

警察總局 SERVIÇOS DE POLÍCIA UNITÁRIOS

金融情報辦公室 Gabinete de Informação Financeira

年報 Relatório Anual Annual Report





2024

TABLE OF CONTENTS

DIRECTOR	'S MES	SSAGE1
Year 2024		k Overview of the Financial Information Analysis Team of
CHAPTER	ī	BACKGROUND AND ORGANIZATION STRUCTURE3
	1.1	Organization Background of GIF of SPU3
	1.2	GIF's Organization Structure and Functions4
	1.3	Duties of GIF7
CHAPTER	п	TREND AND DEVELOPMENT OF STRS9
	2.1	Statistical Data9
	2.2	Statistics on Recent Trends of Suspicious Transactions11
Year 2024		sk Overview of the Studies and Institutional Cooperation am of GIFB1-B2
CHAPTER	Ш	COORDINATION OF AML/CFT/CPF WORK IN MACAO SAR
	3.1	Coordination of the Interdepartmental AML/CFT Working Group13
		3.1.1 Interdepartmental Coordination14
		3.1.2 Strategic Analysis 15
	3.2	ML/TF/PF Risk Assessment of the Macao SAR16
	3.3	Coordination of the Asset Freezing Coordination Commission18
	3.4	Participation of International Bodies Activities20
		3.4.1 Macao SAR being Represented as Co-Chair of APJG21

		3.4.2	Chairing of APG Mutual Evaluation Committee2	. 1
		3.4.3	Participation in ME of Other APG Member Jurisdictions 2	23
	3.5	Intern	ational and Regional Cooperation2	
		3.5.1	The 5 th AML Tripartite Meeting (Mainland China, Hong Kong SAR and Macao SAR) 2	27
		3.5.2	GIF Visited the Financial Intelligence and Investigation Bureau of the Hong Kong Police Force2	28
		3.5.3	GIF Visits and Exchanges with Counterparts in the	
			Mainland2	29
	3.6	Attend	ding International Conferences3	31
	3.7	Local (Cooperation3	6
		3.7.1	Cooperation among Government Agencies3	6
		3.7.2	"Joint Meeting on Prevention and Suppression of	
			Financial Crimes"3	8
	3.8	Public	Awareness Program3	39
		3.8.1	Local Trainings Attended by GIF Staff as Presenter	
			and /or Participants4	0
		3.8.2	Trainings for Government Agencies and Private Sector	
			4	.3
		3.8.3	The 2 nd "Outstanding STR Case Award" and "AML Knowledge Contest" held by GIF 4	9
	3.9	Courte	esy Visit from/to Other Entities5	51
CHAPTER	IV	ADMI	INISTRATION5	3
	4.1	Means	s of STR Submission5	3
	4.2	_	ng Enhancement of Information Systems and Network ty Construction5	4
APPENDIX	- GLO	OSSARY	/ 5	5

2024 marked a significant milestone for the Financial Intelligence Office (GIF) of the Unitary Police Service (SPU). Following its formal integration into SPU on 1 February 2024, GIF operates as an organic unit with technical and operational independence. Within the SPU organizational structure. GIF aims to have stronger ties with law enforcement agencies (LEAs) to further enhance joint collaboration mechanisms and intelligence analysis, to achieve greater effectiveness in combating financial crimes and safeguard financial security and stability of the Macao Special Administrative Region (Macao SAR). The operational independence of GIF ensures that membership of Asia/Pacific Group on Money Laundering (APG) and the Egmont Group were not affected. GIF continues to fulfil obligations within these international anti-money laundering (AML) organizations, laying a solid foundation for a more efficient global financial security network. This restructuring aligns with the policy objective of "Streamlining Administration" of the Macao SAR Government, to consolidate resources and intelligence networks in order to enhance the prevention capabilities on cross-border financial crimes.

The economy of Macao SAR demonstrated remarkable resilience in 2024. Annual gross domestic product (GDP) recovered to 86.4% of the 2019 level. Service exports increased by 9.2%, driven by recovery of the tourism sector. With this economic recovery, GIF received a record-high 5,245 suspicious transaction reports (STRs), representing a substantial 13.7% year-on-year increase. In addition, a steady upward trend in money laundering cases investigated and prosecuted by judicial authorities in recent years also reflected the commitment and determination of the Macao SAR Government to curb spread financial crimes. These figures not only indicated the regulatory challenges from the dynamism of local economic activities, but also the high level of trust from reporting entities in GIF's professionalism. Even with the restructuring of GIF, the STRs received maintained double-digit growth, which reflects the compliance level and risk sensitivity are further strengthened among practitioners in different sectors of Macao SAR.

Regarding the key tasks of the year, GIF focused on sector risk prevention and monitoring in the first half of 2024. In collaboration with supervisory agencies of Macao SAR, GIF jointly organized outreach program of risk assessment report to different sectors. These explanatory sessions provided in-depth analysis of the "Macao SAR Risk Assessment Report on Money Laundering (ML)/Terrorist Financing (TF)/Financing of Proliferation of Weapons of Mass Destruction (PF)", enhance the understanding of relevant risks for financial/insurance institutions, gaming concessionaires, and other institutions and service providers from various sectors. In the second half of 2024, GIF organized meetings with regulatory bodies and counterparts in the Guangdong-Hong Kong-Macao Greater Bay Area and neighboring regions, aiming to enhance regional cooperation to fight against cross-border ML/TF/PF crimes.

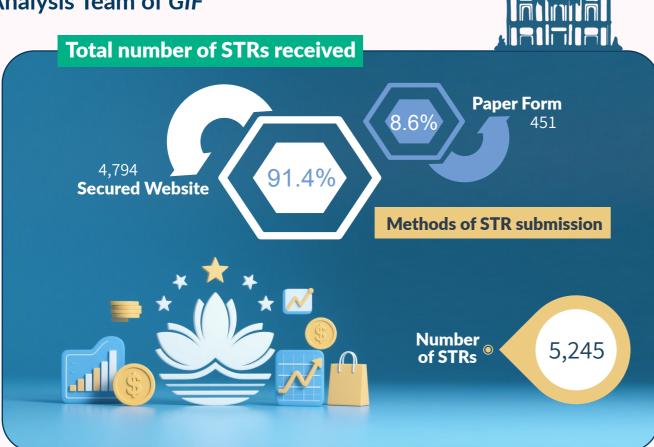
Looking ahead to 2025, with global economic slowdown, supply chain restructuring, and complicated geopolitical conditions, GIF will unwaveringly implement its mandate under the leadership of the Secretary for Security and the Commissioner-General of SPU. GIF upholds the policy objective from the Secretary for Security — "Courage to Take Responsibility, Daring to Innovate, and Capable of Implementation" — while maintain the mindset to proactively respond to risk. GIF will adopt a high-level perspective to strengthen the overall anti-money laundering/countering the financing of terrorism/combating the financing of proliferation of weapons of mass destruction (AML/CFT/CPF) regime and establish mechanisms for preventing and mitigating financial risks, with an aim to build a solid financial security shield, contributing to the success of the "One Country, Two Systems" principle.

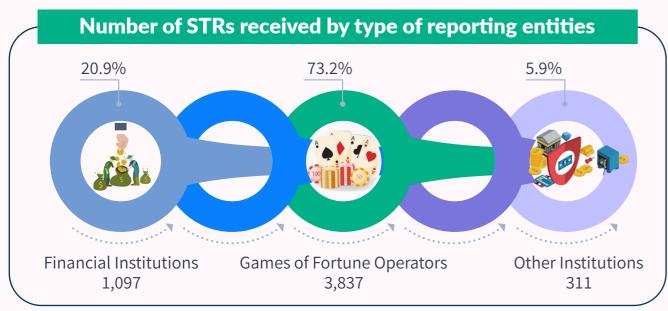


Director of GIF of SPU Chu Un I, Connie

Year 2024

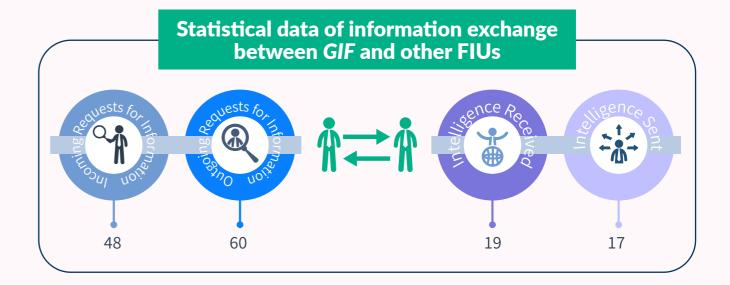
Task Overview of the Financial Information Analysis Team of *GIF*

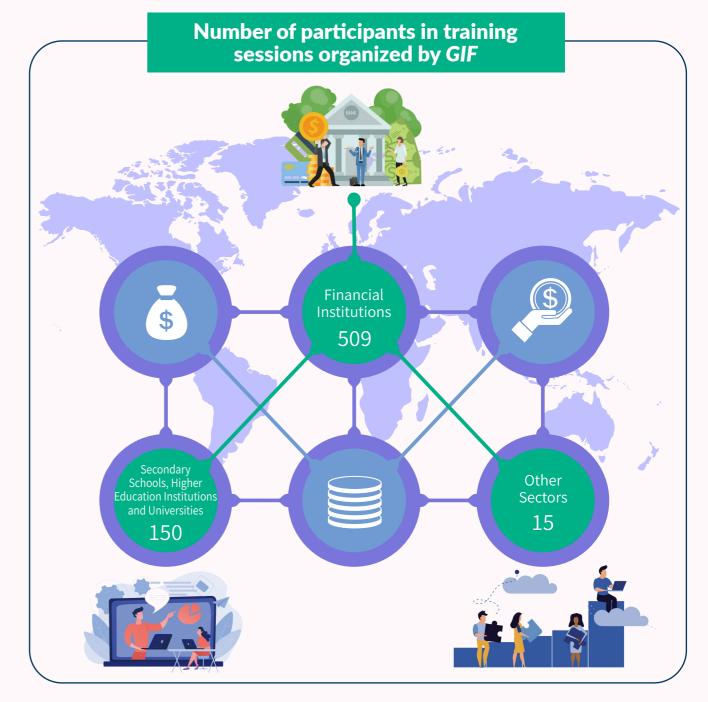




STRs disseminated to MP in 2024







A-1 A-2

1.1 Organization Background of GIF of SPU

The former GIF was established on 8 August 2006 with the role of collecting, analyzing and disseminating information on suspicious transactions of ML and TF, as well as 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".

BACKGROUND AND ORGANIZATION STRUCTURE

To align with the Macao SAR Government's policy objective of "Streamlining administration", to promote administrative reform and to further strengthen cooperation between GIF and the LEAs, with a view to achieve greater effectiveness in the prevention and combating of crimes related to ML, TF and PF. The Macao SAR government integrated the former GIF (Project Team) into SPU by amending the Law and Administrative Regulation.

On 1 February 2024, Law no. 1/2001 "The Unitary Police Service of the Macao Special Administrative Region", as amended by Law no. 23/2023, entered into force, giving SPU the attributions and competences to participate in the prevention and combating of crimes related to money laundering, terrorist financing and proliferation financing of weapons of mass destruction. On the same day, Administrative Regulation no. 5/2009 "Organization and Operation of the Unitary Police Service", as amended by Administrative Regulation no. 3/2024, entered into force, formally integrating the former GIF into the organizational structure of SPU. GIF of SPU, as an organic unit with technical and operational independence, is established within SPU to ensure that the membership of the Macao SAR in international organizations is not affected and that it continues to perform its statutory functions.







BACKGROUND AND ORGANIZATION STRUCTURE

GIF's Organization Structure and Functions



GIF is an administrative-type financial intelligence unit which is responsible for preventing and combating crimes of ML, TF and PF. In exercising such duties, in accordance with the Article 10-A of the Administrative Regulation no. 5/2009 "Organization and Operation of the Unitary Police Service" in force, GIF is mainly vested with the following specific competences:

- To centralize the collection, analysis and dissemination of information on suspected ML, TF and PF crimes, or involving suspicious or high-risk transactions;
- To create and maintain updated databases for the above-mentioned information;
- To provide and receive information related to ML, TF and PF crimes to/from entities outside of the Macao SAR, in compliance with inter-regional agreements or other international legal instruments;
- To analyze the information collected and report the suspicious ML, TF and PF activities to the Public Prosecutions Office (MP);
- To provide assistance to judicial authorities, LEAs, and other competent authorities empowered to prevent and combat ML, TF and PF crimes, in response to their requests with valid reasons, particularly the provision of information and professional technical support, as well as providing intelligence to the mentioned authorities spontaneously;
- To collaborate in the preparation and revision of guidelines for preventing and combating the crimes of ML, TF and PF, with the public authorities or entities responsible for issuance of guidelines;
- To develop and promote outreach programs to educate the general public on topics related to the prevention and combating crimes of ML, TF and PF;
- To review the effectiveness of the prevention and combating crimes of ML, TF and PF for the Macao SAR, and to propose recommendations to the Macao SAR for reinforcement of the relevant legal and institutional framework;
- To take responsibility to provide secretarial services to the Asset Freezing Coordination Commission established by Article 5 of Law no. 6/2016 "Asset Freezing Regime"; and
- To prepare an annual report on the activities of GIF for submission to the Commissioner-General of SPU, and publish it.

1.3 Duties of GIF

The Director takes on the leadership, coordination and management responsibilities so as to exercise the competences stipulated in Article 10-B of the Administrative Regulation no. 5/2009 "Organization and Operation of the Unitary Police Service" in force.

In accordance with Article 2 of the "Internal Regulation of the Financial Intelligence Office" which was approved by the Order of the Secretary for Security no. 6/2024, GIF is headed by a Director who is assisted by a Deputy Director, and is comprised of the Financial Information Analysis Team, the Studies and Institutional Cooperation Team and the Information Technology Support Team. These teams carry out their duties by following the competences granted by Article 4 to 6 of the above-mentioned order, the main responsibilities of the teams are as follows:

The Financial Information Analysis Team

- ➤ To centralize information by collecting and analyzing of suspicious activities submitted by the reporting entities and verify the information received;
- ➤ To request additional information or information involving suspicious or high-risk transactions from the reporting entities in case of need or with a view to a more in-depth analysis,
- ➤ To propose the referral of participation of operations that give rise to the suspicion of practice of crimes related to ML, TF and PF to the MP;
- ➤ To provide support to judicial authorities and LEAs, as well as other competent authorities in the context of preventing and combating crimes of ML, TF and PF, particularly through the provision of intelligence which is relevant for the purposes of criminal investigations or supervisory monitoring inspections;
- To prepare strategic analysis reports on the typologies of transactions and trends of the crimes related to ML, TF and PF; and
- ➤ To collaborate with the Studies and Institutional Cooperation Team in developing public awareness activities and operations related to the specific competences of GIF.

The Studies and Institutional Cooperation Team

- To conduct studies and present proposals regarding the improvement of the legal system of the Macao SAR in order to maintain its compliance with international standards regarding the prevention and combating of crimes related to ML, TF, and PF:
- ➤ To propose the establishment and maintenance of contacts with overseas counterparts and international organizations vested with competence for preventing and combating the crimes of ML, TF and PF;
- ➤ To promote and follow up on the signing and implementation of protocols, memorandums of understanding, interregional agreements or other international legal instruments to which the Macao SAR is a party;
- ➤ To support entities with competence for the prevention and combating crimes of ML, TF and PF, by providing professional technical support, particularly by promoting, guiding and coordinating the identification and conducting of sectorial risk assessments; and
- To promote outreach activities in the context of preventing and combating crimes of ML, TF and PF, coordinate the dissemination of information and the promotion of civic education.

The Information Technology Support Team

- ➤ To design, install, operate and maintain automated and computerized information processing systems that are most suitable for the rationalization of information channels and the performance of the attributions of GIF;
- ➤ To coordinate the establishment of the databases of GIF, follow up on the procurement procedures required for maintenance, and constantly update the data stored in the databases to ensure its confidentiality and security;
- To study, plan and pursue the adoption of new information technology to modernize and improve the efficiency of operations of GIF;
- ➤ To ensure the maintenance of application systems and databases, and assist the users to obtain necessary data required for the underlying activities, while ensuring the security and confidentiality of information and in accordance with the regulations of accessing information systems; and
- ▶ To develop and promote the internal and external information dissemination platform of GIF to enhance internal and external interaction.

After being integrated into SPU on 1 February 2024, GIF has been maintaining its competency to carry out its duties to perform statistics, trends and detailed case analysis of STRs in accordance with Article 10-A of Administrative Regulation no. 5/2009 in force. With Macao's economy recovering at a steady pace, GIF received 5,245 STRs in 2024, representing 13.7% increase as compared to 2023 and significantly increased by 78.3% as compared to pre-pandemic in 2019. This significant increase in STRs reflected that economic activities and commercial transactions were gradually back to normal level.

TREND AND DEVELOPMENT OF STRS

Table 1: The Total Number of STRs Received and Their Variances from 2019 to 2024

Year	Number of STR	Variance
2019	2,941	-20.9%
2020	2,224	-24.4%
2021	2,435	+9.5%
2022	2,199	-9.7%
2023	4,614	+109.8%
2024	5,245	+13.7%

Among all STRs received in 2024, the gaming sector submitted 3,837 reports, the financial sector submitted 1,097 reports, and other institutions submitted 311 reports, which accounted for 73.2%, 20.9% and 5.9% respectively. With the economic activities gradually returned to normal level in 2024, the number of STRs submitted by the financial sector increased by 23.7%, while the gaming sector and other institutions also increased by 11.8% and 5.1% respectively. Statistical information relating to the number of STRs received in 2024 is given in Table 2 and Chart 1.

Table 2: Statistical Data of STRs Received from 2019 to 2024

Reporting		Variance %					
Entity	2019	2020	2021	2022	2023	2024	(2023 Vs 2024)
Financial Institutions	880	677	793	765	887	1,097	+23.7%
Games of Fortune Operators	1,913	1,215	1,330	1,177	3,431	3,837	+11.8%
Other Institutions	148	332	312	257	296	311	+5.1%
Total	2,941	2,224	2,435	2,199	4,614	5,245	+13.7%

Chart 1: Number of STRs Filed by Sectors from 2019 to 2024



During 2024, GIF disseminated 142 STRs to MP, significantly increased by 22.4% as compared to 2023. Some cases were suspected to be related to fraud, where illicit proceeds were transferred and laundered through financial system in Macao.

2.2 Statistics on Recent Trends of Suspicious Transactions

"Chips conversion without/with minimal gambling activities" was the most common typology in 2024, standing at the top ranking in two consecutive years, in line with the dramatic increase in the number of STRs submitted by the gaming sectors in these two years. The typologies ranking from second to tenth have also increased as compared to 2023, with "Use of online banking/internet" increased the most. Such typology was commonly observed from STRs reported by financial institutions, reflecting the transfer of illicit proceeds through electronic means in financial system become more common. The top 10 most prevailing typologies (in terms of occurrence) in 2024 are given in Chart 2 and Table 3.



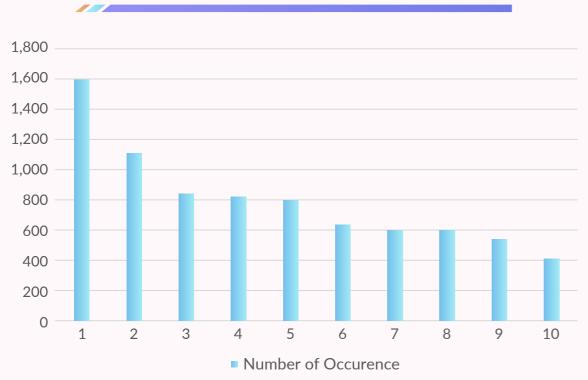


Table 3: Ranking of Statistics on Typologies of STRs (in order of occurrence)

	Typologies	Number of STRs
1	Chips conversion without/with gambling activities	1,596
2	Irregular large cash withdrawals	1,119
3	Related to other crimes	843
4	Currency exchanges / cash conversion	821
5	Significant cash deposit with non-verifiable source of funds	796
6	Use of ATM, phone banking, CDM	633
7	Chips conversion / marker redemption / gambling on behalf of third party(ies)	611
8	Use of cheques / promissory notes / account transfer etc. to transfer funds	599
9	Use of online banking / internet	555
10	Suspicious wire transfers	411
11	Others*	2,723

^{*}Other typologies include "Gambling activities (casino, horse racing, internet gambling etc.)", "Possible match with international Watch-list or other Black List", "Possible association with fraud cases" and "Attempted but unsuccessful transaction", etc.

Year 2024

Task Overview of the Studies and Institutional **Cooperation Team of GIF**

Number of FIUs that have signed a Memorandum of Understanding (MoU) with GIF (cumulative number over the years)



Number of international organization meetings chaired/ participated in by personnel holding international posts

33

Number of international meetings and training sessions attended

28

Participation in mutual evaluation works as assessors/reviewers

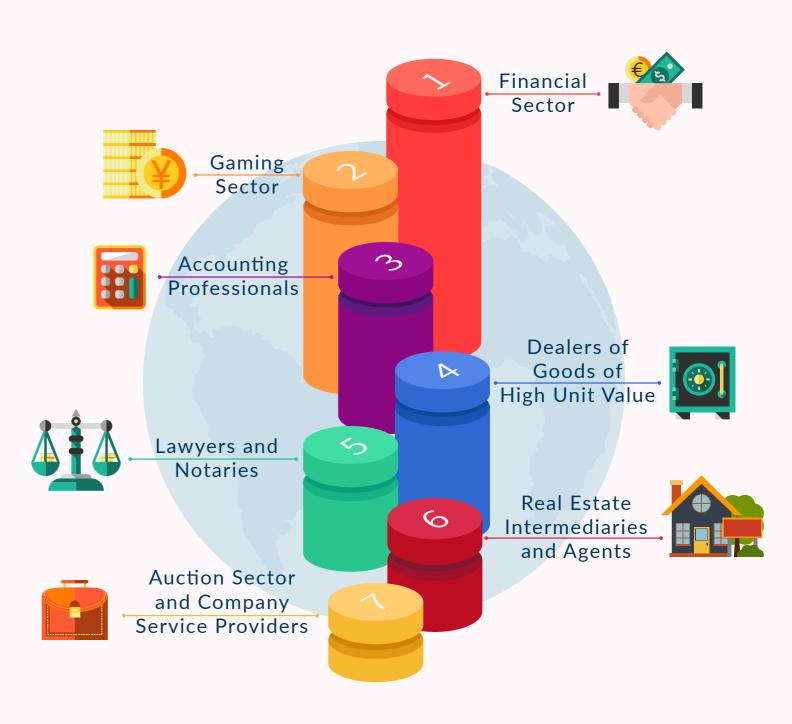
4 persons

Number of participants in training sessions organized by the Asset **Freezing Coordination Commission**

5 sessions with a total of approximately 450 participants

Explanatory sessions of Macao SAR Risk Assessment on ML/TF/PF

7 sessions with a total of approximately 900 participants



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:

- 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;
- Carrying out policy studies related to AML/CFT;
- Provision of AML/CFT training and public awareness programs to the economic sectors involved in the fight against ML and TF;
- Exchange of information on trends related to AML/CFT;
- Establishment of special sub-Working Groups whenever deemed necessary for the study of some particular AML/CFT issues, especially to coordinate in the risk assessment of ML and TF of Macao SAR.

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 13 different government agencies of supervisory, legal and law enforcement nature, including (in alphabetical order of Portuguese acronym):

- Monetary Authority of Macao (AMCM)
- Commission against Corruption (CCAC)
- Independent Committee for the Exercise of Disciplinary Power over Solicitors (CIEPDSS)
- Public Security Force (CPSP)
- Gaming Inspection and Coordination Bureau (DICJ)
- Legal Affairs Bureau (DSAJ)
- Economic and Technological Development Bureau (DSEDT)
- Financial Services Bureau (DSF)
- Housing Bureau (IH)
- (10) Public Prosecutions Office (MP)

- (11) Judiciary Police (PJ)
- (12) Macao Customs Service (SA) and
- (13) Financial Intelligence Office of Unitary Police Service (GIF) (coordinator).

3.1.1 Interdepartmental Coordination

During 2024, GIF organized 2 Interdepartmental AML/CFT Working Group meetings and 9 meetings with individual government or supervisory agencies, including AMCM, CCAC, DICJ, DSAJ, MP, PJ, SA, and 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 held seminars on "Asset Freezing Regime" to different sectors; (See Section 3.3) and
- Coordinate training activities for different judicial authorities and government agencies.



CHAPTER III

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:

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

These various strategic analysis reports cover the results from STR analysis as well as international AML/CFT/CPF 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/CPF 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/PF involved in different sectors.

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

In accordance with the requirement of the Financial Action Task Force (FATF) Recommendation 1, jurisdictions should identify and assess the ML/TF/PF risks, and use this assessment as a basis for allocating resources and implementing mitigation measures, and also regularly update their risk assessments to keep them up to date. In January 2024, GIF coordinated the members of the Interdepartmental AML/CFT Working Group to disseminate the latest "Macao Special Administrative Region Risk Assessment Report on Money Laundering/Terrorist Financing/Financing of Proliferation of Weapons of Mass Destruction" to different sectors.

In order to further enhance sectors' awareness and understanding of the risk assessment, GIF launched an outreach program in 2024 in collaboration with supervisory agencies, to jointly organize explanatory sessions to different sectors. From February to May 2024, a total of 7 explanatory sessions had been held covering all reporting entities with total participants of around 900 (including the financial sector, gaming sector, dealers of goods of high unit value, real estate intermediaries and agents, auction sector and company service providers, accounting professionals, lawyers and notaries).





GIF and DSEDT jointly organized explanatory sessions on risk assessment









GIF and supervisory agencies continued to jointly organize explanatory sessions on risk assessment

3.3 Coordination of the Asset Freezing Coordination Commission

The Asset Freezing Coordination Commission (hereafter as "the Commission") was established on 1 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. As the former GIF was formally integrated into SPU on 1 February 2024, the Commission, as amended by the Chief Executive Order no. 90/2024, comprised members agencies namely SPU (Coordinator), MP, SA, DSAJ, AMCM and PJ. In addition, under Subparagraph 12 of Paragraph 5 of Article 10-A of Administrative Regulation no. 5/2009 "Organization and Operation of the Unitary Police Service" in force, GIF's duties include providing secretarial services to the Commission.

From its establishment in 2016 to the end of 2024, the Commission has held 17 meetings in total to optimize the practical operational procedures of the "Asset Freezing Regime" in a timely manner, and has continued to conduct outreach programs for different sectors in order to enhance the awareness of reporting entities and improve the relevant notification mechanism.

The 17th meeting of the Commission was held in December 2024 and a total of 20 heads and delegates from Commission members participated. The main agenda items included updates on relevant United Nations Security Council Resolutions (UNSCRs), enquiries on the matching criteria in the "Sector Guidelines for Implementation of Asset Freezing Regime", the relevant scope of application of the recently enacted laws, as well as the outreach plans for year 2025. In 2024, the Commission issued 1 notification to the supervisory agencies on the publication of UNSCRs.



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, the content of the "Asset Freezing Regime" has been integrated into the regular AML/CFT training for different sectors to promote the knowledge of the relevant regime more effectively and further enhance their understandings. In 2024, GIF being the Secretariat of the Commission provided a total of 5 explanatory sessions to introduce the requirements and obligations of Law no. 6/2016 "Asset Freezing Regime" to the sectors, including the financial sector, dealers of goods of high unit value, auction sector, company service providers, accounting professionals and real estate intermediaries/agents, with a total of approximately 450 participants. The Commission will continue to promote relevant legislation and training to enhance the sectors' understanding of the requirements of the "Asset Freezing Regime".

3.4 Participation of International Bodies Activities

ML, TF and PF 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/CPF, in particular the 40 Recommendations of FATF. Macao SAR joined the APG in 2001 and the former GIF joined the Egmont Group in 2009. As a member, Macao SAR has been proactively enhancing its AML/CFT/CPF 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.

As the former GIF was integrated into SPU on 1 February 2024, in accordance with the Charter of the Egmont Group, GIF was required to submit legal documents for the integration into SPU to the Egmont Group, to assure the technical and operational independence of GIF. After the Egmont Group's review of the relevant documents and its internal discussions, the Egmont Group confirmed that the structural change of GIF would not impact its membership status.

3.4.1 Macao SAR being Represented as Co-Chair of APJG

CHAPTER III

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/CPF. 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.

Aside from the role as APJG Co-Chair, GIF's delegate also participated in APJG meetings as reviewer to analyze and discuss the progress of the listed members in the Asia-Pacific region.

Chairing of APG Mutual Evaluation Committee

Since September 2013, GIF sent one representative to serve as one of the Co-Chairs of the APG Mutual Evaluation (ME) 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 August 2025. The core function of the MEC is that it supports the ME work of APG, 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, provides recommendations to members concerning some key issues to ensure the quality and consistency of ME and follow-up procedures. During 2024, the representative of GIF participated in or chaired a total of 4 MEC virtual meetings on behalf of the Macao SAR, and chaired the MEC meeting prior to the APG Annual Meeting held in September 2024.

Being one of the Co-Chairs of the MEC, the representative of GIF has been participating in assessor training workshops to provide training to potential assessors and reviewers of the APG, FATF and other FATF Style Regional Bodies (FSRBs). In May and December 2024, the representative of GIF attended APG's Assessor Training workshop and served as a mentor to assist member jurisdictions to deepen their understanding of updated methodology.



The representative of GIF chaired the APG MEC meeting as one of the Co-Chairs

3.4.3 Participation in ME of Other APG Member Jurisdictions

CHAPTER III

Being a member of APG, Macao SAR is obliged to nominate appropriate experts to assist APG in the ME assessment. In 2024, 3 representatives from GIF have taken up the assessor role in the FATF/APG ME of 3 member jurisdictions. While 2 of the MERs were completed for discussion or endorsement in September and October 2024 respectively, and the other ME started in May 2024 and was still in progress. In addition, 1 representative from GIF, who has experience as an assessor, has been nominated to take up the reviewer role for another member jurisdiction of APG, and the relevant work was completed in September 2024.





In March, May and December 2024, 3 representatives of GIF participated in the Assessor Training Workshop organized by the FATF or the APG, while another 2 representatives who had completed the previous round of assessor training attended a 3-day supplementary Virtual Assessor Refresher course in April 2024. GIF and members of the Interdepartmental AML/CFT Working Group will continue to nominate representatives to participate in the APG Assessor Training Workshops, in order to fulfill its duties as a member of an international organization.





Representatives of GIF attended the APG Assessor Training in New Zealand



A representative of GIF attended the APG Assessor Training in Japan

3.5 International and Regional Cooperation

With the development of Macao's economy and the globalization of people, logistics and capital flows, GIF understands that international cooperation is the key to success in the prevention and suppression of ML/TF/PF, 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 other related crimes 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 2024, there were 33 MOUs signed by GIF with overseas jurisdictions' FIUs.

The following table indicates the statistics on information exchange between GIF and overseas counterparts during 2024:

Table 4: Statistical Data of Information Exchange

2024	Number
Incoming Requests for Information	48
Outgoing Requests for Information	60
Financial Intelligence Received	19
Financial Intelligence Sent	17

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

CHAPTER III

3.5.1 The 5th AML Tripartite Meeting (Mainland China, Hong Kong **SAR and Macao SAR)**

GIF coordinated the Macao SAR delegation, which included representatives from the CCAC, the SA, the PJ, the AMCM, the DICJ, and GIF to participate in the "5th AML Tripartite" Meeting (Mainland China, Hong Kong SAR and Macao SAR)" organized by the Anti Money Laundering Bureau of the People's Bank of China in Chengdu, Sichuan from 19 to 20 November 2024. The exchange activities featured a comprehensive agenda focusing on significant progress in AML efforts across the 3 jurisdictions since the 4th round mutual evaluations of the FATF. Participants engaged in forward-thinking discussions about potential challenges in the upcoming 5th round of mutual evaluations. In order to further deepen and promote the cooperation among the AML authorities of Mainland China, the Hong Kong SAR and the Macao SAR in the prevention and combating of money laundering crimes, GIF will regularly meet with Mainland China and Hong Kong SAR to explore future synergistic cooperation mechanisms in relation to AML/CFT/CPF.



3.5.2 GIF Visited the Financial Intelligence and Investigation Bureau of the Hong Kong Police Force

In order to continuously improve the AML legal framework and further comply with the latest international AML standards, 5 delegates from GIF visited the Joint Financial Intelligence Unit of the Financial Intelligence and Investigation Bureau of the Hong Kong Police Force on 12 August 2024. The two agencies discussed the legal systems and case studies in AML/CFT/CPF. On the same day, delegates of GIF also met with Hong Kong Customs and Excise Department, in which the declaration and disclosure system of currency and bearer negotiable instruments and the enforcement achievements were shared. These visits not only enhanced the cooperation between GIF, the Hong Kong Police Force and Hong Kong Customs and Excise Department, but also critical to combat cross-border crimes on ML/TF/PF.



GIF visited the Hong Kong Joint Financial Intelligence Unit



GIF visited Hong Kong Customs and Excise Department

CHAPTER III

3.5.3 Visits and Exchanges with Counterparts in the Mainland

On 16 August 2024, delegates from GIF visited the Financial Development Bureau of the Guangdong-Macao In-Depth Cooperation Zone in Hengqin to learn about the latest financial business development in Hengqin and the prevention of financial risks. The two agencies also explored the mutual AML cooperation mechanism, with the aim to enhance information sharing and establish closer cooperation.



GIF visited the Financial Development Bureau of the Guangdong-Macao In-Depth Cooperation Zone in Hengqin

On 13 September 2024, representatives of GIF participated in the "Virtual Asset Cross-Payment Network Tracking Technology" seminar organized by the China Anti-Money Laundering Monitoring and Analysis Centre (CAMLMAC) in Beijing. This seminar provided a platform for experts to share their experiences and discuss the current situation and regulatory trends in monitoring and analysis of virtual assets.



As set out in "The Implementation Plan for Financial Supports to Construction Opinions of the Guangdong-Macao In-depth Cooperation Zone in Hengqin", to promote cooperation of financial risk supervision, and to strengthen communication between regulatory authorities of financial sector in Guangdong and Macao SAR, representatives from GIF met with representatives of the Guangdong Branch of the People's Bank of China (PBOCGD) in Zhuhai on 18 October 2024. During the meeting, both parties discussed in depth about the new trends/risks in ML/TF/PF, as well as challenges faced in monitoring cross-border capital flows. Both parties also explored cooperation opportunities between Guangdong and Macao SAR in relevant areas with the goal of enhancing financial risk prevention.



3.6 Attending International Conferences

CHAPTER III

As a member of international organization, GIF proactively participated in international conferences and assessment missions of member jurisdictions. In 2024, GIF coordinated with the AML/CFT Working Group members and also sent delegates to participate in international conferences and trainings as follows:

Table 5: List of International Conferences participated by GIF in 2024

Quarters	Conferences	Location	
	APJG Meeting	Thailand, Bangkok	
	FATF Webinar: Parallel Financial Investigations	GIF (Virtual meeting)	
1 st	2024 Egmont Working and Regional Groups Meetings	St. Julian's, Malta	
Quarter	FATF Plenary and Working Group Meeting	GIF (Virtual meeting)	
	On-site visit of ME for Argentina	Buenos Aires, Argentina	
	Face-To-Face Meetings of ME for Timor-Leste	Timor-Leste	
2nd	APG MEC Meeting	GIF (Virtual meeting)	
Quarter	APJG Meeting	Bali, Indonesia	
	The 30 th Egmont Group Plenary (2024)	Paris, France	
	FATF Plenary and Working Group Meetings	Singapore	
	Face-To-Face Meetings of ME for Argentina	GIF (Virtual meeting)	
3rd	APJG Meeting	Hong Kong, China	
Quarter	APG MEC Meeting	GIF (Virtual meeting)	
	2024 APG Annual Meeting and Forum on Technical Assistance & Training	Abu Dhabi, United Arab Emirates	
	FATF Plenary and Working Group Meetings	Paris, France	
4 th Quarter	25 th APG Annual Typologies & Capacity Building Workshop	Kuala Lumpur, Malaysia	
Quai toi	APG Governance Committee Meeting	GIF (Virtual meeting)	



Representatives of GIF participated in the 2024 Egmont Working and Regional Groups Meetings in St. Julian's, Malta



Representatives of GIF participated in the 2024 Egmont Group Plenary in Paris, France

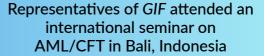






The Macao SAR delegation participated in the 25th APG Annual Typologies & Capacity Building Workshop in Kuala Lumpur, Malaysia













3.7 Local Cooperation

3.7.1 Cooperation among Government Agencies

Financial intelligence sharing and collaboration are fundamental to *GIF*'s operations. Maintaining effective partnerships with all the relevant 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 against ML/TF/PF. During 2024, the meetings listed below were held among judiciary authorities, LEAs and supervisory agencies:

Judicial Authorities and LEAs

- ▶ Under the coordination of GIF, a meeting was held in June with the Court, MP, CCAC and PJ to discuss the latest revisions of the FATF's requirements and assessment methodology for asset recovery and confiscation, as well as to share practical examples from other jurisdictions.
- ► GIF held meetings with MP and PJ in October and November respectively to exchange views on the revision of Law no. 2/2006 "Prevention and Suppression of the Crime of Money Laundering".

Supervisory Agencies

- ► GIF held bilateral meetings with AMCM in January, July and November. Agendas included the outreach arrangement of the "Macao Special Administrative Region Risk Assessment Report on Money Laundering/ Terrorist Financing/Financing of Proliferation of Weapons of Mass Destruction", the revision of Law no. 2/2006 "Prevention and Suppression of the Crime of Money Laundering", the latest requirements of international organizations, as well as the trends of suspicious transaction.
- ► GIF held a meeting with DSAJ in October to share the latest international standards revised by the FATF, and to exchange views on the revision of Law no. 2/2006 "Prevention and Suppression of the Crime of Money Laundering".
- ► GIF held a meeting with DICJ in November to discuss the analysis report on ML/TF risks in the gaming sector, suspicious transaction trends and outreach work plans.

Asset Freezing Coordination Commission

CHAPTER III

▶ The 17th meeting of Asset Freezing Coordination Commission was held in December.

Interdepartmental AML/CFT Working Group Meeting

Meetings with the AML/CFT Working Group were held in August and December to discuss the analysis and the outreach work of the latest "Macao Special Administrative Region Risk Assessment Report on Money Laundering/Terrorist Financing/Financing of Proliferation of Weapons of Mass Destruction", the latest revision of the FATF ME methodology, and preparations for the next round of APG ME.



Interdepartmental AML/CFT Working Group Meeting

3.7.2 "Joint Meeting on Prevention and Suppression of Financial Crimes"

In view of the evolving financial environment, the prevention and suppression of financial crimes is crucial in sustaining the healthy development of economy and strengthening regulatory measures, while raising awareness in different sectors is also essential.

In order to enhance the awareness of the financial sector, GIF organized the 12th "Joint Meeting on Prevention and Suppression of Financial Crimes" with the banking sector in November 2024, with about 40 participants including compliance officers and representatives from the banking sector. During the meeting, representatives of GIF presented data on STR in Macao SAR, comprehensively analyzed recent typologies and trends of suspicious transactions in the financial sector, and discussed the latest international standards for AML/CFT/CPF.

Through experience and information sharing, GIF aimed to enhance the vigilance of banking sector against risks of financial crimes and deepen their understanding of preventive measures.



3.8 Public Awareness Program

GIF continued to raise public awareness on AML/CFT/CPF through publications and trainings. In 2024, GIF organized series of public awareness programs for different sectors and public, including trainings tailored for different stakeholders, publication of newsletters and annual reports, promotional videos, as well as the website and WeChat Official Account with updates on AML/CFT/CPF issues accessible to the public.

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

3.8.1 Local Trainings Attended by GIF Staff as Presenter and / or **Participants**

In 2024, GIF was invited as presenter/guest speaker at seminars held by different departments or associations and arranged representatives to participate in different training sessions. In addition, staff of GIF visited the "National Security Education Exhibition" in April 2024 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 to have a better understanding of the concept of overall national security.







A representative of GIF was invited to be speaker at the "New Achievements, New Opportunities, New Actions: Symposium on the External Legal Affairs of the Macao SAR Commemorating the 25th Anniversary of Macao's Return to the Motherland"



A representative of GIF was invited to be speaker at the 2024 **AML Seminar for Insurance Sector**



A representative of GIF was invited to be speaker at the 8th Banking Supervision Conference of the Central Banks of Portuguese-Speaking Countries/Regions



3.8.2 Trainings for Government Agencies and Private Sector

CHAPTER III

Raising the awareness of supervisory agencies and reporting entities on their AML/CFT/CPF obligations is always crucial to the functions of GIF. During 2024, the following 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 6: List of Trainings and Seminars Organized by GIF in 2024

Sectors	Training Target	Attendance
Financial	Financial Sector	469
Institutions	Bank Sinopac Company Limited, Macau Branch	40
Real Estate Sector	Real Estate Agents	15
	Total	524





Table 7: List of Seminars Organized/Co-organized by GIF for Higher Education Institutions and Juveniles in 2024

Industries	Training Target	Attendance
Educational	Academy of Public Security Forces (ESFSM)	30
Institutions	Students of Santa Rosa de Lima English Secondary School	120
	Total	150





In addition, the latest "Macao Special Administrative Region Risk Assessment Report on Money Laundering/Terrorist Financing/Financing of Proliferation of Weapons of Mass Destruction" had been disseminated to different sectors in early January 2024. From February to May 2024, GIF and relevant competent authorities co-organized a total of 7 explanatory sessions covering all reporting entities with participants of around 900.

Explanatory sessions of "Macao Special Administrative Region Risk Assessment Report on Money Laundering/Terrorist Financing/Financing of Proliferation of Weapons of Mass Destruction" held by GIF in 2024:



Financial Sector



45











3.8.3 The 2nd "Outstanding STR Case Award" and "AML Knowledge Contest" held by *GIF*

CHAPTER III

In 2023, *GIF* held the 1st "Outstanding STR Case Award" for banking sector with great success. With this experience, GIF continued to organize this function and the ceremony for the 2nd "Outstanding STR Case Award" was held on 25 November 2024 to recognize exceptional STR cases. The winner of the "Best STR Case" award in 2024 was Hang Seng Bank Limited, Macau Branch, while Bank of China (Macau) Limited and Industrial and Commercial Bank of China (Macau) Limited jointly shared the "Outstanding STR Case" award. *GIF* extended warm invitations to the representatives of awarded banks to present their identification and analysis processes, preventive measures taken, typologies and insights gained from the STR cases. Through the ceremony, *GIF* anticipated to motivate reporting entities and practitioners to improve the quality of suspicious transaction reporting and reinforce internal control measures of the banking sector against ML/TF/PF. Hence, a strengthened protective network will be developed through the partnership between the public and private sectors.



In addition, *GIF* held three "AML Knowledge Q&A Lucky Draw" in 2024 to raise the AML awareness of the public and juveniles, to encourage them to participate the activities through lucky draws. *GIF* aimed to enhance the public awareness of crime prevention by organizing different types of promotional campaigns, to prevent and suppress ML and safeguard the financial security of the Macao SAR.



Courtesy Visit from/to Other Entities

In 2024, GIF continued to receive courtesy visits from different financial institutions and private sectors. Through these visits, GIF introduced the AML/CFT/CPF related works conducted by the Macao SAR government, the trends, typologies of STRs and related financial knowledge, and to keep abreast the latest market development of new products and services, so as to consider the ML/TF/PF risks involved and enhance the relevant AML/CFT/CPF preventive measures when necessary, with the aim to elevate the effectiveness of AML/CFT/CPF in Macao SAR.



Representatives of Banco Comercial Português, S.A., Macau Branch visited GIF







Means of STR Submission

GIF has launched the Online STR Reporting System (secured website) for 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 8: Statistical Data for the Methods of STRs Submission

Methods of				١	Number	of STRs				
Submission	2020	%	2021	%	2022	%	2023	%	2024	%
Paper Form	583	26.2%	613	25.2%	424	19.3%	421	9.1%	451	8.6%
Secured Website	1,641	73.8%	1,822	74.8%	1,775	80.7%	4,193	90.9%	4,794	91.4%
Total	2,224	100%	2,435	100%	2,199	100%	4,614	100%	5,245	100%



From the data above, secured website was the main method of submission of STRs in 2024. A total of 4,794 STRs were submitted through secured website, which accounted for 91.4% of total submission. Out of these 4,794 STRs, 3,837 STRs were submitted by the gaming sector, while 957 STRs were submitted by the financial sector and other 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 Enhancement of Information Systems and Network **Security Construction**

In 2024, GIF continued to promote the enhancement of information systems and network security construction, aiming to enhance the efficiency of financial intelligence analysis and respond to complex security challenges effectively. Major tasks include upgrading the online suspicious transaction reporting system, improving the data collection mechanism to ease the analysis of regional capital flow trends, which is beneficial for financial analysis. In addition, GIF has further improved its internal systems, including refining the risk model to better align with the current trends of suspicious transactions, introducing automations to simplify operations, thus reduce the workload of analysts and enhance work efficiency. GIF had been committed to enhance the financial analysis through system upgrades, to enhance the governance of intelligence data at the technical level, in order to combat ML and other financial crimes. In 2024, GIF launched the procurement project for the "Anti-Money Laundering Analysis System".

In response to the integration of GIF into SPU in 2024, GIF performed network connections for computer systems, to ensure smooth operations in system applications and data exchange. Given the complexity of network environment, to rely solely on traditional security devices such as firewalls make it difficult to detect potential risks and malicious intrusions, and endpoint protection has limitations in identifying malicious traffic. To address these challenges, based on recommendations from risk assessment experts, GIF successfully deployed a cyber threat monitoring and analysis platform in 2024. The platform could perform real-time monitoring of internal network of GIF, speed up the identification of suspicious or potential security threats, ultimately enhance the level of cybersecurity.

In order to strengthen the cybersecurity environment of GIF and ensure compliance with the regulations of the Macao Cybersecurity Law, GIF continued to conduct cybersecurity risk assessment, vulnerability scanning, penetration testing, and gap analysis of major systems against the "Cybersecurity - Regulations of management standards". Recommended rectifications had been completed in the year to ensure secure and reliable operation of information systems, and enhance the overall level of cybersecurity. GIF also arranged training on "Cybersecurity for people, cybersecurity relies on people" held by cybersecurity experts, with an aim to raise awareness of GIF staff, to deepen their knowledge on national cybersecurity, and to safeguard the cybersecurity environment of China and Macao SAR.

AMCM	Monetary Authority of Macao (Autoridade Monetária de Macau)
AML/CFT/CPF	Anti-Money Laundering / Combating the Financing of Terrorism /
	Combating the Financing of Proliferation of Weapons of Mass Destruction
APG	Asia/Pacific Group on Money Laundering
APJG	Asia/Pacific Joint Group
ASEL	Association of Lusophone Insurance Supervisors (Associação de
	Supervisores de Seguros Lusófonos)
ATM	Automated Teller Machine
CAMLMAC	China Anti-Money Laundering Monitoring and Analysis Center
CCAC	Commission Against Corruption (Comissariado contra a Corrupção)
CDM	Cash Deposit Machine
CIEPDSS	Independent Committee for the Exercise of Disciplinary Power
	over Solicitors (Comissão Independente para o Exercício do
	Poder Disciplinar sobre os Solicitadores)
CPSP	Public Security Force (Corpo de Polícia de Segurança Pública)
DICJ	Gaming Inspection and Coordination Bureau (Direcção de
	Inspecção e Coordenação de Jogos)
DSAJ	Legal Affairs Bureau (<i>Direcção dos Serviços de Assuntos de Justiça</i>)
DSEDT	Economic and Technological Development Bureau (Direcção dos
	Serviços de Economia e Desenvolvimento Tecnológico)
DSF	Financial Services Bureau (<i>Direcção dos Serviços de Finanças</i>)
ESFSM	Academy of Public Security Forces (Escola Superior das Forças
	de Segurança de Macau)
FATF	Financial Action Task Force

FIUs	Financial Intelligence Units
FSRB	FATF-Style Regional Bodies
GDP	Gross Domestic Product
GIF	Financial Intelligence Office (Gabinete de Informação Financeira)
Hong Kong SAR	Hong Kong Special Administrative Region
ICRG	International Cooperation Review Group
IH	Housing Bureau (Instituto de Habitação)
LEAs	Law Enforcement Agencies
Macao SAR	Macao Special Administrative Region
ME	Mutual Evaluation
MEC	Mutual Evaluation Committee
MER	Mutual Evaluation Report
ML	Money Laundering
MOU	Memoranda of Understanding
MP	Public Prosecutions Office (Ministério Público)
PBOCGD	Guangdong Branch of the People's Bank of China
PF	Proliferation Financing of Weapons of Mass Destruction
PJ	Judiciary Police (Polícia Judiciária)
SA	Macao Customs Service (Serviços de Alfândega de Macau)
SPU	Unitary Police Service (Serviços de Polícia Unitários)
STRs	Suspicious Transaction Reports
TF	Terrorist Financing
UNSCRs	United Nations Security Council Resolutions



警察總局 SERVIÇOS DE POLÍCIA UNITÁRIOS

金融情報辦公室 Gabinete de Informação Financeira

ID: MacaoSPU



ID: GIFMacao



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, Edifício Banco da China, 22º andar, Macau

網址 Website: www.spu.gov.mo (警察總局)/ www.gif.gov.mo (金情辦)