



**NATIONAL  
ANTI-MONEY LAUNDERING  
AND  
COUNTER TERRORIST FINANCING**

***Strategic Plan***

**2017-2022**

## Note

*The PNG National Anti-Money Laundering and Counter Terrorist Financing Strategy was initially drafted and endorsed in 2014 by the National Coordinating Committee (NCC) for Anti-Money Laundering and Counter Terrorist Financing and National Executive Council. It was reviewed and updated by the NCC Secretariat in early 2017, following consultation with NCC stakeholders (by email and face to face). In May 2017, the NCC engaged EY Consultant Bridi Rice (via the Australian Aid funded JSS4D program) to support the NCC Secretariat to assess and update the strategy to ensure its alignment with the revised Financial Action Task Force (FATF) Recommendations and Methodology, and the findings of the PNG National Risk Assessment. This is a product of the NCC.*

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## NCC CO-CHAIR'S FOREWORD



Dr. Lawrence Kalinoe, OBE  
(Co-chair from 2012 - 2018)

We, the Co-Chairs of the Anti-Money Laundering and Counter Terrorist Financing (AML/CTF) National Coordinating Committee (NCC), are pleased to present the National AML/CTF Strategic Plan from December 2017 - 2022 (Strategic Plan). This Strategic Plan stems from **NEC Decision No. 324/2013** as the blueprint of AML/CTF reform in Papua New Guinea (PNG). The Strategic Plan incorporates the risks identified in PNG's Money Laundering and Financing of Terrorism National Risk Assessment (NRA) following PNG's exit from the Financial Action Taskforce (FATF) Grey-List in June 2016.



Mr. Loi M Bakani, CMG  
(Co-chair from 2012 to date)

With this Strategic Plan, it follows on from the last Strategic Plan and revises the previous five (5) strategic objectives that were set and includes two new objectives. It also takes into account the "effectiveness criteria" of the FATF Methodology.

The Strategic Plan is set out in two (2) parts: its strategy and the action plan. The strategy sets out its vision to build a robust system for AML/CTF in PNG and the objectives in implementing the vision.

There are seven (7) strategic objectives that ensure that:

1. *There is a Nationally Coordinated Risk based Approach to AML/CTF in Papua New Guinea.*
2. *The Financial Analysis and Supervision Unit (FASU) must operate in an active, astute and professional manner, ensuring that its operation is connected well with all its agencies.*
3. *All required AML/CTF legislation be established and implemented, also amendments be made as necessary.*
4. *There is an environment created that is interactive and responsive for AML/CTF Regulations, supervision and compliance.*
5. *All law enforcement authorities must be active in dealing with financial crimes and ensure signals are given out to the public that no one is above the law.*
6. *There is a continuous upscale and strengthening of counter terrorist financing, sanctions and proliferation measures; and*
7. *There is engagement in international cooperation to facilitate action against criminals and their assets and drive PNG's engagement in transnational response to money laundering and terrorist financing.*

We would like to emphasise that in order to have a robust AML/CTF system, it is important that the NCC through the efforts of 18 agencies in collaboration with assistance from the Government and supported by international partners, implement the Strategic Plan as detailed in the action plan.

Finally, we acknowledge the effort of the NCC agencies, the NCC technical working group and the NCC Secretariat team working with Consultant Ms Bridi Rice of Ernst and Young (via the Australian Aid funded JSS4D Program) for the work involved to finalise the Strategic Plan including the endorsements from the respective Heads of NCC member agencies to support this Strategic Plan as it guides PNG in the next 5 years.

Yours sincerely,

Dr. Lawrence Kalinoe, OBE  
Acting Secretary  
Department of Justice and Attorney General

Mr. Loi Bakani, CMG  
Governor  
Bank of Papua New Guinea

## ABBREVIATIONS

AML/CTF	Anti-Money Laundering and Counter Terrorism Financing
AML/CTF Act	<i>Anti-Money Laundering and Counter Terrorist Financing Act 2015</i>
APG	Asia/Pacific Group on Money Laundering
BPNG	Bank of Papua New Guinea (also referred to as the Central Bank)
CDD	Customer Due Diligence
DJAG	Department of Justice and Attorney General
DNFBP	Designated Non-Financial Businesses and Professions
FASU	Financial Analysis and Supervision Unit
FATF	Financial Action Task Force
FI	Financial Institution(s)
FIU	Financial Intelligence Unit
GST	Goods and Services Tax
IPA	Investment Promotion Authority
IRC	Internal Revenue Commission
ML	Money laundering
MoU	Memorandum of Understanding
NCC	National Coordinating Committee on AML/CTF
NFA	National Fisheries Authority
NFACD	National Fraud and Anti-Corruption Directorate
NPO	Non-profit organization
NRA	National Risk Assessment
OPP	Office of the Public Prosecutor
OSCA	Office of Security Coordination and Assessment
PEP	Politically exposed person
PM&NEC	Department of the Prime Minister and National Executive Council
PNG	Papua New Guinea
PNGFA	Papua New Guinea Forest Authority
POCA	<i>Proceeds of Crime Act 2005</i>
RPNGC	Royal Papua New Guinea Constabulary
SMR	Suspicious Matter Report
TF	Terrorist Financing
TWG	Technical Working Group



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# **PART ONE: THE STRATEGY**



# Introduction

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## Background

The Papua New Guinea (PNG) Government at the highest levels has committed to ensuring a robust PNG Anti-Money Laundering and Counter Terrorist Financing (AML/CTF) System. In February 2014, the Prime Minister wrote to the Financial Action Task Force (FATF) to state PNG's undertaking to ensure a robust AML/CTF framework as a matter of priority. The Prime Minister wrote:

*"I am writing on behalf of my Government to provide high-level endorsement...PNG appreciates the seriousness of this process and the importance of a strong anti-money laundering framework for the financial stability and security of our nation and region. My Government therefore, is committed to ensure that this action plan is implemented within the timeframes agreed to.*

*I have already tasked the PNG National Coordinating Committee (NCC) on Anti-Money Laundering and Counter Financing of Terrorism ... The NCC is PNG's high level committee responsible for coordination and policy guidance on anti-money laundering and counter financing of terrorism reforms. PNG has commenced work on improving our system through the NCC and we will continue to progress these reforms."*

In 2014, the first PNG Anti-Money Laundering and Counter Terrorist Financing Strategy was endorsed by the NCC and the National Executive Council (NEC). The first strategy was intended to cover the period of significant reform undertaken by PNG during its engagement and 'greylisting' by FATF over the period 2014-2017. Following the de-listing of PNG from the FATF 'greylist', PNG once again made a Prime Ministerial commitment to the domestic and international community to:

*"...affirm and communicate to you PNG's ongoing high-level political support for the implementation of its FATF action plan, as well as overall AML/CTF measures. PNG appreciates the significance of this process and the importance of a robust AML/CTF regime to the financial stability and security of our nation and region.*

*PNG is committed to continuing the implementation work that is already underway in accordance with the respective Legislative Project Implementation Plans. PNG anticipates working closely with donors and the APG [Asia Pacific Group on Money Laundering] in the coming months and years to ensure that PNG's AML/CTF system is not only technically compliant with the FATF Recommendations, but is also operating effectively, consistent with the FATF Immediate Outcomes.*

*PNG is continuing to leverage effective and well-coordinated technical assistance to support its efforts. PNG would welcome the continuation of this support to ensure that PNG officers, in both existing and new institutions, build the substantial capacity required to effectively implement its AML/CTF regime."*

## Vision Statement

The vision for PNG's National AML/CTF Strategy is:

*"Creating an enabling environment for investment, trade, business development and economic stability, free from the influence of money laundering, proliferation and terrorist financing in Papua New Guinea."*

## Implementation process

This National Anti-Money Laundering and Counter Terrorist Financing Strategic Plan 2017-2022 (the Strategic Plan) is the product of the work of the Anti-Money Laundering and Counter Terrorist Financing Committee (the NCC). The Strategic Plan follows on and enhances the original 2014-2017 strategy in the following key ways:

- It takes account of updates from NCC agencies;
- It takes account of the revised FATF methodology;
- It takes account of outcomes of the PNG National Risk Assessment (NRA);
- It shifts focus from short term reforms to medium and long term visions for a robust AML/CTF regime in PNG;
- It signals a significant shift in PNG policy to a risk based approach to AML/CTF; and
- It elevates the importance placed in PNG's AML/CTF regime on international cooperation, terrorist financing and proliferation of weapons of mass destruction.

To fulfil PNG's domestic and international commitments to reform the AML/CTF regime, a clear vision and strategy is required. This document provides this vision and strategy, and will be the blueprint for reform that will guide PNG Government agencies, particularly those who are members of the NCC and stakeholders in the coming five years.

## Developing the National Anti-Money Laundering and Counter Terrorist Financing Strategy



The Strategic Plan has been in development since early 2017 in three phases. The first phase was to update and assess the validity of the pre-existing National Strategy and Strategic Implementation Plan documents which have guided the NCC's AML/CTF priorities to date. This happened over a period from January to May 2017. In May 2017, the second phase commenced with the PNG NCC engaging the services of Ernst & Young (EY) supported by the Australian Aid program, to revise and re-develop these pre-existing documents into a new 2017-2022 Strategic Plan, taking into account new FATF requirements and findings from the National Risk Assessment process in PNG. The third phase commenced in June-July 2017, to undertake a peer review of the new draft (with domestic and selected international stakeholders), before final endorsement of the Strategic Plan by NCC in February 2018. This was also subsequently endorsed by NEC in November 2018.

Over the course of nine months during 2017, the development of this Strategic Plan has involved the close collaboration of approximately 40 PNG officers from 15 different agencies, 3 AML/CTF expert consultants, and an additional 12 individuals from PNG's key strategic AML/CTF partners including

the Australian Attorney-General's Department and Australian Transaction Reports and Analysis Centre (AUSTRAC). The draft has been produced following two NCC meetings, five NCC Secretariat meetings, two formal rounds of agency consultation and peer review to finalise.

## Strategic Plan Overview

There are two parts to this Strategic Plan. Part 1: The Strategy outlines the vision for a robust AML/CTF system in PNG. This is the strategic component of the Strategic Plan that sets out the guiding principles and objectives for PNG's AML/CTF system. Part 2: The Action Plan is the implementation component of the strategy. It is a living part of the document which guides NCC deliberations and agency action, establishing key areas of responsibility for PNG agencies for the next five years, and breaking these down into 'Action Items'. The Action Plan is supported by additional agency documentation developed at the project level.



## Strategic Plan Implementation



Establishing a practical and effective AML/CTF system is a national priority. Ensuring that PNG's AML/CTF system is robust will assist the Government to advance our security, economic and anti-corruption agendas.

The implementation of this Strategic Plan is the responsibility of the NCC which comprises heads of agencies from 18 different PNG institutions. The NCC is supported by a Technical Working Group (TWG) comprised of technical officers of the same agencies, and a Secretariat comprised of officers from the Department of Justice and Attorney General, and the Bank of PNG. The NCC's role, with the support of the TWG and Secretariat, is to ensure that agencies are undertaking activities to meet their obligations in the Strategy.

Under the Strategic Plan, each agency is required to report against each Action Plan Item to the PNG NCC on Anti-Money Laundering and Counter Terrorist Financing on a quarterly basis.

Where NCC members consider agency progress to be insufficient, NCC Co-Chairs will advise on necessary follow up activities. Failure to progress will result in:

- Formal correspondence between heads of agency and NCC Co-Chairs.
- Formal reporting in regular NEC information paper updates provided by NCC Co-Chairs to NEC.

## Revision and Update of the National Strategic Plan

This Strategic Plan will be reviewed and updated through the following key review mechanisms:

### 1. Minor revision post NCC meetings

Part 2: The Action Plan will be reviewed and revised on a regular basis as and when the need arises following NCC meetings to take account of items completed and emerging priorities. As outlined above, each agency is required to report against Action Items in the Action Plan at quarterly NCC meetings.

**2. Annual gap analysis and progress assessment**

An annual gap analysis of Part 2: The Action Plan will be undertaken to ensure that it remains alive to progress made, self-assessments against FATF Recommendations and Methodology, emerging risk monitoring and assessments, and key resourcing priorities. This gap analysis process should also consider a short progress assessment against the Strategic Plan's key performance indicators.

**3. 2019 – Pre-mutual evaluation assessment and recalibration of Strategic Plan**

A substantial wholesale review in 2019 will be conducted, involving an assessment of performance against Key Performance Indicators set out in this Strategic Plan.

Individual agencies should be guided first and foremost by undertaking the priorities set forth in Part 2: The Action Plan. Agencies will be measured against these commitments at each NCC meeting. Achievement of these will directly contribute to the overall achievement of the Strategic Plan. The Key Performance Indicators set out in the Strategic Plan are intended as a guide to all NCC agencies, not as a prescriptive set of individually achievable tasks. Measurement of progress against these KPIs on an annual basis and in 2019 will provide a strategic snapshot of AML/CTF system reform progress in PNG.

## Strategy Objectives

Hardening a nation's financial system against financial crime is no small undertaking. In PNG it requires reform of a substantive suite of legislation, coordination of reforms across 18 separate agencies, a major overhaul of our regulation and supervision activities as well as a change in the culture and behaviours within institutions that deal with the proceeds of crime. At the same time, it requires concentrated domestic and international law enforcement effort to ensure offenders face imprisonment and loss of their assets if they continue to contravene the PNG AML/CTF system.

This Government understands what is required to realise our vision for an effective AML/CTF system within PNG. This Strategy sets out seven objectives to guide PNG agencies to ensure a robust financial system, hardened against financial crime. These are set out below and explained in detail herein.

### Summary of Strategic Objectives

Strategic Objective	Description
1 Driving a Nationally Coordinated Risk Based Approach to AML/CTF in PNG	Ensure the PNG Government's risk based approach is driven by current evidence and analysis of AML/CTF risks, domestic priorities and international obligations. Hold agencies to account for integrating a risk based approach to all AML/CTF activities undertaken.
2 Operating an active, astute, professional, & connected Financial Analysis & Supervision Unit	Consolidate, resource and advance the FASU capability to receive, analyse and disseminate financial intelligence as the lynch pin of PNG's anti-money laundering and counter terrorist financing system. FASU's activities and resources should be allocated on a risk based approach. Competent authorities must use financial intelligence and all other relevant information to advance their responsibilities for AML/CTF.
3 Refine, establish and implement required AML/CTF Legislation	In accordance with risks identified and priority legislation required, enact, amend and implement legal frameworks to combat money laundering, terrorist financing and proliferation of weapons of mass destruction in accordance with international obligations and PNG conditions.
4 Build an interactive and responsive climate for AML/CTF Regulation, Supervision and Compliance	Demand and cultivate a dynamic AML/CTF climate where financial institutions (FIs) and Designated Non-Financial Businesses and Professions (DNFBPs) adequately apply AML/CTF preventative measures commensurate with their ML/TF risks and all supervisors supervise, monitor and regulate FIs and DNFBPs for compliance with AML/CTF requirements commensurate with their ML/TF risks.
5 Active and targeted law enforcement	Law enforcement authorities must send public signals that no one is above the law when it comes to financial crime. Law enforcement authorities must prioritise and resource anti-money laundering, proceeds of crime and counter terrorist financing activities commensurate with risks, and continue to engage in international cooperation to support these activities.
6 Strengthen and upscale counter-terrorist financing, sanctions and proliferation measures	Commensurate with the risks identified, PNG agencies must prevent terrorists, terrorist organisations and terrorist financiers from raising, moving and using funds, and from abusing the not for profit sector.
7 Engaging in International Cooperation to facilitate action against criminals and their assets and drive PNG's engagement in a transnational response to money laundering and terrorist financing	All agencies will engage in international cooperation consistent with AML/CTF priority areas, risks identified and in support of their effective implementation of Strategic Plan obligations.

## PNG AML/CTF Strategic Plan 2017-2022

Agency responsibility for objectives at a glance



### Alignment of Strategic Plan with FATF Methodology Immediate Outcomes

The objectives identified in the Strategic Plan align with the Immediate Outcomes of the FATF Methodology in the following ways. Firstly, the objectives themselves are aligned with the Immediate Outcomes as follows:

- Objective 1 relates to Immediate Outcome 1.
- Objective 2 relates to Immediate Outcome 6
- Objective 3 relates to all Immediate Outcomes
- Objective 4 relates to Immediate Outcomes 3, 4 and 5
- Objective 5 relates to Immediate Outcomes 7 and 8
- Objective 6 relates to Immediate Outcomes 9, 10 and 11
- Objective 7 relates to Immediate Outcome 2

Secondly, the Key Performance Indicators in the Strategic Plan are aligned with the Core Issues of the FATF Immediate Outcome Methodology. Agencies with responsibilities for the objectives above are and will be advancing PNG compliance with the Immediate Outcomes of the FATF Methodology.

# Strategic Objective 1

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## Driving a Nationally Coordinated Risk Based Approach to AML/CTF in PNG

Ensure the PNG Government's risk based approach is driven by current evidence and analysis of AML/CTF risks, domestic priorities and international obligations. Hold agencies to account for integrating a risk based approach to all AML/CTF activities undertaken.

### Key Performance Indicators

- 1.1 How well does the country understand its money laundering (ML) and terrorist financing (TF) risks?
- 1.2 To what extent is the relevant work of the NCC undertaken in coordination with PNG's broader national security agencies, architecture and priorities? Alternatively: How well does the NCC coordinate with PNG's broader national security agencies, architecture and priorities in performing this work?
- 1.3 How effectively are identified ML/TF risks addressed by national AML/CTF policies and activities?
- 1.4 To what extent are results of assessment(s) of risks properly used to justify exemptions and support the application of enhanced measures for higher risk scenarios, or simplified measures for lower risk scenarios?
- 1.5 To what extent are objectives and activities of competent authorities consistent with evolving national AML/CTF policies, and identified ML/TF risks?
- 1.6 To what extent do competent authorities and SRBs co-operate and co-ordinate development and implementation of policies and activities to combat ML/TF and, where appropriate, the financing of proliferation of weapons of mass destruction?
- 1.7 To what extent does the country ensure that respective FIs, DNFBPs and other sectors affected by the application of the FATF Standards are aware of the relevant results of the national ML/TF risk assessment(s)?

### Key Evidence

- 1.8 Country risk assessment, other assessments, publications, communications.
- 1.9 Country AML/CTF policies and strategies (including evidence of engagement at senior official level).
- 1.10 Publications, communications and evidence of outreach activities targeted at private sector and relevant authorities, to support application of FATF Standards and outcomes of ML/TF risk assessments.

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### How to meet this objective

This Strategy has been driven by the highest level of Government support – a vital ingredient to the successful reform of AML/CTF in PNG. The NEC (*by virtue of the decision NG 18/2012 on 13 December 2012*) endorsed the establishment of the AML/CTF National Coordinating Committee (NCC). This comprises of the heads of 18 Government agencies. The NEC noted the need to address the deficiencies in this country's AML/CTF regime identified in the *Asia Pacific Group Mutual Evaluation Report* and recognised the importance of ensuring this reform is led at the highest levels of Government. Since then, NCC has been the driving force behind PNG's development of a robust AML/CTF system. Going forward, the NCC is responsible for driving the key priorities of a risk based approach to AML/CTF reform in PNG.

The NCC comprises the heads of the following agencies:

- Department of Justice and Attorney General (Co-chair)
- Bank of Papua New Guinea (Co-chair)
- Department of Prime Minister and National Executive Council
- Department of Foreign Affairs and Trade
- Department of Finance
- Department of Treasury
- Royal Papua New Guinea Constabulary
- Office of the Public Prosecutor
- Internal Revenue Commission
- PNG Customs Service
- Investment Promotion Authority
- Securities Commission
- National Gaming & Control Board
- Office of the Insurance Commissioner
- PNG Immigration & Citizenship Service Authority
- PNG Forest Authority
- National Fisheries Authority
- National Intelligence Organisation



The NEC directed all Government agencies to work with the NCC to effectively address the gaps and deficiencies identified in the *Mutual Evaluation Report*. The NCC is supported by a TWG comprising officers from each of the agencies involved, and a Secretariat, comprising officers from the Department of Justice and Attorney General and the Bank of PNG. The work and decisions of the NCC are then implemented by the member agencies. Various member agencies are supported by technical assistance for the completion of their specific priorities.

The tasks of the NCC include:

- Establish, monitor and respond to current and emerging AML/CTF risks and ensure a risk based approach is taken to prioritizing AML/CTF reform in PNG;
- Develop and implement the PNG AML/CTF Strategic Plan (previously the National Strategy and Strategic Implementation Plan);
- Take coordinated measures to promote PNG's ongoing compliance with the FATF Recommendations;
- Promote and ensure coordination and collaboration between relevant Government agencies regarding AML/CTF risk based policy development and implementation;
- As appropriate, develop national risk based policy on AML/CTF, for endorsement by Government;
- Ensure efficient and effective operational coordination between law enforcement, Financial Analysis and Supervision Unit, regulatory and policy agencies in AML/CTF;
- Ensure efficient and effective coordination of technical assistance and training;
- Monitor the effectiveness of AML/CTF measures that have been implemented, and
- Report regularly to Government on the work of the NCC; and
- Ensure quality reporting is provided to international review bodies especially to the FATF on AML/CTF and the Asia Pacific Group on Money Laundering.



## Money Laundering and Financing of Terrorism National Risk Assessment

In May 2017, PNG's first Money Laundering and Financing of Terrorism National Risk Assessment (NRA) was conducted by the PNG Financial Analysis and Supervision Unit (FASU), driving a risk based approach to identifying, mitigating and managing ML/TF risks.

The NRA summarised that for ML, threats are posed to PNG where crimes are most likely to generate large amounts of value, are coupled with high rates of incidence and therefore have significant consequences. Specifically, the NRA identified the following major areas of criminal activity that are considered to provide significant ML threats to PNG:

- 1) Corruption and Bribery
- 2) Fraud against government programs and activities
- 3) Illegal logging and Fishing
- 4) Taxation and revenue fraud
- 5) Other environmental offences
- 6) Illicit drug importation and distribution

These threats are compounded by a number of vulnerabilities. PNG has porous borders, a cash based economy and a significant informal sector. This makes it easier to move cash and other items of value (such as illegally mined alluvial gold) in and out of PNG. Furthermore, there are capacity and skills shortages within government agencies, in non-bank financial reporting entities and in the DNFBP sector. Weaknesses in the regulatory and legislative framework (such as the lack of supervision of the Non-Profit Organization sector) and the need for greater inter agency coordination and cooperation exacerbate the situation.

Other significant ML threats arise from the operation of gangs and organised criminal activity in relation to illegal gambling, illicit movement of stolen, pirated and smuggled goods, robberies and theft, land frauds, the importation of arms, alcohol and cigarettes. In each case the vulnerabilities identified above increase the ML risks associated with these criminal activities. They will remain high for the foreseeable future.

The NRA summarised that for TF however, the likelihood of TF is assessed as low at present. This is because of the general absence of communities which might support terrorist activities or which might see 'home grown' or 'lone wolf' activity develop. Although the violence associated with domestic instability is of concern, it is not in the international terrorism context: however, this situation could change rapidly unless kept under very active review.

Whilst acknowledging that PNG's AML/CTF system has undergone significant reform over the last five years, the NRA identified that there still remain key vulnerabilities relating to the capacity and resource limitations within Government, environmental and resource protection (illegal logging and fishing), the cash economy, porous borders, high risk of trade based crime, creation of laundering businesses, legislative and regulatory weaknesses, and vulnerabilities of FIs and DNFBPs. These vulnerabilities will require ongoing responses, including enhanced coordination and cooperation, increased resources, infrastructure and technology, and most importantly, political will and government commitment.

## Strategic Objective 2

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### Operating an active, astute, professional, & connected Financial Analysis & Supervision Unit

Consolidate, resource and advance the FASU capability to receive, analyse and disseminate financial intelligence as the lynch pin of PNG's anti-money laundering and counter terrorist financing system. FASU's activities and resources should be allocated on a risk based approach. Competent authorities must use financial intelligence and all other relevant information to advance their responsibilities for AML/CTF.

#### Key Performance Indicators

- 2.1 To what extent is financial intelligence or other information accessed and used in investigations to trace criminal proceeds related to ML, associated predicate offences and TF?
- 2.2 To what extent do competent authorities receive or request reports that contain relevant and accurate information to perform their duties?
- 2.3 To what extent does FIU analysis and dissemination support operation of competent authorities?
- 2.4 To what extent does the FIU and other competent authorities exchange financial intelligence, and how effectively do they ensure the confidentiality of this information?

#### Key Evidence

- 2.5 Sources of financial intelligence and other information used by competent authorities, and frequency in which they are used as investigative tools.
- 2.6 Examples of information and financial intelligence shared between FIUs and other competent authorities.
- 2.7 Key suspicious matter report information, such as the number of SMRs analysed, perception of quality of information within reports, frequency with which competent authorities come across examples of unreported suspicious transactions and cases of tipping-off.
- 2.8 Sources of other relevant information, such as number of currency and bearer negotiable instruments reports received/analysed, types of information that competent authorities receive or obtain/access from other authorities (FIs and DNFBPs), typologies produced using financial intelligence.

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#### How to meet this objective

FASU is the lynch-pin of PNG's AML/CTF regime. During the life of this Strategy, it is anticipated that the FASU will capitalise on the success of its predecessor Financial Intelligence Unit (FIU) in RPNGC, and grow substantially to ensure that its financial intelligence capacity strengthens and becomes a reliable source that drives the achievement of all other strategic objectives in this document. Part of this process will involve building the various functions of FASU, its relationship with law enforcement, industry, national security agencies and regulators in PNG and abroad.

## Strategic Objective 3

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### Refine, establish and implement required AML/CTF Legislation

In accordance with risks identified and priority legislation required, enact, amend and implement legal frameworks to combat money laundering, terrorist financing and proliferation in accordance with international obligations and PNG conditions.

#### Key Performance Indicators

- 3.1 To what extent is PNG's core AML/CTF legislative regime consistent with domestic risks identified and international standards?
- 3.2 To what extent does legislation relating to the high risk sectors and entities identified in the National Risk Assessment meet the needs of regulators and industry with respect to responding to and mitigating ML risks?
- 3.3 To what extent is legislation understood and utilized by key PNG agencies and industry?
- 3.4 To what extent have activities been undertaken to ensure legislation can be fully implemented, including through increasing the understanding, skills and ability to implement the laws by all relevant Government and non-Government stakeholders?

#### Key Evidence

- 3.5 Passage and content of legislation, regulation, rules and other legislative instruments and guidance.
- 3.6 Evidence of effective industry outreach and understanding of legislative frameworks.
- 3.7 Number of actions taken by PNG agencies under legislation, including requests for information, utilization of enforcement powers and other tools to support AML/CTF policy implementation.
- 3.8 Numbers of investigations, prosecutions and cases undertaken in court.

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#### How to meet this objective

To ensure agencies are able to combat ML and TF, PNG is undertaking a staged approach to legislative reform during the life of this Strategy. This reform is led by the Department of Justice and Attorney General (DJAG) in consultation with key Government and non-Government stakeholders. Legislative reform will be prioritised commensurate with risks identified and is likely to require amendments to laws currently under the responsibility of DJAG and other members of the NCC. In addition to legislative amendments, a significant body of work must continue with respect to legislative implementation. This should be focused on achieving the key performance indicators outlined above, and ensuring that there is a balanced approach taken between technical legislative reform, and practical implementation.

## Strategic Objective 4

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### Build an interactive and responsive climate for AML/CTF Regulation, Supervision and Compliance

Demand and cultivate a dynamic AML/CTF climate where financial institutions (FIs) and Designated Non-Financial Businesses and Professions (DNFBPs) adequately apply AML/CTF preventative measures commensurate with their ML/TF risks and all supervisors supervise, monitor and regulate FIs and DNFBPs for compliance with AML/CTF requirements commensurate with their ML/TF risks.

#### Key Performance Indicators

- 4.1 How effectively do licensing, registration or other controls prevent criminals from: holding or being the beneficial owner of a significant or controlling interest, or holding a management function in FIs/DNFBPs? How well are breaches of such licensing or registration requirements detected?
- 4.2 How effectively do supervisors identify and maintain knowledge of ML/TF risks, between different sectors and types of institutions?
- 4.3 How effectively do supervisors supervise or monitor FIs and DNFBPs compliance with AML/CTF requirements, commensurate with ML/TF risks posed?
- 4.4 To what extent are remedial actions and/or effective, proportionate and dissuasive sanctions applied in practice?
- 4.5 To what extent are supervisors able to demonstrate that their actions have an effect on compliance by FIs and DNFBPs?
- 4.6 How effectively do supervisors promote a clear understanding of AML/CTF obligations and ML/TF risks for FIs and DNFBPs?
- 4.7 How well do FIs and DNFBPs understand their ML/TF risks and AML/CTF obligations?
- 4.8 How effectively do FIs and DNFBPs apply mitigating measures commensurate with their ML/TF risks?
- 4.9 How effectively do FIs and DNFBPs apply the Customer Due Diligence (CDD) and record-keeping measures (including beneficial ownership information and ongoing monitoring)? To what extent is business refused when CDD is incomplete?
- 4.10 How well do FIs and DNFBPs apply the enhanced or specific measures for: (a) Politically exposed persons (PEPs), (b) correspondent banking, (c) new technologies, (d) wire transfers rules, (e) targeted financial sanctions relating to TF, and (f) higher-risk countries identified by the FATF?
- 4.11 To what extent do FIs and DNFBPs meet their reporting obligations on the suspected proceeds of crime and funds in support of terrorism? What are the practical measures to prevent tipping-off?
- 4.12 How well do FIs and DNFBPs apply internal controls (including at financial group level) to ensure compliance with AML/CTF requirements? To what extent are there legal or regulatory requirements (such as financial secrecy) impeding its implementation?
- 4.13 To what extent is information on creation and types of legal persons and arrangements available publicly?
- 4.14 How effectively do relevant competent authorities identify, assess and understand vulnerabilities, and the extent to which legal persons created in the country can be, or are being misused for ML/TF?
- 4.15 How effectively have measures been implemented to prevent the misuse of legal persons and arrangements for ML/TF purposes?
- 4.16 To what extent can relevant competent authorities obtain timely, adequate, accurate and current basic and beneficial ownership information on all types of legal persons created in the country?
- 4.17 To what extent are effective, proportionate and dissuasive sanctions applied against persons who do not comply with the information requirements?

#### Key Evidence

- 4.18 Contextual factors regarding the size, composition, and structure of the financial and DNFBP sectors and informal or unregulated sector.
- 4.19 Supervisors' risk models, manuals and guidance on AML/CTF, and other publications and communications.
- 4.20 Evidence of supervisory engagement with industry, the FIU and other

competent authorities on AML/CTF issues, such as training or facilitation of interactions between FIs and DNFBPs.

- 4.21 Monitoring practices, including: frequency, scope and nature of monitoring and inspections (onsite and offsite); nature of breaches identified; sanctions and other remedial actions applied; and examples of cases where sanctions and other remedial actions have improved AML/CTF compliance.
- 4.22 Trend information relating to risks and general levels of compliance, as demonstrated through internal AML/CTF policies, procedures and programmes, and typologies reports.
- 4.23 Examples of compliance failures such as sanitised cases, and typologies on the misuse of FIs and DNFBPs.
- 4.24 Information of FIs and DNFBPs compliance, such as: frequency of internal AML/CTF compliance reviews, nature of breaches identified and remedial actions taken or sanctions applied, frequency and quality of AML/CTF training, time taken to provide competent authorities with accurate and complete CDD information for AML/CTF purposes, accounts/relationships rejected due to incomplete CDD information, and wire transfers rejected due to insufficient requisite information.
- 4.25 STR reporting and other information as required by national legislation, such as: number of STRs submitted, and value of associated transactions; number and proportion of STRs from different sectors; the types, nature and trends in STR filings corresponding to ML/TF risks; and average time taken to analyse the suspicious transaction before filing an STR.
- 4.26 Contextual information on types, forms and basic features of legal persons and arrangements in the jurisdiction.
- 4.27 Experiences of law enforcement and competent authorities, such as: levels of sanctions imposed for breach of information requirements, where and how basic and beneficial ownership information (including information on the settlor, trustee(s), protector and beneficiaries) is obtained, and information used in supporting investigations.
- 4.28 Typologies and examples of misuse of legal persons and arrangements, such as frequency of legal persons and arrangements being used for ML/TF, and examples of legal persons being misused for illegal activities being dismantled or struck-off.
- 4.29 Sources of basic and beneficial ownership information, such as types of public information available to FIs and DNFBPs and types of information held in company registries or by companies.
- 4.30 Information on the role played by “gatekeepers” (for example, company service providers, accountants, legal professionals) in the formation and administration of legal persons and arrangements.
- 4.31 Information on existence of legal arrangements, responses (positive and negative) to requests for basic or beneficial ownership information received from other countries and information on the monitoring of quality of assistance.

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## How to meet this objective

An effective AML/CTF regime relies on people, businesses and institutions ‘doing the right thing’ to ensure that they are not dealing with the proceeds of crime. To enable this, this Strategy envisages the creation of a mutually accountable climate, where there is an increase in the awareness in PNG of AML/CTF obligations among those who are at risk and whose businesses are vulnerable to being used by financial criminals. Furthermore, the Strategy also envisages that agencies responsible, led by the Bank of PNG, regulate and supervise AML/CTF obligations to undertake a significant increase of their duties and where there is a consistent and ongoing failure in compliance, appropriate action(s) will be taken. During the course of this strategy, PNG agencies will pay specific attention to ensuring that legal persons and arrangements such as companies, trusts and other legal persons, are prevented from being misused for ML or TF.

## Strategic Objective 5

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### Active and targeted law enforcement

Law enforcement authorities must send public signals that no one is above the law when it comes to financial crime. Law enforcement authorities must prioritise and resource anti-money laundering, proceeds of crime and counter terrorist financing activities commensurate with risks, and continue to engage in international cooperation to support these activities.

#### Key Performance Indicators

- 5.1 How effectively, and in what circumstances, are potential cases of ML identified and investigated (including through parallel financial investigations)?
- 5.2 To what extent are the types of ML activity being investigated and prosecuted consistent with the country's threats and risk profile and national AML/CFT policies?
- 5.3 To what extent are different types of ML cases prosecuted (such as foreign predicate offence, third-party laundering, stand-alone offence) and offenders convicted?
- 5.4 How effectively, proportionately and dissuasively are sanctions applied against natural or legal persons convicted of ML offences?
- 5.5 In cases where, for justifiable reasons, a ML investigation has been pursued but a conviction not secured, to what extent do countries apply other criminal justice measures? Alternative measures should not diminish the importance of, or be a substitute for, prosecutions and convictions for ML offences.
- 5.6 To what extent is confiscation of criminal proceeds, instrumentalities and property of equivalent value pursued as a policy objective?
- 5.7 How effectively do competent authorities confiscate (including repatriation, sharing and restitution) proceeds and instrumentalities of crime, and property of an equivalent value, involving domestic and foreign predicate offences and proceeds which have been moved to other countries?
- 5.8 How effectively do competent authorities manage restrained and confiscated property?
- 5.9 How effectively is confiscation of currency and bearer negotiable instruments (that are falsely declared, not declared or disclosed cross-border movements), being applied as a proportionate and dissuasive sanction by border/custom or other relevant authorities?
- 5.10 How well do the confiscation results reflect the assessment(s) of ML/TF risks and national AML/CFT policies and priorities?
- 5.11 To what extent are the different types of TF activity such as collection, movement and use of funds, prosecuted and offenders convicted? Is this consistent with the country's TF risk profile?
- 5.12 How effectively are TF cases identified and investigated, and to what extent do investigations identify the specific role played by terrorist financiers?
- 5.13 How effectively are TF investigations integrated with, and used to support, national counter-terrorism strategies and investigations (for example, identification and designation of terrorists, terrorist organisations and terrorist support networks)?
- 5.14 How effectively, proportionately and dissuasively are sanctions or measures applied against natural and legal persons convicted of TF offences?
- 5.15 Where it is not practicable to secure a TF conviction, to what extent is the objective of the outcome achieved by employing alternative criminal justice, regulatory or other measures to disrupt TF activities?

#### Key Evidence

- 5.16 Examples of investigations, prosecutions and convictions for ML activity, including rejected, significant, complex or successful cases, and cases where alternative criminal sanctions or measures are pursued.

- 5.17 Trend information on ML investigations, prosecutions and convictions, such as: number of investigations and prosecutions for ML activity; proportion of cases leading to prosecution or brought to court; number or proportion of ML convictions relating to third party laundering, stand-alone offence, self-laundering, and foreign predicate offences; types of predicate crimes involved; level of sanctions imposed for ML offences; proportion of sanctions imposed for ML compared with those for other predicate offences.
- 5.18 Examples of confiscation proceedings, including the most significant historical cases, types of confiscation orders obtained by the country and trends indicating changes in methods by which proceeds of crime is being laundered.
- 5.19 Trend and other information on confiscation, such as: number of criminal cases where confiscation is pursued; types of cases which involve confiscation; value of confiscated proceeds of crimes, instrumentalities or property of equivalent value, broken down by foreign or domestic offences, whether through criminal or civil procedures (including non-conviction-based confiscation); value of falsely declared, not declared or disclosed cross-border currency and bearer negotiable instruments confiscated; value or proportion of seized or frozen proceeds that is subject to confiscation; and value or proportion of confiscation orders realised.
- 5.20 Other relevant information including value of criminal assets seized or frozen, and amount of proceeds of crime restituted to victims, shared or repatriated.
- 5.21 Examples of TF investigations and prosecutions, including: cases where TF investigations are used to support counter-terrorism investigations and prosecutions, significant cases where (foreign or domestic) terrorists and terrorist groups are targeted, prosecuted or disrupted; cases where other criminal sanctions or measures are pursued instead of TF convictions.
- 5.22 Trend and other information on TF investigations, prosecutions and convictions, including: observed trends in TF levels and techniques; number of TF investigations and prosecutions; proportion of cases leading to TF prosecution, broken down by type of TF prosecutions and convictions (such as distinct offences, foreign or domestic terrorists); level of sanctions imposed for TF offences; sanctions imposed for TF compared with those for other criminal activity; types and level of disruptive measures applied.

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### How to meet this objective

Committing a financial crime, as committing any other violation of criminal law, can result in investigation, prosecution, imprisonment and loss of assets. PNG has significantly increased its law enforcement activities relating to financial crime over the last five years and this Strategy envisages this course continuing. The investigation and prosecution of ML, TF, proceeds of crime matters and related predicate offences is at the forefront of law enforcement agencies working in this space. This Strategy envisages the solid commitment and support provided over the years in addressing this issue is capitalised on so that more criminals face justice for the offences they commit.

In addition to traditional criminal prosecution for ML, TF and action taken under proceeds of crime, PNG's law enforcement agencies will expand their cooperation over the course of this Strategy to ensure agencies are cooperating on joint investigations, intelligence sharing and following the money, and that the system of intelligence sharing, investigation, prosecution, conviction and sanctions are working cohesively. Law enforcement agencies must also look to engage in international cooperation as required to support these objectives.

## Strategic Objective 6

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### Strengthen and upscale counter-terrorist financing, sanctions and proliferation measures

Commensurate with the risks identified, PNG agencies must prevent terrorists, terrorist organisations and terrorist financiers from raising, moving and using funds, and from abusing the not for profit sector.

#### Key Performance Indicators

- 6.1 To what extent are the different types of TF activity such as collection, movement and use of funds, prosecuted and offenders convicted? Is this consistent with the country's TF risk profile?
- 6.2 How effectively are TF cases identified and investigated, and to what extent do investigations identify the specific role played by terrorist financiers?
- 6.3 How effectively are TF investigations integrated with, and used to support, national counter-terrorism strategies and investigations (for example, identification and designation of terrorists, terrorist organisations and terrorist support networks)?
- 6.4 How effectively, proportionately and dissuasively are sanctions or measures applied against natural and legal persons convicted of TF offences?
- 6.5 Where it is not practicable to secure a TF conviction, to what extent is the objective of the outcome achieved by employing alternative criminal justice, regulatory or other measures to disrupt TF activities?
- 6.6 How effectively is the country implementing targeted financial sanctions pursuant to (i) UNSCR<sup>1</sup>1267 and its successor resolutions, and (ii) UNSCR1373 (at the supra-national or national level, whether on the country's own motion or after examination, to give effect to the request of another country)?
- 6.7 Without disrupting legitimate Non-Profit Organisation (NPO) activities, to what extent has the country implemented a targeted approach, conducted outreach, and exercised oversight in dealing with NPOs that are at risk from threat of terrorist abuse?
- 6.8 To what extent are terrorists, terrorist organisations and terrorist financiers deprived (whether through criminal, civil or administrative processes) of assets and instrumentalities related to TF activities?
- 6.9 To what extent are the above measures consistent with the overall TF risk profile?
- 6.10 How effectively does the country implement, without delay, targeted financial sanctions concerning the UNSCRs to combat financing of proliferation?
- 6.11 To what extent are funds or other assets of designated persons and entities (and those acting on their behalf or at their direction) identified and prevented from operating/executing financial transactions related to proliferation?
- 6.12 To what extent do FIs and DNFBPs comply with and understand their obligations regarding targeted financial sanctions for financing of proliferation?
- 6.13 How effectively are relevant competent authorities monitoring and ensuring compliance by FIs and DNFBPs with their obligations regarding targeted financial sanctions relating to financing of proliferation?

#### Key Evidence

- 6.14 Examples of TF investigations and prosecutions, including: cases where TF investigations are used to support counter-terrorism investigations and prosecutions, significant cases where (foreign or domestic) terrorists and terrorist groups are targeted, prosecuted or disrupted; cases where other criminal sanctions or measures are pursued instead of TF convictions.
- 6.15 Trend and other information on TF investigations, prosecutions and convictions, including: observed trends in TF levels and techniques; number of TF investigations and prosecutions; proportion of cases leading to TF prosecution, broken down by type of TF prosecutions and

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<sup>1</sup> United Nations Security Council Resolution



convictions (such as distinct offences, foreign or domestic terrorists); level of sanctions imposed for TF offences; sanctions imposed for TF compared with those for other criminal activity; types and level of disruptive measures applied.

- 6.16 Experiences of law enforcement, FIU and counter terrorism authorities, including indications of terrorist financiers researching alternative methods for raising/transmitting funds, and intelligence on terrorist organisations difficulty in raising funds.
  - 6.17 Examples of interventions and confiscation, including significant cases where terrorists, terrorist organisations or terrorist financiers are: prevented from raising, moving and using funds; their assets are confiscated; and misusing NPOs.
  - 6.18 Information on targeted financial sanctions such as: financial sanctions on persons and accounts under UNSC or other designations; designations made (relating to UNSCR1373); assets frozen; transactions rejected; time taken to designate individuals and subsequently implement asset freeze.
  - 6.19 Information on NPO supervision and monitoring activities, including NPO sector risk assessments, engagement and outreach activities to NPO sector regarding CTF measures, and trends in remedial measures and sanctions taken against NPOs.
  - 6.20 Examples of investigations and interventions relating to financing of proliferation, including breaches of sanctions investigations, and significant cases in which country has taken enforcement actions or provided assistance.
  - 6.21 Information on targeted financial sanctions relating to financing of proliferation, such as: accounts of individuals and entities subject to targeted financial sanctions; value of frozen assets and property; and time taken to designate persons and entities and subsequently freeze assets and property.
  - 6.22 Monitoring and other relevant information relating to financing of proliferation to ensure FI and DNFBP compliance with targeted financial sanctions, including monitoring and engagement activities.
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### **How to meet this objective**

Utilising the newly established legal frameworks for TF, sanctions and proliferation, in addition to other national security frameworks and institutions, agencies must cooperate to identify and deprive terrorists, terrorist organisations and terrorist support networks of resources and means to finance or support terrorist activities and organisations. In addition, individuals or entities involved in the proliferation of weapons of mass destruction must be prevented from raising, moving and using funds, consistent with the relevant UNSCRs and PNG's Sanctions regime.

## Strategic Objective 7

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### Engaging in International Cooperation to facilitate action against criminals and their assets and drive PNG's engagement in a transnational response to money laundering and terrorist financing

All agencies will engage in international cooperation consistent with AML/CTF priority areas, risks identified and in support of their effective implementation of Strategic Plan obligations.

#### Key Performance Indicators

- 7.1 To what extent and quality has the country provided constructive and timely mutual legal assistance and extradition across a range of international cooperation requests?
- 7.2 When pursuing domestic ML, associated predicate offences and TF cases which have transnational elements, to what extent has the country sought legal assistance for international cooperation in an appropriate and timely manner?
- 7.3 For AML/CTF purposes, to what extent do different competent authorities seek other forms of international cooperation to exchange financial intelligence and supervisory, law enforcement or other information with their foreign counterparts in an appropriate and timely manner?
- 7.4 How effectively do competent authorities engage with foreign jurisdictions to encourage the request and receipt of formal and informal international cooperations?
- 7.5 How effectively do competent authorities provide and respond to foreign requests for cooperation in identifying and exchanging basic and beneficial ownership information of legal persons and arrangements?
- 7.6 To what extent do the different competent authorities provide (including spontaneously) other forms of international co-operation to exchange financial intelligence and supervisory, law enforcement or other information in a constructive and timely manner with their foreign counterparts for AML/CTF purposes?

#### Key Evidence

- 7.7 Evidence of handling and making requests for international cooperation with respect to extradition, mutual legal assistance and other forms of international cooperation. For example: number, type and prioritisation of requests made, received, processed, granted, or refused relating to different competent authorities; timeliness of response; and cases of spontaneous dissemination/exchange.
- 7.8 Types and number of cooperation arrangements, including bilateral and multilateral MoUs, treaties, cooperation based on reciprocity or alternative cooperation mechanisms with other jurisdictions.
- 7.9 Examples of: (a) making requests for, and (b) providing successful international cooperation.
- 7.10 Information on investigations, prosecutions, confiscation and repatriation/sharing of assets, such as: number of ML/TF investigations/prosecutions, number and value of assets frozen and confiscated arising from international cooperation and value of repatriated/shared assets.

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#### How to meet this objective

Agencies should engage strategically in international cooperation measures including (1) adequately and effectively representing PNG to the international community including APG and FATF; (2) sharing appropriate information and intelligence between FASU and other FIUs, and between other regulatory authority counterparts internationally; (3) cooperation amongst law enforcement agencies for the detection, investigation, prosecution and implementation of sanctions, including through the use of mutual legal assistance and extradition; and (4) engaging with donors and providers of specialised AML/CTF assistance in a manner that is consistent with the risks identified in PNG's AML/CTF system and the priorities articulated in this Strategic Plan. PNG has experienced significant success in engaging with donors providing assistance which supports PNG's National Strategy and priorities at the time, this should continue so as to ensure that all assistance provided is in partnership with PNG authorities and delivered with the explicit intention of building PNG capability in priority areas as identified by the NCC and key agencies.

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## **PART TWO: THE ACTION PLAN**

This part sets out the action items to be undertaken by PNG agencies so that the objectives of this Strategic Plan may be realised from 2017-2022.

## Part Two: The Action Plan

Agencies must provide progress updates against action items below at each AML/CTF National Coordinating Committee (NCC) meeting and as requested by the NCC Secretariat. Progress will be monitored by the NCC and updates provided on an annual basis to the National Executive Council (NEC), and as required by Ministers.

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
<b>Objective 1: Driving a Nationally Coordinated Risk Based Approach to AML/CTF in PNG</b>					
<b>Lead Agency: Department of Justice and Attorney General and Bank of Papua New Guinea</b>					
1	Dr. Kalinoe A/g Secretary, DJAG  Mr. Bakani Governor, BPNG	<p>Ensure the National Coordinating Committee (NCC) on Anti-Money Laundering and Counter Terrorist Financing (AML/CTF) continues to drive key policy decisions, coordination and implementation of PNG's National AML/CTF Strategic Plan and broader approach to risk based AML/CTF reform in PNG.</p> <p>The NCC Secretariat, consisting of officers from BPNG, DJAG and others as may be necessary, should meet at a minimum 2 times a month to coordinate activities of the Technical Working Group (TWG), monitor progress of implementation of this Plan and act as the focal point for policy reform and inter-agency coordination.</p>	<p>Quarterly</p> <p>2 times a month</p>	All	<p>Rec 1 – Assessing Risks and Applying a Risk Based Approach</p> <p>Rec 2 – National Cooperation and coordination</p>
2	Dr. Kalinoe A/g Secretary, DJAG  Mr. Bakani Governor, BPNG	<p>The AML/CTF Strategy 2014-2017 should be revised and a new Strategic Plan developed. The new Strategic Plan 2017 – 2022 merges the Initial Strategy and the Strategic Implementation plan and will be endorsed by NCC.</p> <p>The Action Plan should be updated following each NCC meeting.</p> <p>The Strategic Plan should be revised annually prior to the APG meeting and reviewed in 2021/22 to coincide with outcomes of the PNG Mutual Evaluation process and monitoring of money laundering and terrorist financing (ML/TF) risks in PNG.</p>	<p>Sep 2017</p> <p>Quarterly</p> <p>Ongoing/Yearly</p>	All	Rec 1 – Assessing risks and applying a risk-based approach
3	All Heads of Agency	To enable the effective implementation of the National AML/CTF Strategic Plan, each agency with responsibilities under this action plan must report against relevant action items at NCC meetings and ensure that all activities undertaken are consistent with the priorities of the strategy and key AML/CTF risks identified.	Quarterly	All	Rec 1 – Assessing risks and applying a risk-based approach

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
4	Mr. Bakani Governor, BPNG	<p>Take the lead in the development, implementation and subsequent updating of a National Risk Assessment for AML/CTF in PNG, including keeping this risk assessment appropriately distributed to key AML/CTF stakeholders in PNG.</p> <p>The risk assessment should include ML/TF risks associated with all types of legal persons created in PNG.</p> <p>Updating the risk assessment or conducting additional risk assessments from time to time, should include consideration of changing domestic and regional circumstances, high risk sector and entity priorities, new technologies emerging in the market place and FATF listing processes. Initial risk related work should relate to the priorities identified in the risk assessment and focus on supporting agencies to undertake key mitigation strategies including those identified in the National Risk Assessment and included at Appendix A.</p>	<p>Sep 2017.</p> <p>Ongoing/Yearly</p>	All	<p>Rec 1 – National Risk Assessment</p> <p>Rec 15 – New Technologies</p>
<b>Objective 2: Operating an active, astute, professional, &amp; connected Financial Analysis &amp; Supervision Unit</b>					
<b>Lead Agency: Financial Analysis and Supervision Unit (FASU)</b>					
5	Mr. Popoitai, Director FASU	<p><u>Intelligence collection and management</u></p> <p>Continue the operation of an intelligence database to ensure that it is up to date and practical for the receipt, analysis and dissemination of financial intelligence;</p> <p>Enhance reporting from Financial Institutions (FI) and Designated Non-Financial Business Professions (DNFBPs) and ensure that all reports received are entered into the database;</p> <p>Enhance the analysis and dissemination of information and intelligence with law enforcement agencies and foreign counterparts;</p> <p>Build the capacity of FASU staff to undertake analysis and dissemination of financial intelligence;</p> <p>Continue to establish information sharing mechanism with other agencies and international authorities.</p> <p>Work with Customs to implement a mechanism for greater cooperation between FIU and customs authorities for cash seizure at the border and sharing of information.</p> <p>FASU to request and obtain information from other respective agencies, DNFBPs, FIs and other key organisations and associations to access the widest possible range of financial,</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	<p>DJAG IPA/SC OIC NGCB Customs IRC Immigration PM&amp;NEC NIO RPNGC</p>	<p>Rec 29 - Financial intelligence units</p> <p>Rec 31 - Powers of law enforcement and investigative authorities</p> <p>Rec 33 – Statistics</p> <p>Rec 34 - Guidance and feedback</p> <p>Rec 40 - Other forms of international cooperation</p>

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
		<p>administrative and law enforcement information required to properly undertake its functions. FASU should seek to enter into MoUs to cover these arrangements.</p> <p>FASU to establish a risk based approach in order to guide:</p> <ol style="list-style-type: none"> <li>Operational analysis (using information to identify specific targets and follow the trail of particular activities or linkages), and</li> <li>Strategic analysis, using information to identify money laundering and terrorist financing related trends. This may be done as part of maintaining an up to date National Risk Assessment.</li> </ol> <p>FASU to protect information by establishing clear rules and procedures to govern security and confidentiality, handling and storage, ensure staff are appropriately cleared and limit access to facilities and information. [NB: procedures are in place, but this is an ongoing requirement.]</p> <p>(Note: Action items above are part of the AML/CTF Act legislative Project Implementation Plan 2015 to 2017)</p>	<p>Ongoing/Yearly</p> <p>4<sup>th</sup> Quarter 2018</p>		
6	Mr. Popoital, Director FASU	<p><b>International cooperation</b></p> <p>FASU should actively engage in the widest range of international co-operation in relation to money laundering (ML), associated predicate offences and terrorist financing (TF). This should happen both spontaneously and upon request. FASU should establish clear and secure gateways, mechanisms and processes for timely execution of requests and safeguarding information.</p> <p>Where FASU needs bilateral or multilateral agreements, these should be negotiated in a timely way and with the widest range of foreign counterparts. FASU should otherwise comply with the general principles of Recommendation 40 with respect to the consideration of requests for assistance.</p> <p>FASU should work with other financial supervisors to ensure they have the legal basis for providing cooperation with their foreign counterparts for AML/CTF purposes including:</p> <ol style="list-style-type: none"> <li>Regulatory information</li> <li>Prudential information such as information on a Fis business activities, beneficial ownership, management and fit and properness; and</li> <li>AML/CTF information such as internal AML/CTF policies and procedures of Fis, customer due diligence (CDD) information, customer files, samples of accounts and transaction information.</li> </ol> <p>FASU should also work with financial supervisors to ensure they can conduct inquiries on behalf of foreign counterparts.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	<p>DJAG IPA/SC OIC NGCB OPP RPNCG</p>	<p>Rec 34 – Guidance and Feedback</p> <p>Rec 36 - International instruments</p> <p>Rec 37 - Mutual legal assistance</p> <p>Rec 38 - Mutual legal assistance: freezing and confiscation</p> <p>Rec 39 – Extradition</p> <p>Rec 40 - Other forms of international cooperation</p>

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
		<p>FASU to engage in international cooperation as and when required, including with respect to beneficial ownership information such as:</p> <ol style="list-style-type: none"> <li>1. Facilitating access by foreign competent authorities to basic information held by Investment Promotion Authority (IPA) Company Registry</li> <li>2. Exchanging information on shareholders; and</li> <li>3. Using various powers to obtain beneficial ownership information on behalf of foreign counterparts.</li> </ol> <p>FASU to apply for membership in the Egmont Group.</p> <p>FASU to work with DJAG to coordinate technical assistance and training needs analysis as per recommendations of National Risk Assessment.</p> <p>(Note: Action items above are part of AML/CTF Act 2015 legislative Project Implementation Plan 2015 to 2017)</p>	<p>Ongoing</p> <p>4<sup>th</sup> Quarter 2018</p> <p>Ongoing/Yearly</p>		
7	Mr. Popoital, Director FASU	<p><b>Supervision and compliance with AML/CTF Act 2015</b></p> <p>Enhance engagement with Fis and DNFBPs and provide guidance, develop AML/CTF compliance rules (as per item 9) and provide feedback on reporting quality and other obligations under the AML/CTF Act 2015;</p> <p>Ensure that Fis and DNFBPs are implementing their CDD obligations in accordance with the AML/CTF Act 2015</p> <p>Ensure the Law Society, the Institute of Accountants and other self-regulatory bodies have a program of supervision and are carrying out AML/CTF supervision of members in conjunction with FASU</p> <p>Monitor and supervise AML/CTF compliance across sectors</p> <p>Develop training and public awareness programs outreaching to Fis and DNFBPs.</p> <p>Establish and conduct a monitoring and supervisory strategy for AML/CTF that is guided and driven by the priority ML/TF risks identified for PNG, and the risk profiles of various sectors and institutions. This will include:</p> <ol style="list-style-type: none"> <li>1. Updating an AML/CTF standard operating procedure (SOP) for onsite and offsite inspections of Fis (including money changers &amp; remitters) and DNFBPs. When developing standard procedures for all supervision activities including onsite and offsite inspections, FASU to ensure that all relevant FATF Recommendations are taken into account (e.g. that activities include considerations of how FI's assess risk on new technologies and take appropriate measures to mitigate etc.)</li> <li>2. BPNG to adequately conduct AML/CTF onsite and offsite supervision and monitoring</li> </ol>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>2<sup>nd</sup> Quarter 2018</p>	<p>DJAG IPA/SC OIC NGCB</p>	<p>Rec 26 - Regulation and supervision of financial institutions</p> <p>Rec 27 - Powers of supervisors</p> <p>Rec 28 - Regulation and supervision of DNFBPs</p> <p>Oversight of: - Preventative Measures - Transparency and Beneficial Ownership of Legal Persons and Arrangements</p>

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
		<p>for compliance of the AML/CTF Act 2015.</p> <p>3. FASU to work with BPNG supervision department to ensure all money or value transfer services are licensed or registered, maintain a list of agents, and comply with relevant AML/CTF Act 2015 requirements.</p> <p>Work with other regulatory authorities to enhance PNG's AML/CTF monitoring and supervision of FIs and DNFBPs, including at a minimum:</p> <ol style="list-style-type: none"> <li>1. Develop reporting guidelines</li> <li>2. Developing key guidance and supervision tools/checklists to enable other regulatory agencies to check compliance of FIs with all FATF Recommendations e.g. CDD, internal controls, risk based policies and approaches etc.)</li> </ol> <p>FASU to maintain statistics and monitor instances of non-compliance with AML/CTF obligations and actions taken by FASU, BPNG and other regulatory agencies to promote and ensure greater compliance (e.g. letters written, court cases undertaken, registration or licenses refused or suspended etc.)</p> <p><b>Intelligence driven supervision</b>  FASU to work with supervisors to facilitate a regular supervision working group who meet quarterly to address:</p> <ol style="list-style-type: none"> <li>1. Key risks and trends in AML/CTF intelligence activities</li> <li>2. Key compliance, licensing, policy and sanctions opportunities as they arise</li> <li>3. Requirements for cooperation and information sharing to improve the compliance activities of all supervisors and the compliance culture in PNG</li> </ol> <p>The working group should include FASU, BPNG, OIC, Securities, NGCB, and IPA.</p> <p>(Note: Action items above are part of AML/CTF Act 2015 legislative Project Implementation Plan 2015 to 2017)</p>	Ongoing		
8	Mr. Popoital, Director FASU	<p><b>Terrorist Financing and Proliferation</b>  FASU to establish and carryout procedures for the dissemination of targeted financial sanctions and proliferation of weapons of mass destruction related designation lists.</p> <p>(Note: Action items above are part of UNFS Act 2015 legislative Project Implementation Plan 2015 to 2017)</p>	2 <sup>nd</sup> Quarter 2018	DJAG Sanctions Secretariat	<p>Rec 6 - Targeted financial sanctions related to terrorism &amp; terrorist financing</p> <p>Rec 7 – Targeted financial sanctions related to proliferation</p> <p>Rec 8 - Non-profit organisations</p>



No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
9	Mr. Popoital, Director FASU (guided by legal and policy support of DJAG)	<p><u>Policy, guidance and legislative instruments</u> Finalise AML/CTF Compliance Rules, ensuring they cover all obligations in the AML/CTF Act 2015 and consider appropriate action with regard to the Prudential Standard BPS253: Customer Due Diligence Standards.</p> <p>(Note: Action items above are part of AML/CTF Act 2015 legislative Project Implementation Plan 2015 to 2017)</p>	4 <sup>th</sup> Quarter 2018	DJAG	Coverage of: - Preventative Measures - Transparency and Beneficial Ownership of Legal Persons and Arrangements
10	Mr. Popoital, Director FASU	<p><u>DNFBPs</u> FASU to develop and implement short term risk based strategy to increase DNFBP awareness of AML/CTF obligations, suspicious matter reporting, and other compliance. (Note, initial activities may be small, but should commence prior to end of 2017). This should build on the awareness raising and workshops already conducted with DNFBPs.</p> <p>FASU to specifically monitor DNFBP reporting trends to determine risk profiles of DNFBP sub-sectors and take appropriate supervision/compliance action in relation to emerging risks.</p>	4 <sup>th</sup> Quarter 2017  Ongoing/Yearly	DJAG	Rec 22 –Customer Due Diligence  Rec 23 – DNFBPs: Other Measures  Rec 28 – Regulation and supervision of DNFBPs
11	Mr. Popoital, Director FASU	<p><u>Risk Assessment and profiles</u> FASU to establish and execute a plan to maintain and collate risk assessments and profiles for FIs, DNFBPs, sectors, typologies and vulnerabilities and utilise this information to ensure FASU and the broader NCC take a risk based approach, and that appropriate entities are kept aware of key risk assessment information. The findings of these assessments should drive all supervision strategies and allocation of resources.</p> <p>FASU must also establish risk communications materials to transmit key information to industry.</p>	Ongoing/Yearly  Ongoing	All agencies	Rec 1 – Assessing risks and applying a risk-based approach
12	Mr. Popoital, Director FASU	<p><u>Core Strategy and management</u> FASU should maintain a strong organisational culture and capability through:</p> <ol style="list-style-type: none"> <li>1. Ongoing strategic planning, organisational planning and prioritisation of a risk based approach to strategic decision making</li> <li>2. Appropriate resourcing</li> <li>3. Professional development programs for all staff in the key areas and priority activities outlined in this Action Plan</li> <li>4. FASU to develop detailed FASU Strategy and Work Plan for 2017-18-19 taking account of outcomes from National Strategic Plan process, National Risk Assessment, and new priorities emerging since last work planning process was undertaken. This should include a training plan for the unit.</li> <li>5. FASU to consider developing a code of conduct, and consistent with stringent</li> </ol>	Ongoing/Yearly	All agencies	

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
		<p>international requirements relating to independence and integrity of FIU staff, in recognition of the unique opportunity FASU has to create a culture of high performance, integrity and gender equality. This could take account of existing BPNG policy.</p> <p>6. FASU to expand current assistance delivered to Go-PNG in furtherance of Strategic Objective 4, to the broader private sector, including through approaching donors for assistance to be provided to FIs and DNFBPs through 'AML/CTF Policy Creation Workshops', 'Reporting workshops' etc.</p> <p>7. FASU to develop and publish Annual Report, incorporating key risk material.</p>	30 March yearly		
13	Mr. Bakani Governor, BPNG	<p><b>Financial Institutions</b> BPNG must take necessary measures to prevent criminals or their associates from holding (or being the beneficial owner of) a significant or controlling interest in a FI and from holding a management function, in a FI in their sector.</p> <p>(Note: Action items above are part of the AML/CTF Act 2015 legislative Project Implementation Plan 2015 to 2017)</p>	Ongoing	DJAG IPA/SC OIC NGCB	<p>Rec 24 - Transparency and beneficial ownership of legal persons</p> <p>Rec 25 - Transparency and beneficial ownership of legal arrangements</p>
<b>Objective 3: Refine, establish and implement required AML/CTF Legislation</b>					
<b>Lead Agency: Department of Justice and Attorney General</b>					
14	Dr. Kalinoe, A/g Secretary, DJAG	<p>Ensure implementation of the laws is effective with respective agencies responsible to implement the laws. This includes seeking assistance to ensure implementation activities listed below are fully implemented parallel to the law reform addressing irregularities among the AML/CTF laws. Ensure that adequate policy and legal advice is provided to stakeholders concerning the AML/CTF laws. Below is the outline of the plans to be undertaken for each of the 5 AML/CTF laws namely the:</p> <ol style="list-style-type: none"> <li>1. <i>Criminal Code (Money Laundering and Terrorist Financing) Amendment Act 2015</i></li> <li>2. <i>Proceeds of Crime (Amendment) Act 2015</i></li> <li>3. <i>United Nations Financial Sanctions Act 2015</i></li> <li>4. <i>Anti-Money Laundering and Counter Terrorist Financing Act 2015</i>; and</li> <li>5. <i>Mutual Assistance on Criminal Matters (Amendment) Act 2015</i>.</li> </ol>	Ongoing Implementation Activities from 3rd -4th quarter of 2017 to 1st -2nd quarter of 2018.	All	All

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
15	Dr. Kalinoe A/g Secretary, DJAG	<p><u>Implementation of the Criminal Code (Money Laundering and Terrorist Financing) Amendment 2015</u></p> <p>Implement the money laundering offence under the <i>Criminal Code (Money Laundering and Terrorist Financing) (Amendment) Act 2015</i> to ensure compliance with FATF Recommendations and United Nations Transnational Organised Crime (UNTOC), ensuring applicability to indictable and foreign indictable offences.</p> <p>Implement the terrorist financing offence under the <i>Criminal Code (Money Laundering and Terrorist Financing) Amendment Act 2015</i>.</p> <p>Implementation of all relevant predicate offences for money laundering such as arms trafficking, human trafficking and people smuggling.</p> <p>Deliver training, or assist other agencies (including FASU) in delivering training, on the requirements of the Act to FASU officers, law enforcement authorities, regulatory authorities, prosecutors and the judiciary. This includes:</p> <ol style="list-style-type: none"> <li>1. Identifying the need for training, for which agency, and the timeframes for delivery</li> <li>2. developing presentations, materials for participants (e.g. handouts, flowcharts etc.) and tools to support delivery of presentations.</li> </ol> <p><u>Legislative Amendment Process</u></p> <ol style="list-style-type: none"> <li>1. Amendments to the Criminal Code to cater for irregularities and typing errors commenced in 2016. <ol style="list-style-type: none"> <li>a. Provide Drafting Instructions and Certificate of Necessity to the NEC for endorsement</li> <li>b. Assist the Office of the Legislative Council in reviewing the <i>Criminal Code (Amendment) Bill</i>.</li> <li>c. Ensure the legislation is tabled at the Parliament right through to the gazettal process.</li> </ol> </li> <li>2. Commence implementation of the amending Act once passed.</li> </ol>	<p>Ongoing Implementation Activities from 3rd -4th quarter of 2017 to 1st -2nd quarter of 2018.</p> <p>Enactment and gazettal of Amendment Bill in December 2017.</p>	<p>FASU RPNCG OPP PM&amp;NEC Customs</p>	<p>Legislative requirements for: - Preventative Measures - Transparency and Beneficial Ownership of Legal Persons and Arrangements</p> <p>Rec 3 - Money laundering offence</p> <p>Rec 4 - Confiscation and provisional measures</p> <p>Rec 5 - Terrorist financing offence</p> <p>Rec 6 - Targeted financial sanctions related to terrorism &amp; terrorist financing</p> <p>Rec 7 – Targeted financial sanctions related to proliferation</p> <p>Rec 37 - Mutual legal assistance</p> <p>Rec 38 - Mutual legal assistance: freezing and confiscation</p>
16	Dr. Kalinoe A/g Secretary, DJAG	<p><u>Implementation of the Proceeds of Crime (Amendment) Act 2015</u></p> <p>In the interim, the regimes under the <i>Proceeds of Crime Act (POCA) 2015</i> will be implemented pending the enactment of the consolidated POCA.</p>	<p>Ongoing Implementation Activities from 3rd -4th quarter of 2017 to 1st -2nd quarter of 2018.</p>	<p>RPNCG OPP Customs FASU</p>	

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
		<p>DJAG to deliver training, or assist other agencies (including FASU) in delivering training, on the requirements of the Act to FASU officers, law enforcement authorities, regulatory authorities, prosecutors and the judiciary. This includes:</p> <ol style="list-style-type: none"> <li>1. identifying the need for training, for which agency, and the timeframes for delivery e.g. conduct an informal information session e.g. consultative forum, high priority, as appropriate, 2017;</li> <li>2. developing presentations, materials for participants (e.g. handouts, flowcharts etc.) and tools to support delivery of presentations;</li> <li>3. coordinate outreach as necessary for judiciary (for example international judicial visit to PNG, incorporating this legislation into future professional development courses for judiciary, subject to funding, donor support and logistical arrangements; and</li> <li>4. DJAG and OPP to coordinate training for magistrates on examinations.</li> </ol> <p>DJAG and Customs conduct training/awareness raising for relevant agencies/organizations on cross border transportation provisions.</p> <p><u>Legislative Amendment Process</u> DJAG to assess whether regulations are necessary to give effect to the Act.</p> <p>Repeal and replace the POCA 2005 (Principle Act) and the <i>Proceeds of Crime (Amendment) Act 2015</i> to have a Consolidated Proceeds of Crime Bill .DJAG to develop consolidated POCA in consultation with OPP.</p> <p>Amendment to cater for irregularities and typing errors has commenced in 2016.</p> <ol style="list-style-type: none"> <li>1. Develop and complete Drafting Instructions for the Consolidated Proceeds of Crime Bill</li> <li>2. Provide Drafting Instructions and Certificate of Necessity to the National Executive Council (NEC) for endorsement</li> <li>3. Assist the Office of the Legislative Council in reviewing the POCA (Consolidated) Bill.</li> <li>4. Ensure the legislation is tabled at the Parliament through to the gazettal process.</li> </ol> <p>Commence implementation of the consolidated Act.</p>	<p>Enactment and gazettal of Amendment Bill in December 2017.</p>		
17	Dr. Kalinoe A/g Secretary, DJAG	<p><u>Implementation of the United Nations Financial Sanctions Act 2015</u> Work together with the Department of Prime Minister and NEC to implement the <i>United Nations Financial Sanctions Act 2015</i> (UNFS Act 2015) establishing the administrative implementation of listing terrorist organisations and freezing their assets without delay.</p> <p>DJAG to work with RPNCG to develop Verification Form and information guideline (together with RPNCG) to verify or confirm false positives of persons or entities so designated.</p>	<p>Ongoing Implementation Activities from 3rd -4th quarter of 2017 to 1st -2nd quarter of 2018.</p>	Sanctions Secretariat FASU	

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
		<p>DJAG to support PM &amp; NEC to develop Gazettal Notice 2 x standard Gazettal Notice (for designation and another for revocation).</p> <p>DJAG to support PM &amp; NEC to develop forms for notifying the designated person and or entity 1x standard notification of designation form for designated person or entity.</p> <p>DJAG to support PM &amp; NEC to develop application for authorized dealings for designated person and or entity 1x application for authorized dealings for designated person and or entity to be attached to the notification of designation.</p> <p>DJAG to work with PM &amp; NEC to develop form for Statement of Case to be attached to interim and final designation and re-designation template.</p> <p>DJAG to work with the Centre for Judicial Excellence (PngCJE) conduct awareness on the suite of AML/CTF legislations and especially sanctions as determined by the schedule with the Secretary of the National Judicial Secretariat Services (NJSS).</p> <p>PM &amp; NEC, OPP and DJAG to work with PngCJE to workshop the process to the Judge/Judges responsible for the track on the process (including the role of the Sanctions Secretariat, basis of designation).</p> <p>Consider whether court rules need to be amended.</p> <p>PM &amp; NEC, DJAG and to develop awareness raising materials for UNFS Act 2015.</p> <p>PM &amp; NEC and DJAG to hold workshop for OPP, DJAG, BPNG, RPNGC (including police prosecutors), and any other relevant Statutory agency on the UNFS Act 2015 more so on the designation and prohibitions provisions.</p> <p><b>Legislative Amendment Process</b> Amendments for the irregularities and typographical errors have commenced in 2016.</p> <p>Develop and complete Drafting Instructions for the amendments to the UNFS Act. Provide Drafting Instructions and Certificate of Necessity to the National Executive Council (NEC) for endorsement.</p> <p>Assist the Office of the Legislative Council in reviewing the UNFS (Amendment) Bill. Ensure the legislation is tabled at the Parliament right through to the gazettal process. Commence implementation of the amending Act.</p>	<p>Enactment and gazettal of Amendment Bill in December 2017.</p>		

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
18	Dr. Kalinoe A/g Secretary, DJAG	<p><b>Implement the <u>Anti-Money Laundering and Counter Terrorist Financing Act 2015</u></b> DJAG to provide legal counsel review of instruments and materials developed, including assisting in the development and drafting of instruments and materials, as required by FASU, including:</p> <ol style="list-style-type: none"> <li>1. Forms</li> <li>2. Standard operating procedures</li> <li>3. Presentations for workshop (that have a legislative component)</li> <li>4. Awareness raising materials for financial institutions, DNFBPs, regulatory authorities and the public, e.g. flow charts, diagrams, FAQs etc.</li> <li>5. Corporate resources such as flow charts, diagrams, a Handbook on the Act, FAQs etc.</li> <li>6. AML/CTF compliance rules; and</li> <li>7. Memorandum of Understanding with Domestic and International Counterparts.</li> </ol> <p>DJAG to deliver training, or assist other agencies (including FASU) in delivering training, on the requirements of the Act to FASU officers, law enforcement authorities, regulatory authorities, prosecutors and the judiciary. This includes:</p> <ol style="list-style-type: none"> <li>1. identifying the need for training, for which agency, and the timeframes for delivery</li> <li>2. developing presentations, materials for participants (e.g. handouts, flowcharts etc.) and tools to support delivery of presentations.</li> </ol> <p><b>Legislative Amendment Process</b> Amendments to cater for irregularities and typing errors commenced in 2016.</p> <p>Provide Drafting Instructions and Certificate of Necessity to the National Executive Council (NEC) for endorsement.</p> <p>Assist the Office of the Legislative Council in reviewing the AML/CTF (Amendment) Bill 2017. Ensure the legislation is tabled at the Parliament through to the gazettal process. Commence implementation of the Amendment Act 2017 Develop AML/CTF Act Regulations.</p>	<p>Ongoing Implementation Activities from 3rd -4th quarter of 2017 to 1st -2nd quarter of 2018 (and likely ongoing).</p> <p>Enactment and gazettal of Amendment Bill in December 2017.</p> <p>Enactment and gazettal of AML/CTF Regulations by 4th quarter of 2018 (and ongoing if necessary)</p>	FASU	
19	Dr. Kalinoe A/g Secretary, DJAG	<p><b>Implement the <u>Mutual Assistance on Criminal Matters (Amendment) Act 2015</u></b> DJAG to adequately implement the Amendment Act and ensure awareness of this amendment in relation to information sharing with other enabling legislation for international cooperation purposes on criminal matters.</p>	<p>Ongoing Implementation Activities from 3rd -4th quarter of 2017 to 1st -2nd quarter of 2018.</p>	OPP	

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
<b>Objective 4: Build an interactive and responsive climate for AML/CTF Regulation, Supervision and Compliance</b>					
<b>Lead Agency: Investment Promotion Authority (IPA)</b>					
20	Ms. Kokiva, A/g Registrar of Companies	Consistent with its power and in advancement of its responsibilities under the AML/CTF Act, the Registrar of companies will return, restrict or suspend an institution's certificate of incorporation for reasons including non-compliance with AML/CTF requirements and ensure that adherence to the AML/CTF Act is a condition of licensing that is considered critical by IPA.	Ongoing	FASU DJAG	Rec 24 - Transparency and beneficial ownership of legal persons  Rec 25 - Transparency and beneficial ownership of legal arrangements  Rec 26 - Regulation and supervision of financial institutions  Rec 28 - Regulation and supervision of DNFBPs
21	Ms. Kokiva, A/g Registrar of Companies	The agency must take necessary measures to prevent criminals or their associates from holding (or being the beneficial owner of) a significant or controlling interest in a FI AND from holding a management function, in a FI in their sector.	Ongoing	FASU DJAG	Rec 24 - Transparency and beneficial ownership of legal persons  Rec 25 - Transparency and beneficial ownership of legal arrangements  Rec 26 - Regulation and supervision of financial institutions  Rec 28 - Regulation and supervision of DNFBPs

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
22	Ms. Kokiva, A/g Registrar of Companies	<p>IPA to amend the company register and confirm that all companies are registered, recording the company name, proof of incorporation, legal form and status, the address of the registered office, basic regulating powers and a list of directors. This information must be publicly available and remain updated.</p> <p>Companies must be required to maintain a register of their shareholder or members, including the number of shares held by each shareholder and categories of shares. They must also maintain information about beneficial ownership of companies. Companies must maintain the information within the country, in a place that IPA is aware of. Companies must keep this information as up to date as possible.</p> <p>IPA must ensure that companies cooperate with competent authorities when determining beneficial ownership, for example companies nominate a natural person resident in the country who is accountable to authorities etc.</p> <p>IPA must be able to obtain up to date information on company's beneficial ownership, including through accessing information held by companies such as copies of forms, audits, beneficial ownership, shareholders, Annual General Meeting resolutions etc.</p> <p>IPA to require that all companies maintain information and records for at least five years following dissolving of company – this may be by way of licensing obligation, legislation, rule or other enforceable requirement.</p> <p>In the event that companies have nominee shares and nominee directors, IPA must establish a plan for implementing FATF methodology 24.12 and monitor its progress and implementation as a key requirement of their obligations under this Strategic Plan.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	<p>FASU DJAG IRC</p>	<p>Rec 24 - Transparency and beneficial ownership of legal persons</p> <p>Rec 25 - Transparency and beneficial ownership of legal arrangements</p> <p>Rec 26 - Regulation and supervision of financial institutions</p> <p>Rec 28 - Regulation and supervision of DNFBPs</p>
23	Ms. Kokiva, A/g Registrar of Companies	<p>IPA to conduct risk assessment on company registration procedure and demonstrate how the current procedures are consistent with AML/CTF identification requirements, including how IPA validates the information received during company registration process online.</p>	<p>Ongoing</p>	<p>FASU DJAG</p>	<p>Rec 24 - Transparency and beneficial ownership of legal persons</p> <p>Rec 25 - Transparency and beneficial ownership of legal arrangements</p> <p>Rec 26 - Regulation and supervision of financial institutions</p>



No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
24	Ms. Kokiva, A/g Registrar of Companies	Working in consultation with FASU, develop key guidance and supervision tools/checklists to enable compliance checks of FIs with all obligations under the AML/CTF Act 2015 (e.g. CDD, internal controls, risk based policies and approaches etc.)	4 <sup>th</sup> Quarter 2018	FASU DJAG	Rec 28 - Regulation and supervision of DNFBPs Rec 24 - Transparency and beneficial ownership of legal persons Rec 25 - Transparency and beneficial ownership of legal arrangements Rec 26 - Regulation and supervision of financial institutions Rec 28 - Regulation and supervision of DNFBPs
25	Ms. Kokiva, A/g Registrar of Companies	IPA to undertake appropriate regulation and supervision of entities incorporated under the <i>Companies (Amendment) Act 2014</i> , to monitor and mitigate ML risks amongst legal persons. Specifically, IPA to: 1. undertake due diligence (e.g. fit and proper assessment) during company registration and ongoing supervision (including with respect to beneficial ownership), 2. prevent persons previously deregistered or whom otherwise post significant ML/TF risks, from registering another company, 3. taking action against individuals suspected of being involved in ML/TF (including potential de-registration of companies or other counter-measures).	Ongoing	FASU OIC NGCB	Rec 24 - Transparency and beneficial ownership of legal persons Rec 25 - Transparency and beneficial ownership of legal arrangements Rec 26 - Regulation and supervision of financial institutions Rec 28 - Regulation and supervision of DNFBPs



No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
		<p>Conduct outreach with NPO sector with a view to protecting the sector from abuse for criminal purposes, including raising awareness across all entities that they have obligations under the new AML/CTF Act 2015 and are required to comply with these obligations.</p> <p>Conduct supervision and monitoring of NPOs which account for a significant portion of financial resources under the control of the sector for AML/CTF purposes, including making compliance with AML/CTF a condition of NPO licensing. Establish an effective NPO registration system.</p> <p>Obtain information and provide to FASU details about the activities, types, size and other relevant features of the NPO sector, including the types of NPOs that may be particularly at risk of being misused for TF based on their activities or characteristics. Develop a project plan to implement these action items. New legislation should (at the very least) specify:</p> <ol style="list-style-type: none"> <li>1. the functions an NPO is permitted to undertake,</li> <li>2. require the registration of office holders,</li> <li>3. require annual reporting of activities and financial arrangements,</li> <li>4. create a public data base of NPOs,</li> <li>5. prohibit commercial activities being undertaken by NPOs,</li> <li>6. prescribe when they may be given tax free status, and</li> <li>7. where NPOs receive government grants appropriate reporting and audit controls are mandated.</li> </ol>	<p>Ongoing</p> <p>Ongoing</p> <p>4<sup>th</sup> Quarter 2018</p> <p>4<sup>th</sup> Quarter 2018</p>		
<b>Lead Agency: PNG Customs Service</b>					
28	Mr. Paul, Chief Commissioner	<p>Develop SOPs to implement the declaration system for incoming and outgoing cross border transportation of currency and bearer negotiable instruments.</p> <p>Ensure continuation of awareness on the declaration system to travellers at the borders, National Airport Corporation, Customs border officers, FASU officers and other relevant stakeholders. E.g. place posters at airports and ports, advertise requirements on airport screens advertise new requirements in airline magazine and/or on seat screens, standardize in-flight airline announcement advising passengers of new requirements, incorporate requirements into customs trainings.</p> <p>Customs to maintain statistics on increasing usage of POCA powers to seize cash at the borders and undertake required processes. Customs to demonstrate progress in conducting compliance activities and undertaking enforcement action against entities suspected to be in breach of AML/CTF obligations, including keeping statistics in relation to this.</p> <p>Customs must undertake targeted document/container verification and prosecution where the documentation is fraudulent.</p>	<p>4<sup>th</sup> Quarter 2017</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	<p>FASU</p> <p>DJAG</p> <p>OPP</p> <p>RPNGC</p>	<p>Rec 32 - Cash couriers</p>

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
29	Mr. Paul, Chief Commissioner	Collect declaration and disclosure for cross border transaction of cash and bearer negotiable instruments.  Provide reports to FASU on cross border currency movements, collecting statistics and conduct trainings. Cross Border Movement of Currency and Valuables (CMCV) Form to be in operation	Ongoing  3 <sup>rd</sup> Quarter 2017	DJAG, FASU	Rec 32 - Cash couriers
30	Mr. Paul, Chief Commissioner	Ensure that Customs can effectively share information with other domestic agencies and foreign counterparts on AML/CTF issues through the MoUs arrangement with FASU and the RPNGC.  Customs to demonstrate enforcement and compliance activities	Ongoing/Yearly  Ongoing/Yearly	RPNGC, DJAG FASU	Rec 2 – National Cooperation and coordination  Rec 30 - Responsibilities of law enforcement and investigative authorities  Rec 31 - Powers of law enforcement and investigative authorities
<b>Lead Agency: National Gaming Control Board (NGCB)</b>					
31	Ms. Agon, CEO	Agency to use existing powers to withdraw, restrict or suspend an institution's licence for reasons including non-compliance with AML/CTF requirements. Given AML/CTF requirements are a condition of licensing process, the Agency to demonstrate how this is monitored and when action is taken.  Regulate and supervise casinos to demonstrate enforcement and compliance activities	Ongoing	FASU DJAG	Rec 24 - Transparency and beneficial ownership of legal persons  Rec 25 - Transparency and beneficial ownership of legal arrangements  Rec 28 - Regulation and supervision of DNFBPs  Rec 24 - Transparency and beneficial ownership of legal persons
32	Ms. Agon, CEO	The agency must take necessary measures to prevent criminals or their associates from holding a (or being the beneficial owner of) a significant or controlling interest in a FI AND from holding a management function, in a FI in their sector.	Ongoing	FASU DJAG IPA/SC	Rec 24 - Transparency and beneficial ownership of legal persons

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
33	Ms. Agon, CEO	Working in consultation with FASU, develop key guidance and supervision tools/checklists to enable compliance checks of FIs with all obligations under the AML/CTF Act 2015 (e.g. CDD, internal controls, risk based policies and approaches etc.)	4 <sup>th</sup> Quarter 2018	FASU DJAG	Rec 25 - Transparency and beneficial ownership of legal arrangements Rec 28 - Regulation and supervision of DNFBPs Rec 24 - Transparency and beneficial ownership of legal persons Rec 25 - Transparency and beneficial ownership of legal arrangements Rec 28 - Regulation and supervision of DNFBPs
34	Ms. Agon, CEO	Prepare enforceable AML/CTF regulations and practical guidelines to ensure that when a casino is licensed under the Casino Act which is in draft stages, it cannot be abused for ML and or TF. The new Casino Act will incorporate ML/TF legislations. Particular emphasis will be placed on junkets.  Demonstrate progress in conducting monitoring and compliance activities and undertaking investigation and enforcement actions against PEPs and foreign nationals with junkets over the K1million mark will be recorded and simultaneously reported to FASU including entities suspected to be in breach of AML/CTF obligations, including keeping statistics in relation to this. Due consideration will be given to CDD in all transactions with the Casino.	4 <sup>th</sup> Quarter 2019	DJAG FASU	Rec 24 - Transparency and beneficial ownership of legal persons Rec 25 - Transparency and beneficial ownership of legal arrangements Rec 28 - Regulation and supervision of DNFBPs

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
<b>Lead Agency: Securities Commission of PNG (SCPNG)</b>					
35	Mr. Hnanguie, Chairman	Consistent with its current powers and in advancement of the implementation of the AML/CTF Act, the agency will exercise the power to withdraw, restrict or suspend an institution's licence for reasons including non-compliance with AML/CTF requirements and ensure that compliance with AML/CTF requirements is a condition of licensing that is considered crucial.	Ongoing	FASU DJAG	Rec 24 - Transparency and beneficial ownership of legal persons  Rec 25 - Transparency and beneficial ownership of legal arrangements  Rec 26 - Regulation and supervision of financial institutions  Rec 27 - Powers of supervisors
36	Mr. Hnanguie, Chairman	The agency must take necessary measures to prevent criminals or their associates from holding (or being the beneficial owner of) a significant or controlling interest in a FI AND from holding a management function, in a FI in their sector.	Ongoing	FASU DJAG	Rec 24 - Transparency and beneficial ownership of legal persons  Rec 25 - Transparency and beneficial ownership of legal arrangements
37	Mr. Hnanguie, Chairman	Working in consultation with FASU, develop key guidance and supervision tools/checklists to enable compliance checks of FIs with all obligations under the AML/CTF Act 2015 (e.g. CDD, internal controls, risk based policies and approaches etc. etc.)	4 <sup>th</sup> Quarter 2018	FASU DJAG  FASU, DJAG and IRC	Rec 24 - Transparency and beneficial ownership of legal persons  Rec 25 - Transparency and beneficial ownership of legal arrangements

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
38	Mr. Hnanguie, Chairman	<p>Develop structures and tools appropriate to ensure it has dedicated resources to supervise its regulated entities.</p> <p>SCPNG to implement the necessary obligations under the AML/CTF Act 2015 to ensure that its regulated industry has an appropriate compliance management arrangement, independent audit functions and requirements for screening new employees. Demonstrate progress in conducting compliance activities and undertaking enforcement action against entities suspected to be in breach of AML/CTF obligations, including keeping statistics in relation to this.</p>	Ongoing	FASU DJAG	<p>Rec 26 - Regulation and supervision of financial institutions</p> <p>Rec 27 - Powers of supervisors</p> <p>Rec 24 - Transparency and beneficial ownership of legal persons</p> <p>Rec 25 - Transparency and beneficial ownership of legal arrangements</p> <p>Rec 26 - Regulation and supervision of financial institutions</p> <p>Rec 27 - Powers of supervisors</p>
39	Mr. Hnanguie, Chairman	<p>SCPNG to ensure compliance with AML/CTF Act 2015, including through the application of clear administrative sanctions on its regulated entities for AML/CTF breaches applicable to individuals responsible for entities.</p> <p>SCPNG has also developed necessary legislation to cover for this action item hence gazettal and implementation of such legislation is also key.</p> <p>SCPNG and FASU to work together in developing the necessary materials to implement the AML/CTF Act 2015 obligations.</p> <p>SCPNG to complete review of 3 new pieces of legislation by International Securities Organisation Cooperation (ISCO):</p> <ol style="list-style-type: none"> <li>Securities Commission Act 2013,</li> <li>Capital Markets Act 2013 and</li> <li>Central Depository Act 2013.</li> </ol>	<p>Ongoing</p> <p>4<sup>th</sup> Quarter 2018</p> <p>Ongoing</p>	FASU DJAG	<p>Rec 24 - Transparency and beneficial ownership of legal persons</p> <p>Rec 25 - Transparency and beneficial ownership of legal arrangements</p> <p>Rec 26 - Regulation and supervision of financial institutions</p> <p>Rec 27 - Powers of supervisors</p>

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
		SCPNG to ensure gazettal and implementation of the above legislative framework.	Ongoing		Rec 28 - Regulation and supervision of DNFBPs
<b>Lead Agency: Office of Insurance Commissioner (OIC)</b>					
40	Mr. Samuel, A/g Insurance Commissioner	Agency to confirm they have the power to withdraw, restrict or suspend an institution's license for reasons including non-compliance with AML/CTF requirements (e.g. that AML/CTF is a condition of licensing, or that other action may be taken.)	Ongoing	FASU DJAG	Recommendations under: Preventative Measures  Rec 26 - Regulation and supervision of financial institutions  Rec 27 - Powers of supervisors
41	Mr. Samuel, A/g Insurance Commissioner	The agency must take necessary measures to prevent criminals or their associates from holding (or being the beneficial owner of) a significant or controlling interest in a FI AND from holding a management function, in a FI in their sector.	Ongoing	FASU DJAG	Rec 24 - Transparency and beneficial ownership of legal persons  Rec 25 - Transparency and beneficial ownership of legal arrangements
42	Mr. Samuel, A/g Insurance Commissioner	Working in consultation with FASU, develop key guidance and supervision tools/checklists to enable compliance checks of financial institutions with all obligations under the AML/CTF Act 2015 (e.g. CDD, internal controls, risk based policies and approaches etc.)	4 <sup>th</sup> Quarter 2018	FASU DJAG	Recommendations under: Preventative Measures  Rec 26 - Regulation and supervision of financial institutions  Rec 27 - Powers of supervisors



No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
43	Mr. Samuel, A/g Insurance Commissioner	<p>In relation to life insurance policies, FIs must be reminded to take reasonable measures to determine whether the beneficiaries/beneficial owners of the beneficiary, are Politically Exposed Persons (PEPs) and where higher risks are identified, they are required to inform senior management before payout and consider making a suspicious matter report under the AML/CTF Act 2015.</p> <p>OIC should ensure this is communicated to industry, for example to the Insurance Council – noting that this is in addition to all the other AML/CTF requirements the industry must comply with.</p>	<p>Ongoing</p> <p>Ongoing</p>	FASU	Rec 12 – Politically Exposed Persons
44	Mr. Samuel, A/g Insurance Commissioner	<p>To develop structures and tools appropriate to ensure it has dedicated resources to supervise its regulated entities.</p> <p>OIC to implement the necessary obligations under the AML/CTF Act 2015 to ensure that it's regulated industry has an appropriate compliance management arrangement, independent audit functions and requirements for screening new employees.</p> <p>OIC and FASU to work together in developing the necessary materials to implement the AML/CTF Act obligations. FASU and OIC to work together to develop onsite SOP for supervising the OIC regulated entities.</p> <p>AML/CTF supervisory powers to require regulated entities to have in place adequate internal controls, compliance &amp; audit functions that are proportionate to the size of each regulated entities.</p>	4 <sup>th</sup> Quarter 2018	FASU DJAG	<p>Recommendations under: Preventative Measures</p> <p>Rec 26 - Regulation and supervision of financial institutions</p> <p>Rec 27 - Powers of supervisors</p>
45	Mr. Samuel, A/g Insurance Commissioner	<p>Continue to supervise sector to comply with AML/CTF obligations including CDD, internal controls, compliance and audit. Demonstrate progress in conducting compliance activities and undertaking enforcement action against entities suspected to be in breach of AML/CTF obligations, including keeping statistics in relation to this.</p>	Ongoing	FASU	<p>Recommendations under: Preventative Measures</p> <p>Rec 26 - Regulation and supervision of financial institutions</p> <p>Rec 27 - Powers of supervisors</p>

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
<b>Lead Agency: Internal Revenue Commission (IRC)</b>					
46	Ms. Palaso, Commissioner General	Continue cooperation with FASU and other law enforcement agencies to combat ML and TF including through increased information sharing, formal and informal cooperation on preliminary requests, assistance and guidance on utilisation of tax strategy and advice to trace and combat ML and TF.	Ongoing	FASU IPA OPP RPNGC	Multiple
47	Ms. Palaso, Commissioner General	IRC to also engage in increased cooperation with other regulatory agencies. IRC to undertake ML/TF risk assessment prior to issuing tax clearance certificate for the export of cash. This assessment must be provided to BPNG when requesting clearance.	Ongoing	FASU	
48	Ms. Palaso, Commissioner General	IRC to develop a strategy for reducing tax fraud and related criminal offences, including through cross referencing tax returns with company annual reports to identify possible tax fraud and other targeted actions. With respect to good and services tax (GST), IRC to: <ol style="list-style-type: none"> <li>1. Ensure entities registered for GST purposes meet the relevant criteria,</li> <li>2. Run checks on claims where there is a trend of claims for GST refunds (eg GST on purchases not offset by GST collected on sales),</li> <li>3. Review the procedures and processes to identify deficiencies and address these,</li> <li>4. Undertake targeted reviews of GST registration and claims, and</li> <li>5. Act against those found to be defrauding the system with criminal prosecutions.</li> </ol> <p>Demonstrate progress in conducting compliance activities and undertaking enforcement action against entities suspected to be in breach of AML/CTF obligations, including keeping statistics in relation to this.</p>	4 <sup>th</sup> Quarter 2018	FASU DJAG	
<b>Lead Agency: National Intelligence Organisation (NIO)</b>					
49	Mr. Umba, A/g Director	Assist in the implementation of the AML/CTF legislation where intelligence gathering and information sharing to enforce compliance with the AML/CTF legislation. Assist in gathering and sharing relevant intelligence particularly with respect to supporting the enforcement of the anti-money laundering and counter terrorist financing regime.  Engage and share information with FASU and the NCC in terms of the risks, threats and vulnerabilities that are associated with money laundering and terrorist financing pertaining to its principle powers.	Ongoing  Ongoing  Ongoing	FASU Sanctions Secretariat DJAG	

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
<b>Objective 5: Active and targeted law enforcement</b>					
<b>Lead Agency: Royal PNG Constabulary (RPNCG)</b>					
50	Mr. Baki Commissioner	Implement a plan for RPNCG's management of restrained and forfeited assets, seek international donor assistance to develop and implement a plan for RPNCG's asset management, secure funding to enable proper asset management and consider outsourcing the management of assets to a suitably independent and competent agent to act on behalf of the Commissioner and the State.	4 <sup>th</sup> Quarter 2018	DJAG FASU OPP	Rec 4 - Confiscation and provisional measures
51	Mr. Baki Commissioner	RPNCG to take into account the following requirements in any law reform undertaken for the Police Act – Compulsory measures for: <ol style="list-style-type: none"> <li>1. seizing and obtaining evidence related to financial crime</li> <li>2. undercover operations</li> <li>3. intercepting communications</li> <li>4. accessing computer systems</li> <li>5. controlled deliveries</li> <li>6. identifying assets without prior notification to the owner</li> <li>7. abilities to request relevant information from FASU (noting this is most likely covered by MoU.)</li> </ol>	2019	DJAG FASU OPP	Rec 31 - Powers of law enforcement and investigative authorities
52	Mr. Baki Commissioner	RPNCG to adequately investigate ML, proceeds of crime and TF cases, and maintain statistics in relation to: <ol style="list-style-type: none"> <li>1. ML/TF investigations, prosecutions and convictions</li> <li>2. Cash seizures utilising powers under the POCA</li> <li>3. Property frozen; seized and confiscated (including whether cases have been conviction or non-conviction based)</li> <li>4. Usage of coercive hearings and other relevant powers under the Act</li> <li>5. Mutual Legal Assistance or other international requests for cooperation made and received</li> <li>6. Sanctions applied against natural and legal persons who fail to comply with AML/CFT requirements</li> </ol> <p><b>Intelligence driven investigation and coordination</b>  FASU to work with RPNCG to facilitate a regular law enforcement working group who meet monthly to address:</p> <ol style="list-style-type: none"> <li>1. Key risks and trends in AML/CTF intelligence activities</li> <li>2. Key investigation opportunities as they arise</li> <li>3. Requirements for information sharing and strategies to advance investigations</li> <li>4. Setting up and progress of taskforces to investigate serious crime</li> </ol>	Ongoing	DJAG FASU OPP Sanctions Secretariat Customs NIO IRC Immigration	Rec 3 - Money laundering offence  Rec 4 - Confiscation and provisional measures  Rec 5 - Terrorist financing offence  Rec 6 - Targeted financial sanctions related to terrorism & terrorist financing  Rec 7 – Targeted financial sanctions related to proliferation

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
		<p>The working group include RPNGC, Forestry, Fisheries, Customs, OPP, NIO, OSCA and Sanctions Secretariat, IRC, Immigration. Each agency to nominate a standing member to the group.</p> <p>RPNGC to cooperate on proceeds of crime, ML and TF cases, including through cooperation with Customs, IRC, OPP, BPNG, PM&amp;NEC, OSCA and other relevant stakeholders domestically and internationally.</p>	Ongoing		Rec 32 - Cash couriers
<b>Lead Agency: Office of Public Prosecutor (OPP)</b>					
53	Mr. Kaluwin Public Prosecutor	<p>Adequately investigate and prosecute proceeds of crime and ML and terrorism.</p> <p>Prioritise the criminal investigation and subsequent prosecution of predicate offences relating to counterfeit products as per the national risk assessment, and pursue the recovery of proceeds of crime as appropriate.</p> <p>Work with the RPNGC and other key agencies to facilitate referrals to OPP for ML, TF and POC cases.</p> <p>Maintain adequate resourcing and staffing commensurate with the risks posed by proceeds of crime, ML and TF, to ensure that PNG can adequately undertake law enforcement action in these circumstances.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing/Yearly</p>	<p>RPNGC FASU Sanctions Secretariat</p>	<p>Rec 3 - Money laundering offence</p> <p>Rec 4 - Confiscation and provisional measures</p> <p>Rec 5 - Terrorist financing offence</p> <p>Rec 6 - Targeted financial sanctions related to terrorism &amp; terrorist financing</p> <p>Rec 7 – Targeted financial sanctions related to proliferation</p> <p>Rec 32 - Cash couriers</p>
54	Mr. Kaluwin Public Prosecutor	<p>Demonstrate progress in conducting compliance activities and undertaking enforcement action against entities suspected to be in breach of AML/CTF obligations, including keeping statistics in relation to this.</p> <p>Establish a mechanism to collect statistics by integrating proceeds of crime and ML &amp; TF into case management systems across PNG offices. Collect statistics specifically on:</p> <ol style="list-style-type: none"> <li>1. Number of proceeds of crime restraint actions</li> <li>2. Number of proceeds of crime forfeiture actions</li> <li>3. Amount of money under restraint</li> <li>4. Amount of money forfeited</li> </ol>	<p>Ongoing</p> <p>Ongoing</p>	<p>RPNGC DJAG FASU</p>	<p>Rec 3 - Money laundering offence</p> <p>Rec 4 - Confiscation and provisional measures</p> <p>Rec 5 - Terrorist financing offence</p>

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
		<p>5. Number of money laundering prosecutions (including convictions secured)</p> <p>6. Number of Terrorist Financing cases prosecuted</p> <p>This information is to be provided to DJAG on a monthly basis and should be broken down to specify crime types and type of proceeds of crime action. This information is then used for international reporting obligations to FATF on AML/CTF and APG.</p>			<p>Rec 6 - Targeted financial sanctions related to terrorism &amp; terrorist financing</p> <p>Rec 7 – Targeted financial sanctions related to proliferation</p> <p>Rec 32 - Cash couriers</p>
55	Mr. Kaluwin Public Prosecutor	<p>Ensure that the Proceeds of Crime and International Cooperation Unit is:</p> <ol style="list-style-type: none"> <li>adequately staffed,</li> <li>has adequate resources to support prosecutions,</li> <li>positioned to deal with an increasing caseload arising out of the increase of capacity in the FIU, potential referrals from FASU, Customs, IRC and ICAC.</li> </ol>	Ongoing/Yearly	RPNGC	<p>Rec 3 - Money laundering offence</p> <p>Rec 4 - Confiscation and provisional measures</p> <p>Rec 37 - Mutual legal assistance</p> <p>Rec 38 - Mutual legal assistance: freezing and confiscation</p>
56	Mr. Kaluwin Public Prosecutor	<p>Enhance the capacity of staff to undertake TF offence related and sanctions related prosecutions.</p> <p>Enhance relationships with Sanctions Secretariat, PM&amp;NEC OSCA and other key agencies in relation to combating TF and proliferation of weapons of mass destruction.</p>	Ongoing  Ongoing	Sanctions Secretariat FASU DJAG	<p>Rec 3 - Money laundering offence</p> <p>Rec 4 - Confiscation and provisional measures</p> <p>Rec 5 - Terrorist financing offence</p> <p>Rec 6 - Targeted financial sanctions related to terrorism &amp; terrorist financing</p>

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
					<p>Rec 7 – Targeted financial sanctions related to proliferation</p> <p>Rec 32 - Cash couriers</p> <p>Rec 37 - Mutual legal assistance</p> <p>Rec 38 - Mutual legal assistance: freezing and confiscation</p>
<b>Lead Agency: National Fisheries Authority (NFA)</b>					
57	Mr. Kasu, Managing Director	<p>Conduct a sector risk assessment to identify key vulnerabilities in the registration and compliance processes undertaken by entities registered with the fisheries authority which may lead to abuse of systems for purposes of ML/TF.</p> <p>Establish and implement a strategy for mitigation in cooperation with NCC agencies and in accordance with most significant risks identified.</p> <p>Demonstrate progress in conducting compliance activities and undertaking enforcement action against entities suspected to be in breach of AML/CTF obligations, including keeping statistics in relation to this.</p>	<p>Ongoing/Yearly</p> <p>Ongoing</p> <p>Ongoing</p>	<p>FASU</p> <p>DJAG</p>	<p>Rec 1 – Assessing Risks and Applying a Risk Based Approach</p> <p>Rec 3 - Money laundering offence</p> <p>Rec 30 - Responsibilities of law enforcement and investigative authorities</p> <p>Rec 31 - Powers of law enforcement and investigative authorities</p>
<b>Lead Agency: PNG Forest Authority (PNGFA)</b>					
58	Mr. Sabuin, Managing Director	<p>Conduct a sector risk assessment to identify key vulnerabilities in the registration and compliance processes undertaken by entities registered with the forestry authority which may lead to abuse of systems for purposes of ML/TF.</p> <p>Establish and implement a strategy for mitigation in cooperation with NCC agencies and in accordance with most significant risks identified.</p>	<p>Ongoing/Yearly</p> <p>Ongoing</p>	<p>FASU</p> <p>DJAG</p>	<p>Rec 1 – Assessing Risks and Applying a Risk Based Approach</p> <p>Rec 3 - Money laundering offence</p>

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
		Demonstrate progress in conducting compliance activities and undertaking enforcement action against entities suspected to be in breach of AML/CTF obligations, including keeping statistics in relation to this.	Ongoing		Rec 30 - Responsibilities of law enforcement and investigative authorities Rec 31 - Powers of law enforcement and investigative authorities
<b>Objective 6: Strengthen and upscale counter-terrorist financing, sanctions and proliferation measures</b>					
59	All	<p>Interagency cooperation to establish a risk based approach: In addition to action items to be undertaken as part of the implementation of the Sanctions Act, a risk based strategy to counter-terrorist financing, sanctions and proliferation should be established and implemented, addressing the following priority mitigation measures:</p> <ol style="list-style-type: none"> <li>1. Effectively applying the declaration system for cross-border cash transfers. This requires enforcement at the ports and airports of the declaration requirements and collection and analysis of the reports.</li> <li>2. Increased awareness of and responding to <ol style="list-style-type: none"> <li>a. cross-border transfers of cash,</li> <li>b. carriage of cash into and out of PNG by passengers on vessels or through airports,</li> <li>c. the use of smuggling as a source of TF, and</li> <li>d. the potential for cross-border gun sales to be used to fund terrorism within Indonesia,</li> </ol> </li> <li>3. Continued monitoring of domestic and international funds transfers by parties who might be listed on UNSCR lists or subject to sanctions.</li> <li>4. Ensuring the legislative framework for identifying and notifying groups and individuals covered by UN designations in relation to terrorism and other sanctions are operating effectively.</li> <li>5. Ensuring as part of regular supervision activities that FI and DNFBPs are aware of and meeting their obligations in relation to sanction lists and other reporting.</li> <li>6. Ensuring reporting entities are focusing on fund transfers through PNG from or to high risk jurisdictions.</li> <li>7. Provision of information to FI and DNFBPs when new TF typologies or activities are identified in the region.</li> </ol> <p>Developing a clear-cut strategy on how to address AML/CTF in the medium to long term, using the NRA as a basis for priority setting and resource allocation. This will assist agencies to address ML, Terrorism and TF risks.</p>	Ongoing/Yearly	All agencies	

No	Senior Official Responsible	Action	Timeline	Other agencies	FATF Rec number
<b>Lead Agency: Sanctions Secretariat</b>					
60	Mr. Kaib A/g Director Office of Security Co-ordination and Assessment, PM & NEC	<p><b>Sanctions Secretariat</b> Establish policies and procedures to implement UNSCR's 1267 and 13773 and successor resolutions. Support the implementation of the legal and regulatory framework for SR111 through guidance and outreach to ensure the immediate freezing of funds in keeping with UNSCR1267 1373 and successor resolutions.</p> <ol style="list-style-type: none"> <li>1. Finalise Procedural Guide for Sanctions Secretariat ( inclusive of templates necessary for the operationalisation of the Secretariat)</li> <li>2. Set up generic e-mail for Sanctions Secretariat</li> <li>3. Set up generic e-mail for intelligence communication sharing with FASU and other intelligence authorities</li> <li>4. Develop and maintaining excel spread sheet for UN and Domestic Listing</li> <li>5. Develop Forms for the Designation, re-designation, revocation, reporting, verification, authorised dealings processes and procedures.</li> <li>6. Collaborate with the National Judicial Services Secretariat on the sanctions applications</li> <li>7. Training on the Procedural Guide to the Sanctions Secretariat and other relevant agencies (including FI's and DNFBP's and how they report to FASU)</li> </ol> <p>The Sanctions Secretariat must keep adequate statistics and report progress to the NCC with respect to:</p> <ol style="list-style-type: none"> <li>1. Request for domestic and international listings</li> <li>2. Accounts frozen</li> <li>3. Communications with financial institutions</li> <li>4. Other KPIs as set out in the National Strategy and supporting evidence requirements.</li> </ol>	4 <sup>th</sup> Quarter 2017	DJAG FASU	<p>Recommendation 6 – Targeted Financial sanctions related to terrorism and terrorist financing</p> <p>Recommendation 7 – Targeted financial sanctions related to the proliferation of weapons of mass destruction.</p>
<b>Objective 7: Engaging in International Cooperation to facilitate action against criminals and their assets and drive PNG's engagement in a transnational response to money laundering and terrorist financing</b>					
<i>Please note that action items relating to this objective are integrated throughout each agency's responsibilities and the plan above.</i>					



Appendix A: Summary of priority mitigation measures emerging from PNG's National Risk Assessment

Risk Theme	Mitigation priorities	Action item #s
Terrorist financing	<ul style="list-style-type: none"> <li>▪ Effectively applying the declaration system for cross-border cash transfers. This requires enforcement at the ports and airports of the declaration requirements and collection and analysis of the reports.</li> <li>▪ Increased awareness of and responding to               <ul style="list-style-type: none"> <li>○ cross-border transfers of cash,</li> <li>○ carriage of cash into and out of PNG by passengers on vessels or through airports,</li> <li>○ the use of smuggling as a source of TF, and</li> <li>○ the potential for cross-border gun sales to be used to fund terrorism within Indonesia.</li> </ul> </li> <li>▪ Continued monitoring of domestic and international funds transfers by parties who might be listed on UNSCR lists or subject to sanctions.</li> <li>▪ Ensuring the legislative framework for identifying and notifying groups and individuals covered by UN designations in relation to terrorism and other sanctions are operating effectively.</li> <li>▪ Ensuring as part of regular supervision activities that the institutions are aware of and meeting their obligations in relation to sanction lists and other reporting.</li> <li>▪ Ensuring institutions are focusing on fund transfers through PNG from or to high risk jurisdictions.</li> <li>▪ Provision of information to institutions when new TF typologies or activities are identified in the region.</li> <li>▪ Developing a clear-cut strategy on how to address AML/CTF in the medium to long term, using the NRA as a basis for priority setting and resource allocation. This will assist agencies to address ML, Terrorism and TF risks.</li> </ul>	4 – 19, 20 – 27, 60
GST Fraud	<ul style="list-style-type: none"> <li>▪ Ensuring entities registered for GST purposes meet the relevant criteria,</li> <li>▪ Run checks on claims where there is a trend of claims for GST refunds (eg GST on purchases not offset by GST collected on sales),</li> <li>▪ Review the procedures and processes to identify deficiencies and address these,</li> <li>▪ Undertake targeted reviews of GST registration and claims, and</li> <li>▪ Act against those found to be defrauding the system with criminal prosecutions.</li> </ul>	46-48
Revenue Fraud	<ul style="list-style-type: none"> <li>▪ Ensuring the exchange of information between the IRC, IPA, FASU and Customs.</li> <li>▪ IRC should, in conjunction with the RPNCG and the OPP, undertake criminal prosecutions for tax and GST fraud rather than relying on non-payment of fraudulent claims or the use of civil recovery processes.</li> <li>▪ All international funds transfers must be reported to the BPNG. This information is reported using part of the form used by the customer to request the transfer. This information is converted by the bank into an electronic message to allow the transfer to be processed. The banks should provide to BPNG an electronic message (with same data as contained in the SWIFT message, to save BPNG manually rekeying the same data.</li> <li>▪ This data (which identifies the sender) should be made available to the IRC and should identify same party transfers in excess of the tax clearance requirements.</li> <li>▪ Encourage IRC to cross reference tax returns with company annual reports to identify possible tax fraud. DOUBLE CHECK</li> <li>▪ Customs undertaking targeted document/container verification and prosecution where the documentation is fraudulent.</li> </ul>	46-48

<b>Bribery and Corruption</b>	<ul style="list-style-type: none"> <li>Working with off shore partners through information sharing with other FIUs and using mutual legal assistance processes to locate, freeze and recover criminal proceeds,</li> <li>Increasing the capacity of FASU, RPNCG and other agencies to carry out financial investigations to assist in proceeds of crime recovery and criminal prosecution,</li> <li>Using Proceeds of Crime legislation to locate, freeze and recover corrupt payments and stolen funds,</li> <li>Using legislation such as the Income Tax Act to deal with the recovery of proceeds where this can be done more efficiently that using proceeds of crime laws,</li> <li>Enhancement of the NFACD within RPNCG, and</li> <li>Enhanced Customs scrutiny of the movement of goods into and out of PNG to ensure that goods have the appropriate approvals and that taxation is paid.</li> </ul>	4 – 19, 28-30, 50-52, 53-56
<b>Sale of Counterfeit Products</b>	<ul style="list-style-type: none"> <li>Determining which targets are of higher priority and focusing resources on those generating large amounts of proceeds, for example, cigarettes.</li> <li>Combining both prosecutions of the predicate offences with recovery of proceeds of crime.</li> </ul>	28-30, 53-56
<b>Environmental Crime</b>	<ul style="list-style-type: none"> <li>Full application of the current legislative regime,</li> <li>Increase the use of criminal prosecution rather than only administrative sanctions where breaches occur.</li> <li>As part of risk assessment processes, consider how best to trace and locate, freeze and recover proceeds of illegal logging and fishing domestically and internationally.</li> </ul>	53-56, 57 and 58
<b>Unauthorised cross-border movements of people</b>	<ul style="list-style-type: none"> <li>Effective sanctions for those involved in bringing in workers without valid visas need to be imposed.</li> </ul>	5 and 52
<b>Illicit International Value Transfers</b>	<ul style="list-style-type: none"> <li>Regular analysis by FASU of the trade data collected by the BPNG, Customs and other agencies with the flow of international fund transfers. This could involve working closely with the banks to examine unusual transfer volumes to ensure that these are consistent with the known business activities of the originating and receiving parties,</li> <li>Encourage the banks (through regular inspections) to actively examine international fund transfers (IFTs),</li> <li>Use the data reported to BPNG to enhance the operation of the tax clearance certificate system,</li> <li>Focus on transfers carried out by lawyers and accountants through trust accounts where the beneficiary of the transfer is not identified. In this regard work with the banks and FIUs in the sending/receiving country if there are concerns about the transfers,</li> <li>Ensure, as part of the supervision program, that reporting entities are collecting, retaining and updating customer data including the identity of company office holders and beneficial owners and the nature of the business,</li> <li>Revising the legislation for NPOs, culling the register of all Inactive Associations and ensuring regular reporting of office holders and financial statements,</li> <li>Where illicit transfers are discovered, FASU should work closely with the RPNCG and the OPP to prosecute offenders and to recover transferred funds, and</li> <li>Develop and maintain close working relationships with neighbouring FIUs.</li> </ul>	4 – 19, 50 – 52, 53-56

<p><b>Cross-border cash flows</b></p>	<ul style="list-style-type: none"> <li>Review, enhance and apply the operation of the declaration system at airports and seaports, Ensure the declarations are collected, collated and referred to FASU.</li> <li>Exchange declaration data with regional FIUs.</li> <li>Conduct enhanced surveillance of high risk passengers,</li> <li>Enter into MoUs with neighbouring countries to exchange data on cash declarations to identify possible system failures as well as high risk passengers,</li> <li>Conduct physical inspections (based on intelligence or risk profiling) of luggage, container and postal movements, and</li> <li>Where breaches are found, confiscate undeclared cash and prosecute offenders as a means of deterrent</li> </ul>	<p>4 – 19, 28-30</p>
<p><b>Legislative, Legal, Judicial and Regulatory Weaknesses</b></p>	<ul style="list-style-type: none"> <li>Ensuring that offences under the Fisheries Management Act are predicate offences for ML purposes.</li> <li>Control the creation and operation of NPOs.</li> <li>MoUs are developed and signed by FASU with Customs, IRC, OPP, RPNCG and the IPA, noting that the absence of an MoU does not prevent the sharing of information necessarily</li> <li>MoUs with the FIUs in Australia, Indonesia, Malaysia, Thailand and the Philippines should be developed and signed as soon as possible.</li> <li>The need for training and enhanced skills in key agencies are identified and addressed,</li> <li>Donor assistance for training and technical assistance is sought. This would be assisted by the development of a national AML/CTF training needs assessment and national training program.</li> <li>Judicial training in areas such as proceeds of crime and international cooperation should be provided where necessary. This may be the result of assistance from other jurisdictions.</li> </ul>	<p>1 – 4, 5 – 18, 14 – 19, 20-27</p>
<p><b>Risks relating to lawyers and accountants</b></p>	<ul style="list-style-type: none"> <li>Consider how best to incorporate self-regulating associations for lawyers and accountants into AML/CTF activities (for example through regular meetings with the NCC Secretariat and Co-Chairs).</li> <li>Ensure the Law Society and the Institute of Accountants has a program of supervision and is carrying out AML and CTF supervision of members in conjunction with FASU,</li> <li>Assist the professional associations to conduct training for their members (and use these professionals in other training activities),</li> <li>Ensuring that any suspect behaviour is taken up with the professional registration authorities, and</li> <li>Where evidence emerges of professionals being knowingly involved in ML activity, ensure that prosecution is undertaken.</li> </ul>	<p>7, 9 – 10</p>
<p><b>Real estate related ML risks</b></p>	<ul style="list-style-type: none"> <li>Close scrutiny of transactions by agents, financial institutions and lawyers should be required and be the subject of specific analysis during supervisory visits to these entities.</li> <li>FASU should examine international funds transfers from PNG law firms to foreign real estate agents and law firms and determine the beneficial owner of the transferred funds.</li> <li>Banks should be asked to pay close attention to these kinds of transfers and apply enhanced due diligence.</li> <li>Real estate transactions involving PEPS, their associates and families should receive particular attention.</li> <li>Agents should be required to demonstrate that the purchaser (and any beneficial owner) is properly identified and that the source of funds has been established. Similar obligations exist for banks and others involved in the transaction (such as lawyers and accountants) and compliance should be the subject of compliance audits.</li> <li>FASU and AUSTRAC should work together to scrutinise real estate transactions in Australia where there are funds provided from PNG or which involve PNG owners.</li> </ul>	<p>7, 9 – 10</p>

- New legislation should (at the very least) specify
  - the functions an NPO is permitted to undertake,
  - require the registration of office holders,
  - require annual reporting of activities and financial arrangements,
  - create a public data base of NPOs,
  - prohibit commercial activities being undertaken by NPOs,
  - prescribe when they may be given tax free status, and
  - that where NPOs receive government grants appropriate reporting and audit controls are mandated.
- An urgent attempt be made to cull the current NPO register of inactive NPOs.
- Adequate controls and audit obligations be imposed on all grants to NPOs.
- Banks and other financial institutions dealing with NPOs be required to apply enhanced due diligence procedures to the opening and operating of accounts until the inherent risks in the current system are addressed.

Appendix B: Summary of Action items by agency and FATF Recommendation

Agency	Action Items	Recommendations
<b>DEPARTMENT OF JUSTICE AND ATTORNEY GENERAL and BANK OF PAPUA NEW GUINEA</b>	1-4	<p>Rec 1 – Assessing Risks and Applying a Risk Based Approach</p> <p>Rec 2 – National Cooperation and coordination</p> <p>Rec 15 – New Technologies</p>
<b>BANK OF PAPUA NEW GUINEA (FASU)</b>	5-13	<p>Oversight of:</p> <ul style="list-style-type: none"> <li>- Preventative Measures</li> <li>- Transparency and Beneficial Ownership of Legal Persons and Arrangements</li> </ul> <p>Rec 6 - Targeted financial sanctions related to terrorism &amp; terrorist financing</p> <p>Rec 7 – Targeted financial sanctions related to proliferation</p> <p>Rec 8 - Non-profit organisations</p> <p>Rec 22 – Customer Due Diligence</p> <p>Rec 23 – DNFBS; Other Measures</p> <p>Rec 24 - Transparency and beneficial ownership of legal persons</p> <p>Rec 25 - Transparency and beneficial ownership of legal arrangements</p> <p>Rec 26 - Regulation and supervision of financial institutions</p> <p>Rec 27 - Powers of supervisors</p> <p>Rec 28 - Regulation and supervision of DNFBS</p> <p>Rec 29 - Financial intelligence units</p> <p>Rec 31 - Powers of law enforcement and investigative authorities</p> <p>Rec 33 – Statistics</p> <p>Rec 34 - Guidance and feedback</p> <p>Rec 36 - International instruments</p> <p>Rec 37 - Mutual legal assistance</p> <p>Rec 38 - Mutual legal assistance: freezing and confiscation</p> <p>Rec 39 – Extradition</p> <p>Rec 40 - Other forms of international cooperation</p>
<b>DEPARTMENT OF JUSTICE AND ATTORNEY GENERAL</b>	14-19	<p>Legislative requirements for:</p> <ul style="list-style-type: none"> <li>- Preventative Measures</li> <li>- Transparency and Beneficial Ownership of Legal Persons and Arrangements</li> </ul> <p>Rec 3 - Money laundering offence</p> <p>Rec 4 - Confiscation and provisional measures</p> <p>Rec 5 - Terrorist financing offence</p> <p>Rec 6 - Targeted financial sanctions related to terrorism &amp; terrorist financing</p> <p>Rec 7 – Targeted financial sanctions related to proliferation</p> <p>Rec 37 - Mutual legal assistance</p> <p>Rec 38 - Mutual legal assistance: freezing and confiscation</p>
<b>INVESTMENT PROMOTION AUTHORITY</b>	20-27	<p>Rec 8 - Non-profit organisations</p> <p>Rec 24 - Transparency and beneficial ownership of legal persons</p> <p>Rec 25 - Transparency and beneficial ownership of legal arrangements</p> <p>Rec 26 - Regulation and supervision of financial institutions</p> <p>Rec 28 - Regulation and supervision of DNFBS</p>
<b>CUSTOMS SERVICE</b>	28-30	<p>Rec 2 – National Cooperation and coordination</p> <p>Rec 30 - Responsibilities of law enforcement and investigative authorities</p> <p>Rec 31 - Powers of law enforcement and investigative authorities</p> <p>Rec 32 – Cash couriers</p>

<b>NATIONAL GAMING CONTROL BOARD</b>	31-34	<p>Rec 24 - Transparency and beneficial ownership of legal persons</p> <p>Rec 25 - Transparency and beneficial ownership of legal arrangements</p> <p>Rec 28 - Regulation and supervision of DNFBPs</p>
<b>SECURITIES COMMISSION</b>	35-39	<p>Rec 24 - Transparency and beneficial ownership of legal persons</p> <p>Rec 25 - Transparency and beneficial ownership of legal arrangements</p> <p>Rec 26 - Regulation and supervision of financial institutions</p> <p>Rec 27 - Powers of supervisors</p>
<b>INSURANCE COMMISSION</b>	40-45	<p>Recommendations under: Preventative Measures</p> <p>Rec 12 – Politically Exposed Persons</p> <p>Rec 24 - Transparency and beneficial ownership of legal persons</p> <p>Rec 25 - Transparency and beneficial ownership of legal arrangements</p> <p>Rec 26 - Regulation and supervision of financial institutions</p> <p>Rec 27 - Powers of supervisors</p>
<b>INTERNAL REVENUE COMMISSION</b>	46-48	Multiple
<b>NATIONAL INTELLIGENCE ORGANISATION RPNGC</b>	49 50-52	
<b>OFFICE OF THE PUBLIC PROSECUTOR</b>	53-56	<p>Rec 3 - Money laundering offence</p> <p>Rec 4 - Confiscation and provisional measures</p> <p>Rec 5 - Terrorist financing offence</p> <p>Rec 6 - Targeted financial sanctions related to terrorism &amp; terrorist financing</p> <p>Rec 7 – Targeted financial sanctions related to proliferation</p> <p>Rec 31 - Powers of law enforcement and investigative authorities</p> <p>Rec 32 - Cash couriers</p>
<b>NATIONAL FISHERIES AUTHORITY</b>	57	<p>Rec 3 - Money laundering offence</p> <p>Rec 4 - Confiscation and provisional measures</p> <p>Rec 5 - Terrorist financing offence</p> <p>Rec 6 - Targeted financial sanctions related to terrorism &amp; terrorist financing</p> <p>Rec 7 – Targeted financial sanctions related to proliferation</p> <p>Rec 32 - Cash couriers</p> <p>Rec 37 - Mutual legal assistance</p> <p>Rec 38 - Mutual legal assistance: freezing and confiscation</p>
<b>PNG FOREST AUTHORITY</b>	58	<p>Rec 1 – Assessing Risks and Applying a Risk Based Approach</p> <p>Rec 3 - Money laundering offence</p> <p>Rec 30 - Responsibilities of law enforcement and investigative authorities.</p> <p>Rec 31 - Powers of law enforcement and investigative authorities</p>
<b>SANCTIONS SECRETARIAT</b>	60	<p>Rec 1 – Assessing Risks and Applying a Risk Based Approach</p> <p>Rec 3 - Money laundering offence</p> <p>Rec 30 - Responsibilities of law enforcement and investigative authorities</p> <p>Rec 31 - Powers of law enforcement and investigative authorities</p> <p>Rec 6 - Targeted financial sanctions related to terrorism &amp; terrorist financing</p> <p>Rec 7 – Targeted financial sanctions related to proliferation</p>

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\*Note that only those agencies with a generic email and/or website have been listed







