GIF targets to complete the consolidated summarised version of the 3rd round overall ML/TF/PF risk assessment report of the Macao SAR for the stakeholders in the first half of 2023, and coordinate with the supervisory authorities in the second half of 2023 to organize seminars and workshops as well as provide promotional materials to raise the awareness of private entities to the ML/TF risks within their sectors and the requirements under the respective AML/CFT guidelines, with the aim to assist private entities in implementing risk-based management and enhancing their risk mitigation measures.

○ 3.3 Coordination of the Asset Freezing Coordination Commission

The Asset Freezing Coordination Commission (hereafter as “the Commission”) was established on 1st September 2016, in accordance with Paragraph 4 of Article 5 of Law no. 6/2016 “Asset Freezing Regime”. The main responsibilities of the Commission include: setting up and maintaining a public database available on its website, with an updated record of the designated natural and legal persons and entities, as well as of frozen assets; communicating to the entities in accordance with the “Asset Freezing Regime”; developing clear guidance to ensure compliance with obligations and duties, as well as providing technical advice. The Commission comprises member agencies including *SPU* (Coordinator), *MP*, *SA*, *DSAJ*, *AMCM*, *PJ* and *GIF* (the Secretariat of the Commission).

From its establishment in 2016 to the end of 2022, the Commission has held 15 meetings in total to optimize the practical operating procedures of the “Asset Freezing Regime” in a timely manner, continue to carry out outreach programs to enhance the awareness of reporting entities in relation to different sectors and improve the relevant notification mechanism.

The Commission held the 15th meeting in the year of 2022, mainly to discuss and actively exchange views on various agenda items, including risk assessment of PF and revision of the Commission’s internal regulations. In 2022, the Commission issued 5 notifications to the supervisory agencies on the publication of United Nations Security Council Resolution (UNSCR).

In order to ensure the effective implementation of the “Asset Freezing Regime” and to raise the awareness of the sectors about the responsibilities and obligations of the relevant laws, *GIF* being the Secretariat of the Commission provided a total of 2 training sessions to the banking sector, 1 of which was conducted online in response to epidemic prevention considerations, targeting at all banks in Macao SAR. The above-mentioned trainings recorded a total attendance of about 1,000 and the relevant promotional work will be continued on an ongoing basis to further strengthen the sector’s understanding of the “Asset Freezing Regime”.



The 15th Asset Freezing Coordination Commission Meeting

○ 3.4 Participation of International Bodies Activities

ML and TF crimes never confine themselves to the border of a jurisdiction and always involve international movements of funds. As such, different international organizations foster cooperation and compliance globally with the internationally recognized standards in AML/CFT, in particular the 40 Recommendations of FATF. Macao SAR joined the APG in 2001 and *GIF* joined the Egmont Group in 2009. As a member, Macao SAR has been proactively enhancing its AML/CFT efforts through the participation in the meetings as well as the assessment missions of member jurisdictions. These commitments not only fulfill the obligations of the Macao SAR being a member of the international organization, but also enhance the international status of the Macao SAR.

※ 3.4.1 Chairing of APG ME Committee ※

Since September 2013, *GIF* sent one representative to serve as one of the Co-Chairs of the APG Mutual Evaluation Working Group. The representative of *GIF* was supported by all member jurisdictions during the APG Annual Meeting in July 2022 to continue as Co-Chair of the Mutual Evaluation Committee (MEC) and renewed a 3-year term until 2025. The core function of the MEC is that it supports the 3rd round ME, and provides training to prospective assessors on FATF international standards and assessment procedures. In addition, MEC discusses the Mutual Evaluation Report (MER) and follow-up report of the assessed jurisdiction according to procedures with each member in the APG annual meeting, makes recommendations to members concerning some key issues to ensure the quality and consistency of ME and follow-up procedures. During 2022, the representative of *GIF* participated in or chaired a total of 4 MEC virtual meetings on behalf of the Macao SAR.

※ 3.4.2 Participation in ME of Other APG Member Jurisdictions ※

Being a member of APG, Macao SAR is obliged to nominate appropriate experts to assist APG in the ME assessment. In 2022, 2 representatives from *GIF* have taken up the assessor role in the ME of 2 member jurisdictions. In addition, 1 representative from *GIF* have been nominated to take up the assessor role for another member jurisdiction, however, the assessment was rescheduled to 2023 due to the COVID-19 pandemic.

GIF and members of the Interdepartmental AML/CFT Working Group will continue to nominate representatives to participate in the APG Assessor Training workshops, and actively participate in ME assessment, in order to fulfill its duties as a member of an international organization.

※ 3.4.3 Macao SAR Being Represented as Co-Chair of Asia/Pacific Joint Group ※

Asia/Pacific Joint Group (APJG) is a regional sub-group of the International Cooperation Review Group (ICRG) which is responsible for establishing sanction and monitoring lists under the international AML organization, FATF. The APJG, which is composed of two Co-Chairs and other regional members, is mainly responsible for reviewing the listed members and following up their progress on AML/CFT. Since April 2020, Macao SAR being represented by *GIF* has served as one of the APJG Co-Chairs till the present, to coordinate and follow up the progress of the listed regional members, as well as to report regularly to the ICRG Co-Chairs who in turn report to the FATF members.

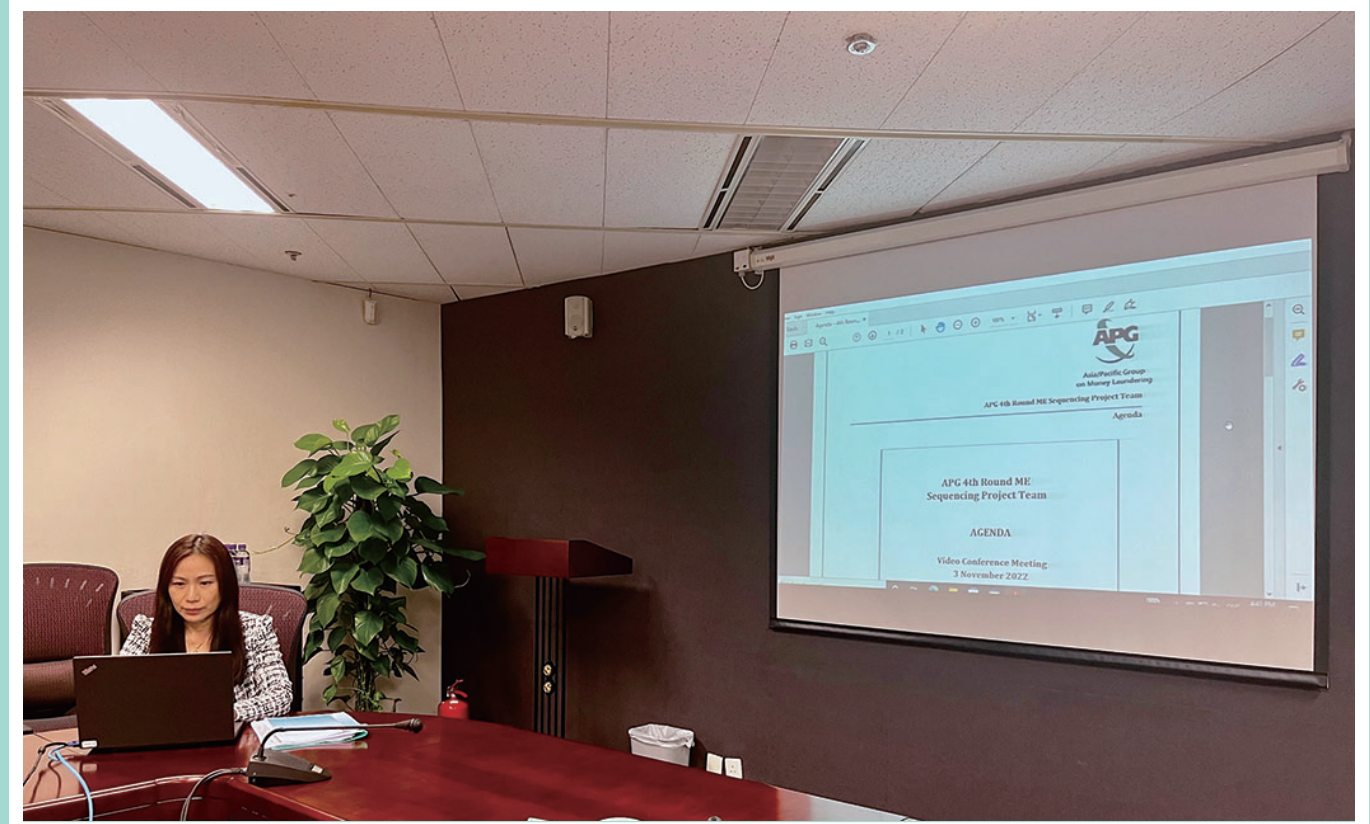
By the end of 2022, a total of 3 Asia/Pacific regional members were listed and the co-ordination work was shared by two Co-Chairs. Due to the border control measures implemented in response to the COVID-19 pandemic, the APJG meetings in the past year were conducted in hybrid format, where face-to-face and virtual meetings were conducted simultaneously. In 2022, *GIF* representatives have participated in or chaired over 40 virtual meetings, including face-to-face meetings to follow up on listed members, meetings with ICRG sub-group members, and FATF Plenary Meetings, etc.



Representative of *GIF* served as a mentor in the Assessor Training Workshop

※ 3.4.4 Macao SAR Being Represented to Participate in a Project Team of International Organization ※

The APG MEC agreed to establish a project team during the APG Annual Meeting in July 2022, with an aim to prepare options for the timetable and sequence of the 4th round of APG ME before the 2023 APG Annual Meeting, and to determine the first batch of APG member jurisdictions to be assessed in the next round. As always, *GIF* proactively nominated representative to participate in the project team, together with representatives from 5 other member jurisdictions, which aimed to assist in developing a sound and fair assessment schedule.



GIF participated in the project team of International Organization

○ 3.5 International Cooperation

In 2022, Macao SAR was severely affected by COVID-19 pandemic, technologies become more essential to people's daily life. Although the application of technologies can facilitate people's livelihood and maintain their basic daily needs without leaving home, it may also be exploited by criminals to commit crimes and forms a new trend of cybercrime. Given the cross-border nature of cybercrime, criminals can use technology to quickly transfer the proceeds of crime, thereby increasing the difficulty of investigations. *GIF* understands that international cooperation is the key to success in the prevention and suppression of ML and TF, therefore, *GIF* keeps on establishing cooperation and financial intelligence exchange channels to foster cooperation with overseas Financial Intelligence Units (FIUs) so as to prevent and suppress ML and TF activities more effectively.

GIF has been proactively seeking the opportunities of signing Memoranda of Understanding (MOU) with overseas FIUs of “The Belt and Road Initiative” countries and jurisdictions. Up to 2022, there were 29 foreign jurisdictions established an information exchange mechanism under the format of MOU with GIF.

The following table indicates the statistics on information exchange between GIF and foreign counterparts during 2022:

Table 4: Statistical Data of Information Exchange

2022	Number
Incoming Requests for Information	61
Outgoing Requests for Information	64
Intelligence Received	22
Intelligence Sent	34

Apart from intelligence exchanges with foreign counterparts, GIF also seeks opportunities to strengthen other forms of cooperation in AML/CFT with neighboring regions.

※ 3.5.1 GIF Participated in the Virtual “Hong Kong-Macao AML/CFT Experience Sharing Meeting” ※

GIF and the Hong Kong Joint Financial Intelligence Unit (HKJFIU) participated in the virtual “Hong Kong-Macao AML/CFT Experience Sharing Meeting” on 14th October 2022. The purpose of the meeting was to strengthen the AML cooperation mechanism between Hong Kong and Macao SAR. Topics for discussion mainly focused on the latest revision of AML/CFT legal framework in Hong Kong and Macao SAR, the overview of ML and TF risk assessment, recent trends of suspicious transactions with cross border nature and case sharing, etc.

Throughout the years, GIF worked closely with HKJFIU to share intelligence in relation to the suppression and prevention of ML and TF, in order to mitigate the ML/TF risks caused by the cross-border movement of illicit funds. GIF will continue to cooperate with HKJFIU to enhance the effectiveness of risk control in AML/CFT regime, so as to safeguard the integrity of the financial system of Macao SAR.



GIF participated in the virtual “Hong Kong-Macao AML/CFT Experience Sharing Meeting”



GIF participated in the virtual “Hong Kong-Macao AML/CFT Experience Sharing Meeting”

※ 3.5.2 China Anti-Money Laundering Monitoring and Analysis Center and *GIF* Organized the Online AML Seminar ※

To strengthen the AML cooperation mechanism and risk management between Mainland China and Macao SAR, *GIF* has frequent communications with AML departments in Mainland China. On 9 November 2022, the online AML Seminar was jointly held by *GIF* and China Anti-Money Laundering Monitoring and Analysis Center (CAMLMAC) to have an in-depth discussion on AML issues.

The seminar mainly focused on discussing the trend and analysis of cross-border suspicious transactions, proposing optimization plans for the effectiveness of financial intelligence exchanges as well as sharing the experience on AML/CFT issues. In order to maintain the healthy development of financial system in Macao SAR, *GIF* will continue to communicate and cooperate with the AML/CFT counterparts in Mainland China to mitigate the cross-border AML/CFT risk between Mainland China and Macao SAR and enhance the AML/CFT capabilities.



GIF and CAMLMAC organized the online AML Seminar



GIF and CAMLMAC had an in-depth discussion on AML issues

※ 3.5.3 *GIF* Participated in the “2nd LUJIAZUI National Financial Security Summit and the 12th China AML Seminar” ※

As AML is the core measures of preventing and suppressing all kinds of financial crimes, research on the causes and development trends of ML crimes has become an important cornerstone of financial stability and economic development in Mainland China. Thus, “LUJIAZUI Financial Security Institute” in Pudong, Shanghai and “China Centre for Anti-Money Laundering Studies Fudan University” (CCAMLS) jointly held the “2nd LUJIAZUI National Financial Security Summit and the 12th China AML Seminar”.

The seminar mainly focused on discussing “Financial Security and Stability and Growth of Macro Economy”, “Systemically Important Financial Institutions and AML Innovation”, “ML Risk and Governance of Virtual Assets”, “Difficulties of AML and Application of Blockchain Technology”, “Key Points, Difficulties and Solutions of Countering Proliferation Financing (CPF) Monitoring” and “Information Transparency, Privacy Protection and Data Governance”. The Director of *GIF* was invited to participate in this summit and to deliver a speech online in which *GIF* communicated and interacted with CAMLMAC and experts of the same field in Mainland China to improve the effectiveness of AML risk prevention between Mainland China and Macao SAR.



The Director of *GIF* delivered online speech at the “2nd LUJIAZUI National Financial Security Summit and the 12th China AML Seminar”

3.6 Attending International Conferences

As a responsible member of international organization, *GIF* proactively participated in international conferences and the assessment missions of member jurisdictions. The international conferences participated in 2022 are as follows:

Table 5: List of International Conferences

Quarters	Conferences	Venues
1 st Quarter	Egmont Group and Regional FIU Meeting	<i>GIF</i> Meeting Room (Virtual meeting)
	FATF Plenary Meeting	
	APG MEC Meeting	
2 nd Quarter	APG Ad Hoc Committee on the FATF Strategic Review	<i>GIF</i> Meeting Room (Virtual meeting)
	FATF Plenary Meeting	
	APG MEC Meeting	
3 rd Quarter	APG Annual Meeting including Technical Assistance and Training sessions	<i>GIF</i> Meeting Room (Virtual meeting)
4 th Quarter	Joint Egmont Group and World Customs Organization Meeting	<i>GIF</i> Meeting Room (Virtual meeting)
	APG MEC Meeting	
	FATF Plenary Meeting	
	APG MEC 4 th Round Project Group Meeting	
	Egmont Group - Middle East and North Africa and Asia and Pacific Regional Group Seminar	
	Egmont Group Head of FIU Meeting	



APG Annual Meeting including Technical Assistance and Training sessions

○ 3.7 Local Cooperation

※ 3.7.1 Cooperation among Judicial Authorities and Government Agencies ※

Information sharing and collaboration is fundamental to *GIF*'s operations. Maintaining effective partnerships with all the relevant judicial authorities and government agencies has been a cornerstone of *GIF*'s work. Partnerships and collaboration continued to be crucial to the success of cross-agency task forces in the past year to achieve the objective of fighting ML/TF. During 2022, the meetings listed below were held among legal departments, supervisory agencies and LEAs:

Judicial Authorities and LEAs

- A meeting was held with *SA* in January to share information on the latest trend of STRs, and to discuss the implementation on cross border cash declaration and the follow-up actions.
- A meeting with the Court, *MP*, *CCAC* and *PJ* was held in June, which was the 3rd meeting of the working group of central coordination mechanism and asset recovery mechanism.
- Meeting were held with *CCAC* and *PJ* in November respectively to discuss the threat analysis report in relation to the 3rd round of Macao SAR ML/TF/PF Risk Assessment.

Supervisory Agencies

- Bilateral meetings were held with *AMCM* in January and November to discuss the AML/CFT activities, the latest status of virtual assets (VAs) and virtual asset service providers (VASPs) and its risk assessment, STR typologies and trends, regional cooperation of AML/CFT in Guangdong-Macao In-Depth Cooperation Zone in Hengqin, the legislative progress on the Trust Law, and the preparation of 3rd APG Follow-Up Report, etc.

Other Departments

- A meeting was held with Macao Lawyers Association in July to discuss the latest developments in the legal professional sector and the distribution arrangement of sector questionnaires for the 3rd round of Macao SAR ML/TF/PF Risk Assessment, etc.

Asset Freezing Coordination Commission

- A meeting was held in November, which was the 15th meeting of the Asset Freezing Coordination Commission.

Interdepartmental Risk Assessment Meeting

- Meetings with AML Working Group were held in February and December to discuss the AML/CFT/CPF Action Plan in 2022, the progress on the 3rd round of Macao SAR ML/TF/PF Risk Assessment, the latest status of next round FATF/APG ME, the legal issues of VAs and VASPs, contents from training courses on VASPs and other relevant matters held by international organizations, and other trainings organized and planned by *GIF* in 2022 were also discussed in the meetings.

※ 3.7.2 “Joint Meeting on Prevention and Suppression of Financial Crimes” ※

In response to complex and ever-changing financial crime transactions, *GIF* persists to attach great importance to connecting with various domestic sectors and exchanging expertise and communicate with the different sectors through various channels, in which a cooperation mechanism in the form of Public Private Partnership was established in 2018. The scope of industry participation of the “Joint Meeting on Prevention and Suppression of Financial Crimes” was gradually expanded to enhance the effectiveness on the prevention and suppression of ML and TF.

The “Joint Meeting on Prevention and Suppression of Financial Crimes” for banking sector and gaming sector had been held on 7th September and 28th September 2022 respectively via online platform and there were 230 representatives altogether. The former participants included compliance officers and representatives from compliance department of banking sector, the latter invited the compliance officers and representatives from compliance department of all the gaming concessionaires in Macau, as well as the representatives from compliance and audit department of *DICJ*. During the meeting, representatives from *GIF* discussed the AML/CFT statistical data in Macao SAR, the latest suspicious transaction trends and case sharing. A newly established electronic communication platform was also introduced in order to enhance the communication mechanism between *GIF* and the banking sector.

The “Joint Meeting on Prevention and Suppression of Financial Crimes” had fruitful results. Participants agreed that public services and private sectors should strengthen cooperation to enhance AML/CFT preventive measures. *GIF* will spare no effort to build and maintain an effective public private partnership to improve the risk prevention capabilities and work together to prevent and suppress financial crimes.

Table 6: “Joint Meeting on Prevention and Suppression of Financial Crimes”

Sectors	Attendance
Banking Sector	170
Gaming Sector	60



“The 9th Joint Meeting on Prevention and Suppression of Financial Crimes”



“Joint Meeting on Prevention and Suppression of Financial Crimes”
for gaming sector

○ 3.8 Public Awareness Program

GIF continued to raise public awareness on AML/CFT through publications and trainings. Despite the impact of COVID-19 pandemic in 2022, *GIF* still tried to organize series of public awareness programs for different sectors and public while abiding by the COVID-19 preventive measures. Those programs included trainings or online trainings tailored to different stakeholders, the publication of newsletters and annual reports, promotional videos, as well as the website and WeChat Official Account with updates on AML/CFT issues accessible to the public.

GIF will continue to conduct different types of public awareness programs in order to deliver AML/CFT knowledge to the public and other practitioners, for the betterment of economic environment and development for Macao SAR.

※ 3.8.1 Local Training for *GIF* Staff and Staff of Other Government Agencies ※

In 2022, 12 training sessions had been attended by staff of *GIF* and members of the Interdepartmental AML/CFT Working Group. In addition, staff of *GIF* visited the “National Security Education Exhibition” in April 2022 that was jointly held by Macao SAR Government and the Liaison Office of the Central People’s Government in the Macao SAR, which provided *GIF* staff with a better understanding of the concept of overall national security.



Staff of *GIF* visited the “National Security Education Exhibition”



Staff of *GIF* visited the “National Security Education Exhibition”

Table 7: List of Local Trainings and Seminars

Quarters	Topics of Training/Seminars	Organizers
1 st Quarter	Seminar on “Trust Theory and Practice”	Macao Financial Law Association
2 nd Quarter	APG Webinar: 1. Risk Assessments and Supervisory Issues 2. Virtual Standards Training 3. VA / VASPs	APG
	Financial Investigative Techniques Course	Egmont Group
3 rd Quarter	APG Assessor Training	APG
	FATF Webinar on Beneficial Ownership Transparency of Legal Persons	FATF
4 th Quarter	Guangdong-Macao In-Depth Cooperation Zone in Hengqin – Introduction of Financial Industry	Financial Development Bureau of Guangdong-Macao In-Depth Cooperation Zone in Hengqin
	2 nd LUJIAZUI National Financial Security Summit and the 12 th China AML Seminar	LUJIAZUI Financial Security Institute and CCAMLS
	Cybersecurity Awareness Training	PwC Macao
	APG Webinar on VA and VASP	APG
	APG Webinar on FIU Perspectives on CFT	APG



APG Webinar on VA and VASPs



Cybersecurity Awareness Training

※ 3.8.2 Training for Government Agencies and Private Sector ※

Raising the awareness of supervisory agencies and reporting entities on their AML/CFT obligations is always crucial to the functions of *GIF*. During 2022, the following online/face-to-face training sessions had been conducted for the management, compliance departments and the front-line staff of various sectors as well as the educational institutions. Details are as follows:

Table 8: List of Trainings and Seminars Organized by *GIF*

Sectoral training – Total number of participants: around 1,120

Sectors	Training Target	Attendance
Financial Sector	Financial Institutions	1,000
	Insurance Agents	100
Real Estate Sector	Real Estate Agents	20



GIF provided online AML/CFT seminar for banking sector



GIF provided online seminars on “Asset Freezing Regime” for banking sector



GIF provided online AML/CFT seminar for real estate sector



GIF provided online AML/CFT seminar for insurance sector

Individual training – Total number of participants: around 150

Industries	Training Target	Attendance
Financial Institutions	Industrial and Commercial Bank of China (Macau) Limited (ICBC)	50
	Macao Central Securities Depository and Clearing Limited (MCSD)	30
Educational Institutions	Students of Macao Polytechnic University	70



GIF provided AML/CFT seminar to MCSD



Promotion of prevention of ML to juveniles - Macao Polytechnic University



GIF provided AML/CFT training to ICBC

○ 3.9 Courtesy Visit from/to Other Entities

In 2022, *GIF* continued to receive courtesy visits from different financial institutions and private sectors. Through these visits, *GIF* introduced the AML/CFT related works conducted by the Macao SAR government, the trends, typologies of STRs and related financial knowledge, and to catch up on the latest market development of new products and services, so as to consider the ML/TF risks involved and enhance the relevant AML/CFT preventive measures when necessary, with the aim to elevate the effectiveness of AML/CFT in Macao SAR. Details are as follows:

Table 9: List of Courtesy Visits

Quarters	Organizations	Topics	Venue
1 st Quarter	KPMG	Courtesy Visit	GIF
	Bank of Communications Company Limited, Macao Branch	Courtesy Visit	
4 th Quarter	MCSD	To understand the business operations and internal control measures of AML/CFT	GIF
	Global Remittances Company Limited		AMCM



Representatives of KPMG visited GIF



Representatives of Bank of Communications Company Limited, Macao Branch visited GIF



Representatives of MCSD visited GIF

CHAPTER IV - ADMINISTRATION

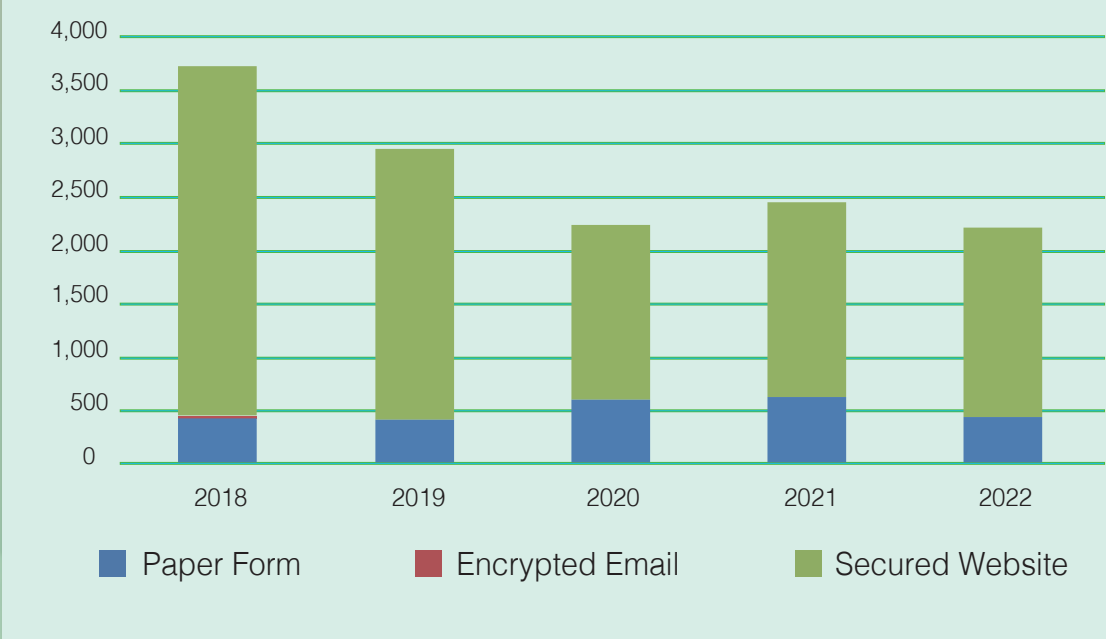
4.1 Means of STR Submission

GIF has launched the Online STR Reporting System (secured website) over 10 years. Through this secured and efficient way to submit STR, paper consumption can be reduced and hence, it is more environmentally friendly. The table below shows the utilization rate of using different methods of STRs submission in the past 5 years.

Table 10: Statistical Data for the Methods of STRs Submission

Methods of Submission	Number of STRs									
	2018	%	2019	%	2020	%	2021	%	2022	%
Paper Form	407	11.0%	401	13.6%	583	26.2%	613	25.2%	424	19.3%
Encrypted Email	29	0.8 %	0	0%	0	0%	0	0%	0	0%
Secured Website	3,280	88.2%	2,540	86.4%	1,641	73.8%	1,822	74.8%	1,775	80.7%
Total	3,716	100%	2,941	100%	2,224	100%	2,435	100%	2,199	100%

Chart 3 : Statistical Data for the Methods of STRs Submissionin in 2018 to 2022



From the data above, secured website is the main methods of submission of STRs in 2022. A total of 1,775 STRs were submitted through secured website, which accounted for 80.7% of the total submission rate. Out of these 1,775 STRs, 1,176 STRs were submitted by the gaming sector, while 599 STRs were submitted by the financial sector. As the Online STR Reporting System has been widely used, *GIF* will continue to optimize the functions of the system to facilitate users while reducing network security risks.

4.2 Ongoing Enhancements in Information System and Cybersecurity Infrastructure

Despite the ongoing impact of the COVID-19 pandemic in 2022, the Macao SAR remains resolute in its efforts to combat ML and TF through robust AML/CFT measures. The pandemic has adversely affected the financial sector, but the Macao SAR government continues to prioritize strengthening information sharing and cooperation with other jurisdictions and different industries. To this end, the Macao SAR's FIU, *GIF*, implemented several initiatives in 2022 to optimize information exchange mechanisms and enhance communication with the public and private sectors. These initiatives include improving the efficiency of AML/CFT intelligence gathering and case correlation, establishing an online communication platform, revamping the departmental website, and continuously upgrading the IT infrastructure. Furthermore, the Macao SAR remains vigilant against cyber threats and strictly adheres to Macao cybersecurity policy.

In the past, intelligence analysts from *GIF* had to spend a significant amount of time on repetitive work in the information gathering process and case correlation analysis. In order to optimize the analysis process, *GIF* leveraged process automation technology. Even though *GIF* analysts faced various data sources and information channels, the process automation technology can effectively handle a large amount of time-consuming and highly repetitive information gathering process and case correlation analysis, allowing analysts to allocate more time to complex intelligence analysis work. Eventually, the ability of intelligence analysis in AML/CFT is gradually improved.

To enhance the efficiency of information exchange with the banking industry, *GIF* introduced an online communication platform for document dispatching processes in the 3rd quarter of 2022. By using the online communication platform, the document dispatching process becomes more flexible, efficient, and less affected by external factors, thereby promoting *GIFs* progress in e-government. Currently, the online communication platform has provided services to the banking industry, and in the near future, the platform will be available to other industries as appropriate.

In early 2022, *GIF* launched a newly designed departmental website, which simplifies the news and announcements update process, and enhances the immediacy and effectiveness of information dissemination. The website features a professional and concise design that follows the Macao SAR in e-government's direction promoting "Ease-to-use and convenient services", making it easier for the industry and public sector to access the latest news or relevant information of AML/CFT.

In response to the ever-changing global IT environment and the increasing complexity of cyberattacks, people are the essential key to the success of building and maintaining network security. Therefore, *GIF* continues to invite security experts to provide user security awareness training for office personnel. By understanding the latest security trends, users can be aware of the risks and trends in network security that the Macao SAR is currently facing, and review the precautions for protecting personal and office data security, together maintaining a secure network for the Macao SAR. In addition, *GIFs* IT team will continue to review the infrastructure of internal network security equipment and allocate appropriate resources for updating and optimizing related hardware and software systems based on the security risk assessment.

In the future, *GIFs* IT team will continue to leverage IT to assist, improve, and optimize the AML/CFT processes according to business needs, make intelligence analysis work more efficient and accurate, and further enhance overall departmental functional effectiveness.

APPENDIX – GLOSSARY

AMCM	Monetary Authority of Macao (<i>Autoridade Monetária de Macau</i>)
AML/CFT/CPF	Anti-Money Laundering / Combating the Financing of Terrorism / Countering Proliferation Financing
APG	Asia / Pacific Group on Money Laundering
APJG	Asia / Pacific Joint Group
ATM	Automated Teller Machine
CAMLMAC	China Anti-Money Laundering Monitoring and Analysis Center
CCAC	Commission Against Corruption (<i>Comissariado contra a Corrupção</i>)
CCAMLS	China Centre for Anti-Money Laundering Studies Fudan University
CDM	Cash Deposit Machine
CIEPDSS	Independent Committee for the Exercise of Disciplinary Power over Solicitors (<i>Comissão Independente para o Exercício do Poder Disciplinar sobre os Solicitadores</i>)
CPSP	Public Security Force (<i>Corpo de Polícia de Segurança Pública</i>)
DICJ	Gaming Inspection and Coordination Bureau (<i>Direcção de Inspecção e Coordenação de Jogos</i>)
DNFBPs	Designated Non-Financial Businesses and Professions
DSAJ	Legal Affairs Bureau (<i>Direcção dos Serviços de Assuntos de Justiça</i>)
DSEDT	Economic and Technological Development Bureau (<i>Direcção dos Serviços de Economia e Desenvolvimento Tecnológico</i>)
DSF	Financial Services Bureau (<i>Direcção dos Serviços de Finanças</i>)
FATF	Financial Action Task Force
FIUs	Financial Intelligence Units
<i>GIF</i>	Financial Intelligence Office (<i>Gabinete de Informação Financeira</i>)
HKJFIU	Hong Kong Joint Financial Intelligence Unit
ICRG	International Cooperation Review Group
IH	Housing Bureau (<i>Instituto de Habitação</i>)
IT	Information Technology
LEAs	Law Enforcement Agencies
Macao SAR	Macao Special Administrative Region

MCSD	Macao Central Securities Depository and Clearing Limited
ME	Mutual Evaluation
MEC	Mutual Evaluation Committee
MER	Mutual Evaluation Report
ML	Money Laundering
MOU	Memoranda of Understanding
MP	Public Prosecutions Office (<i>Ministério Público</i>)
PF	Proliferation Financing
PJ	Judiciary Police (<i>Polícia Judiciária</i>)
SA	Macao Customs Services (<i>Serviços de Alfândega</i>)
SPU	Unitary Police Services (<i>Serviços de Polícia Unitários</i>)
STRs	Suspicious Transaction Reports
TF	Terrorist Financing
VA	Virtual Asset
VASPs	Virtual Asset Service Providers



金融情報辦公室
Gabinete de Informação Financeira
Financial Intelligence Office

澳門蘇亞利斯博士大馬路 307-323 號中國銀行大廈22樓
Avenida Dr. Mário Soares, Nos. 307-323, Edif. Banco da China, 22º andar, Macau

電話 Tel : (853) 2852 3666
電郵 E-mail: info@gif.gov.mo

傳真 Fax : (853) 2852 3777
網址 Website: www.gif.gov.mo

官方微信號：澳門金情辦 GIFMacao

