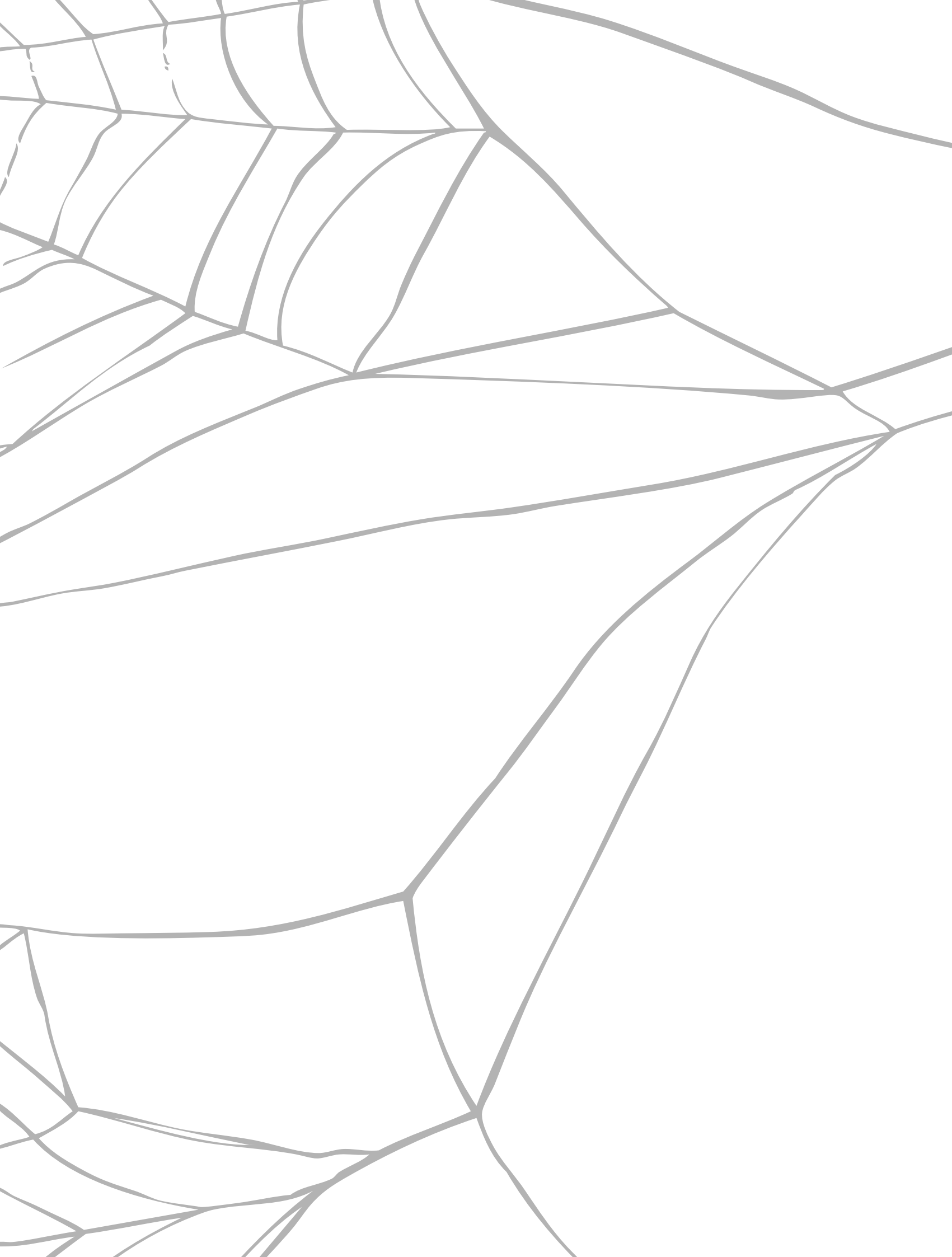




**Relatório Anual**  
**Annual Report**  
**2016**

Unidade de  
Informação  
Financeira







**Relatóriu Anual**  
**Annual Report**  
**2016**

# Vizaun Vision

“Kontribui ba sistema finanseiru no laós-  
finanseiru ida ne’ebé dinámiku, sólidu no livre  
hosi brankeamentu kapital no finansiamentu  
terrorismu”

“Contribute to a dynamic and solid financial and  
non-financial system which is free from money  
laundering and financing of terrorism”





# Misaun Mission

“UIF nu’udar entidade independenti no kredível, ativu hala’o funsaun prinsipal sira hodi fornese informasaun ba parseiru; promove programa habelar informasaun relevante ba públiku liu-liu ba entidade sujeita sirahodi garante kumprimentu ba obrigasaun legal; no promove koperasaun ho Autoridade nasional no internasionál iha asaun prevensaun no kombate brankeamentu kapital, finansiamentu terorismu no infrasaun subjasenti sira”

To be an independent and credible center, supplying high quality intelligence reports to UIF partners; actively promote public awareness raising program concerning related topics, prioritizing reporting entities to promote their compliance with applicable legal obligations; and promote effective domestic and international cooperation in the fight against money laundering, terrorist financing and associated predicate offenses.

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# Akrónimu no Abreviasaun Acronyms and Abbreviations

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<b>ABK/KFT</b>	Anti-Brankeamentu Kapital no Kombate Finansiamentu Terorizmu (uza ba abreviasaun legislasaun nasional konabá “Rejime Legal Prevensaun no Kombate Brakeamentu Kapital no Finansiamentu Terorizmu”)
<b>AML/CFT</b>	Anti and Money Laundering and Combating Financing of Terrorism (used to abbreviate the national legislation on the “Legal Regime of Prevention and Combating Money Laundering and Financing of Terrorism”)
<b>AK LEA</b>	Autoridade Kompetente Law Enforcement Authorities
<b>ATO CEB</b>	Ajénsia Troka Osan Currency Exchange Bureau
<b>ANR NRA</b>	Avaliasaun Nasional ba Risku National Risk Assessment
<b>BCTL</b>	Banco Central de Timor-Leste
<b>BK ML</b>	Brankeamentu Kapital Money Laundering
<b>BNCTL</b>	Banco Nacional de Comércio Timor-Leste
<b>BDA ADB</b>	Banku Dezenvolvimentu Aziatiku
<b>CNCBC</b>	Comissão Nacional para a Implementação de Medidas Destinadas ao Combate ao Branqueamento de Capitais e ao Financiamento do Terrorismo (Portuguese abbreviation for National Commission of AML/CFT)
<b>FT</b>	Finansiamentu Terorizmu Financing of Terrorism
<b>GAFI FATF</b>	Grupo de Ação Financeira Financial Action Task Force
<b>GAP APG</b>	Grupo Ásia Pásifiku Anti-Brankeamentu Kapital Asia Pacific Group on Money Laundering
<b>GBM WBG</b>	Grupu Banku Mundial World Bank Group
<b>RAM MER</b>	Relatóriu Avaliasaun Mútua Mutual Evaluation Report



<b>OTO</b> <b>MTO</b>	Operador Transfere Osan Money Transfer Operators
<b>OIRD</b> <b>ODTI</b>	Instituisaun Seluk Simu Depóztu Other Depository Taking Institutions
<b>PJR</b> <b>PPO</b>	Prokurador Jeral Republika Public Prosecutor Office
<b>PCIC</b>	Polícia Científica e de Investigação Criminal (Scientific Police and Criminal Investigation)
<b>PPATK</b>	<i>Pusat Pelaporan dan Analisis Transaksi Keuangan</i> (Abbreviation for Indonesian FIU)
<b>PEN</b> <b>NSP</b>	Planu Estratéjiku Nasional National Strategic Plan
<b>RDTL</b>	República Democrática de Timor-Leste
<b>RTS</b> <b>STR</b>	Relatório Tranzasau Suspeita Suspicious Transaction Report
<b>RTN</b> <b>CTR</b>	Relatório Tranzasau Numeráriu Cash Transaction Report
<b>UIF</b> <b>FIU</b>	Unidade de Informação Financeira - The official name for the “Financial Intelligence Unit” of Timor-Leste
<b>TPN</b> <b>BNI</b>	Título Portadór Negosiável Bearer Negotiable Instrument
<b>DTM</b> <b>DCT</b>	Deklarasaun Transporte Moeda Declaration of Cash Transportation
<b>PACED</b>	Projeto de Apoio à Consolidação do Estado de Direito nos PALOP e em Timor-Leste Project to Support the Consolidation of the Rule of Law in PALOP and Timor-Leste
<b>PALOP</b>	Países Africanos de Língua Oficial Portuguesa Portuguese Speaking African Countries
<b>PPE</b> <b>PEP</b>	Pessoas Politicamente Expostas Political Exposed Persons



# Lia-Menon Diretora Ezekutiva Executive Director's Message

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Lia-Menon Diretora Ezekutiva  
Executive Director's Message

Ho ksolok, Unidade de Informação Financeira (UIF) apresenta Relatóriou daruak ba tinan remata iha loron 31 Dezembru 2016. Haktuir Dekretu-Lei nú 16/2014 loron 18 Juñu, artigu 9, UIF iha obrigasaun atu prepara relatóriou kada tinan nian hodi deskreve atividade hirak ne'ebe dezempeña ona durante tinan ida nia laran no submete ba Governador Banco Central Timor-Leste. UIF iha mós obrigasaun legal atu publika relatóriou refere no haruka kópia ba Autoridade Nasional sira ho kompetensia ba Anti-Brankeamentu Kapital no Kombate Finansiamentu Terorismu (ABK/KFT).

Relatóriou ne'e subliña atividade prinsipal sira ne'ebe UIF dezempeña durante tinan ida no kontein mós planu assaun balu ba tinan tur mai. UIF halo ona progressu iha nia knar balu hahú kedas loron UIF hamrik iha Setembru 2014, hodi kontribui duni ba esforssu nasional atu kombate brankeamentu kapital (BK) no finansiamentu terorismu (FT).

Tinan 2016, embora hassoru dezafiu balu, UIF kontinua dissemina rezultadu analize tranzasaun suspeita ba Ministériu Públiku/Prokuradoria Geral Repúblika; responde mós ba pedidu informasaun ho volume aás hosi Ministériu Públiku rasik no Autoridade Kompetente seluk, inklui fahe informasaun ba malu; dezenvolve ona Padraun Prosedimentus Operasional ba funsaun principal sira; rekruta funsionariu foun hodi assumi knar no responsabilidade nu'udar Técniku UIF nian hahú kedas fulan Julho; hala'o formasaun hodi dezenvolve sira nia kapasidade; hala'o formasaun ba entidade sujeita sira ne'ebe iha frakeza iha sira nia sistema ABK/KFT hodi assegura sira nia koñesimentu diak ba obrigasaun legal; no mós organisa asaun formasaun konjunta ne'ebe involve funsionáriu UIF, Responsável Compliance hosi banku komersial sira, no autoridade competente sira. Esforssu ida ne'e kontinua hala'o nafatin tamba UIF rekoñese valor hosi asaun formasaun sira nu'udar meu importante ida hodi bele kontribui ba luta kontra BK/FT iha Timor-Leste.

It is my pleasure to release the second Annual Report of Unidade de Informação Financeira (UIF or Financial Intelligence Unit) of Timor-Leste for the year ended 31 December 2016. The Decree Law no.16/2014 of 18 June, article 9, requires UIF to prepare an annual report containing activities performed during the year and to submit to Governor of Banco Central de Timor-Leste. The Law further requires UIF to publish the annual report as well as to transmit copies to National Authorities with competences on Anti Money Laundering and Combating Financing of Terrorism (AML/CFT).

The report highlights activities carried out during the year and contains plans for the forthcoming year. UIF has made progress since its establishment in September 2014 and proved itself as an entity that is contributing to the national effort to combat money laundering (ML) and terrorist financing (TF).

During 2016, along with other key challenges, UIF successfully disseminated suspicious transactions to Public Ministry/Public Prosecutor's Office also responded to a significant volume of cases with the Public Prosecutor's Office and other Law Enforcement Authorities including regular sharing of information; developed Standard Operating Procedures for all core functions; new staff recruited and assumed functions and responsibilities since July of the same year; provided capacity building training to UIF staff; provided training workshops to reporting entities to address weaknesses in the AML/CFT system; as well as organised joint training workshops that involved UIF staff, the bank's Compliance Officers and law enforcement authorities. These efforts are made as given that UIF always valued training as an essential tool to fight against money laundering and terrorist financing (ML/TF) crimes in Timor-Leste.

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Akr | Acr

Lia | Mess

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Kap 3 | Cha 3

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Passu signifikante ida mak UIF nu'udar koordinador ba implementasaun programa nasional prinsipal rua hosi mandatu Komissaun Nasional ba ABK/KFT ou CNCBC nian, UIF konklui ona Avaliasaun Nasional ba Risku BK/FT no Planu Estratejiku Nasional ba ABK/KFT ba períudu 2016 – 2020. VI Governu Konstitusional, RDTL formalmente adopta ona relatoriu refere iha loron 14 Juñu 2016. UIF haré katak kompleta deit avaliasaun nasional ba risku no dezenvolve planu estratejiku komprensivu ne'e la suficienti. Parte krítiku liu mak oin-sá tau iha prátika planu hirak ne'e hodi responde ba risku no vulnerabilidade hirak ne'ebe identifika ona durante prosessu avaliasaun. Nune'e mós implementasaun asaun sira bazeada iha risku sei assegura sistema ABK/KFT efektivu liu tan hodi alkansa rezultadu ne'ebe espera fó benefísiu ba nasaun Timor-Leste. Nune'e, hahú 2016, UIF implementa dadauk ona planu asaun sira ne'ebe kabe ba responsabilidade UIF nian no sei kontinua iha tinan tuir mai.

Rezultadu hosi knar hotu ne'ebe dezempenha iha tinan 2016 la possível atu alkansa karik laiha apoiu hosi Banco Central Timor-Leste (BCTL), liu-liu hosi Senhor Governador/Prezidenti Konseju Administrasaun, membrus Konseju Jestaun, no funsionáriu tékniku hosi área relevante sira.

Hanesan membru efektivu ida hosi CNCBC, UIF sei serbissu hamutuk nafatin ho BCTL; Ministéiru Públiku/Prokuradoria Geral Repúblika no autoridade investigador sira seluk hodi kontribui ba esforssu nasional atu salva-guarda sistema finanseiru no ekonomia Timor-Leste em jeral.

Molok remata, ha'u hodi UIF nia naran hakarak hato'o agradesimentu sasukat laiha ba Excelentíssimos Senhores membrus CNCBC, Responsável Compliance sira ba kolaborasaun no koperasaun diak; no mós ba Parseirus Internasional sira ne'ebe kontribui ba dezenvolvimentu institucional UIF nian.

Ikus liu, ba progressu hirak ne'e hotu, ha'u hato'o mós agradesimentu sasukat laiha, ba funsionáriu UIF sira nia serbissu maka'as, dedikasaun no komitmentu bot hodi bele atinji objetivu UIF nian.

This is also a significant step to know that, UIF which has been entrusted the role of coordinator, has concluded the implementation of two main programs under the National Commission on AML/CFT or the CNCBC's mandate such as (i) National Risk Assessment on ML/TF; (ii) National Strategic Plan for the period 2016 – 2020; and where have been formally endorsed by the VI Constitutional Government of RDTL on 14 June 2016. UIF recognises that completing the national risk assessment and developing comprehensive action plan is not sufficient by itself. The most critical part is putting the plans into effect in a manner that mitigates the risks and vulnerabilities identified in the assessment. Moreover, the implementation of risk based actions will ensure that the AML/CFT system is effective and is being applied to achieve results that benefit Timor-Leste. Therefore, UIF has gradually implemented the defined action plans under UIF responsibility and will continue in the forthcoming year.

All the achievements in 2016 would not be possible without the support from Banco Central de Timor-Leste, in particular the Governor/President of the Board, the Management and technical staff from relevant areas.

As an effective member of the CNCBC, UIF looks forward to working closely with the BCTL, Public Prosecutor Office and relevant Investigators to better contribute to a safer Timor-Leste's financial system and economy.

To close, I would like on behalf of the UIF to express my sincere appreciation to Excellences members of the CNCBC; the Bank's Compliance Officers for the usual collaboration and cooperation; and International Partners who have been actively contributed to UIF's institutional development.

Finally, for the progress made this year, I particularly thank all UIF staff for their diligent, hard work and commitment to the UIF's goals.



Maria José J. Sarmiento  
Diretora Ezekutiva Executive Director  
Dili, 24-4-2017

# **Kapítulu** **1** **Chapter**

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## **Lian Maklokek no** **Enkuadramentu Legál** **Introduction and Legal** **Framework**

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Kap 4 | Cha 4

Kap 5 | Cha 5

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## 1.1

# Lian Maklokek Introduction

Unidade de Informação Financeira (UIF) kria hanesan Unidade Intelijénsia Financeira Timor-Leste nian iha Banco Central de Timor-Leste (BCTL) laran tuir Lei nú. 17/2011 28 Dezembru, alteradu ho Lei nu. 5/2013/III 14 Agostu kona-ba Rejime Legál ba Prevençan no Kombate Brankeamentu Kapitál no Finansiamentu Terorizmu (Lei ABK/KFT). UIF nia organizasaun, administrasaun no kbiit hotu defini iha Dekretu Lei nu. 16/2014, 18 Juñu. Hanesan ajénsia sentral ida iha rejime ABK/KFT, UIF independente iha nia jestaun operacional ho objetivu atu aplika nia poder, devér hotu, no nia funsaun, inklui iha autonomia atu foti desizaun relaciona ho knar simu, analiza informasaun ne'ebé iha relasaun ho brankeamentu kapitál (BK) no finansiamentu terorizmu (FT) no dissemina ba autoridade competente. Seksaun II artigu 9 hosi Dekretu Lei refere, tau obrigasaun ba UIF atu prodúz relatório anuál hodi relata atividades operasionál hotu ne'ebe dezempenha ona iha tinan ida nia laran no apresenta ba Governadór Banco Central Timor-Leste hanesan informasaun no konsiderasaun.

Relatório ida ne'e hanesan relatório anuál daruak ne'ebé UIF Timor-Leste lansa hodi describe dezempeñu serbisu iha tinan 2016 tuir nia kompeténsia hotu. Kompara ho Relatório anuál dahuluk ne'ebe elabora liu eventus jerál sira, relatório 2016 sei elabora liu konabá realizasaun serbisu iha tinan 2016, inklui progresu ne'ebé atinji ona hodi responde planu estratéjiku nasional (PEN 2016-2020). Ho nune'e relatório ida ne'e importante tebes atu apresenta informasaun klaru ba lé-nain sira atu koñese liu tan UIF nia funsaun no responsabilidade sira nune'e promove UIF ne'ebé foin haknar-an iha tinan rua laran.

The Unidade de Informação Financeira of Timor-Leste was created as an administrative Financial Intelligence Unit (FIU) within the Banco Central of Timor-Leste in accordance with the Law no. 17/2011 of 28 December, amended by Law no. 5/2013/III of 14 August for Legal Regime to Prevent and Combat Money Laundering and Financing of Terrorism (AML/CFT Law). The organisation, governance and the powers of UIF are defined in the Decree Law no. 16/2014 of 18 June. The UIF which is a national central agency in the AML/CFT regime is independent in its operations for the purpose of enforcing its powers, the core duties and functions, including full autonomy in decisions to receive, analyse information related to money laundering (ML) and terrorist financing (TF) and to disseminate to competent authority. Under Section II article 9 of the same Decree Law, UIF is required to produce annual report covers all operational activities performed during the year and to submit to Governor of Banco Central Timor-Leste (BCTL) for information and consideration.

This is the second annual report released by UIF Timor-Leste that describes the works performed in 2016 from various fields of its competences. Following the first annual report which elaborated more in general events, the 2016 report elaborates more on achievements that has been done in the year including particular progress that UIF has made in implementing the national strategic plans (NSP 2016 - 2020). It is very important that the presentation in this report should be much more informative for the readers to know and understand better UIF's main roles and functions in order to promote UIF which just two years in operation.



## 1.2

# Enkuadramentu Legál Legal Framework

Hafoin independénsia iha 2002, sistema finansiamentu iha Timor-Leste iha mundansa maka'as tuir nesedidade no hakarak Timor-oan nian, inklui tuir globalizasaun. Ho nune'e mak governu Timor-Leste iha komitmentu boot dezenvolve sistema finanseiru ho fiar katak sistema finanseiru iha Timor-Leste tenke transparente, inkluzivu no funsiona ho integridade hodi asegura dezenvolvimentu ekonomia no promove boa governasaun. Tan ne'e mak Governu no Parlamentu Nasionál Timor-Leste aprova Lei nú. 17/2011 ABK/KFT. Wainhira iha mundansa ba padraun internasionál sira, Governu RDTL hatudu nafatin komitmentu hodi aprova Lei nú. 05/2013/III ABK/KFT loron 14 Agostu, hodi halo alterasaun dahuluk ba Lei ABK/KFT no alterasaun datoluk ba Dekretu Lei nú. 19/2009 konabá Kódigu Penál nia artigu 133 "finansiamentu terorizmu" no artigu 313 "brankeamentu kapitál", nune'e mós hatu'un pena prizaun husi tinan hat ba tinan rua relasiona ho krimi sira ne'ebe fo orijin ba brankeamentu kapitál. Alterasaun hirak ne'e halo hodi responde defisiénsia balu ne'ebé identifika ona iha Relatóriu Avaliasaun Mútua tinan 2012 nian.

Nu'udar mekanizmu koperasaun no kordenasaun iha nível nasionál, Konsellu Ministru VI Governu Konstitusionál RDTL, aprova Rezolusaun nú. 10/2014 loron 9 Abril ne'ebe forma Komisaun Nasionál ba Implementasaun Medidas Kombate Brankeamentu Kapitál no Finansiamentu Terorizmu, habadak ho "CNCBC". Komissaun ne'e ko-prezidi husi Ministru Negósiu Estranjeiru no Koperasaun, no Ministru Justisa ho mandatu atu kordena implementasaun programa ABK/KFT, nune'e mós atu garante Timor-Leste kumpri padraun internasionál sira. Rezolusaun ida ne'e hetan ona alterasaun ba dahuluk liu hosi Rezolusaun nú. 18/2016 loron 29 Juñu, ho objetivu atu inklui tan UIF ho instituisaun seluk ne'ebe iha kompetensia hanesan tuir Lei ABK/KFT, no mós halo ajustamentu ba título pozisaun sira tuir re-estruturasaun ba instituisaun Governu.

Since independence in 2002, financial system of Timor-Leste has changing subsequently follow by more demands and needs from Timorese people and globalization. In line with that, Government of Timor-Leste committed to develop financial system with believed, Timor-Leste financial systems must be transparent, inclusive, and function with integrity to ensure economic development and promote good governance. In accordance with that Government of Timor-Leste and National Parliament approved Law no. 17/2011 AML/CFT. Following changes of international regulations, the government remained committed to amended AML/CFT Law no. 05/2013/III of 14 August, concerning the first amendment to AML/CFT Law and the third amendment to Penal Code specifically article 133 concerning financing of terrorism and article 313 on money laundering as well as lowering the threshold for a predicate crime to be considered money laundering from four years to two years imprisonment. The amendment was subsequently made to address deficiencies identified during the mutual evaluation 2012.

As a cooperation and coordination mechanism at the national level, the Council of Ministers of the VI Constitutional Government of RDTL, through its Resolution no.10/2014 of April 9th, constituted a National Commission for the implementation of AML/CFT measures named in Portuguese as "CNCBC" (Comissão Nacional para a Implementação de Medidas Destinadas ao Combate ao Branqueamento de Capitais e ao Financiamento do Terrorismo). The CNCBC which is co-chaired by the Minister of Foreign Affairs and Cooperation, and Minister of Justice is mandated to oversee a series of AML/CFT programs as well as to ensure overall compliance with international standards. This Resolution has been further amended through resolution no. 18/2016 of 29 June to incorporate UIF and other state institutions with similar competences also adjusted the position titles with the recent restructuring of government institutions.



# Kapítulu Chapter 2

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## Antesedentis Organizasaun no Estrutura Background and Organization Structure

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Kap 2 | Cha 2

Kap 3 | Cha 3

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## 2.1

# Antesedentis Organizasaun Organisation Background

UIF ofisiálmente hahú haknar-an iha loron 26 Setembru 2014 no bazeia ba Lei ABK/KFT, UIF sei serbí nu'udar sentru nasional ida ho responsabilidade prinsipál atu simu no analiza relatóriu tranzasaun suspeita no informasaun seluk relasiona ho brankeamentu kapitál, krimi subjasenti sira, no finansiamentu terorizmu, no tenki dissemina rezultadu análise ba Ministériu Públiku nu'udar estabesele iha artigu 26 hosi Lei refere.

Instituisaun UIF lidera hosi Diretór Ezekutivu ida, ne'ebe nomeia husi Governador BCTL ba durasaun tinan 4, no responsável ba jestaun operacional lor-loron nian hodi kumpri devér hotu ne'ebe hatu'ur iha artigu 2 no 6 hosi Dekretu Lei. Devér hirak ne'e mak hanesan tuir mai:

- a) Atu simu relatóriu tranzasaun suspeita konabá krime BK/FT no informasaun relevante seluk husi entidade sujeita sira;
- b) Atu halo anlise adekuada ba informasaun ne'ebe simu ona no rekolha informasaun adisionál;
- c) Atu dissemina rezultadu análise, kuandu tranzasaun finansiamentu ida ne'ebe iha indikasaun suspeita forte relasiona ho atividade BK/FT;
- d) Atu simu relatóriu tranzasaun numeráriu no formuláriu deklarasaun lori osan kas tama sai fronteira husi autoridade Alfandegária;
- e) Atu kolabora ho autoridade judisiál no autoridade competente sira seluk ne'ebe iha kompeténsia ABK/KFT bainhira simu pedidu informasaun inklui pedidu konabá apoiu tékniku perisial;

The UIF was officially commenced its operations on 26 September 2014 and in accordance with AML/CFT Law, UIF should serve as the national center responsible for the receipt and analysis of the suspicious transaction reports and other information relevant to money laundering, associated predicate offences and terrorist financing, and shall disseminated the result of analysis to Public Prosecutor Office as required under article 26 of the same Law.

The UIF is headed by an Executive Director appointed by the Governor of BCTL for a term of 4 years who takes on the leadership, coordination and management of day-to-day operation responsibilities so as to fulfil the duties stipulated in the article 2 and 6 of the Decree Law no. 16/2014 are summarised below:

- a) To receive suspicious transaction report related to laundering of the proceeds of crime or terrorist financing and other relevant information from the reporting entities;
- b) To undertake proper analysis of information received and to request additional information;
- c) To disseminate the result of analysis, whenever strong ground of suspicion exists that certain financial transactions are indicative of money laundering activity of terrorist financing;
- d) To receive cash transaction report as well as declaration form of the cross border cash transportation from Custom Authority;
- e) To collaborate with judicial authorities and other law enforcement authorities with competences in AML/CFT matters upon receiving any request for information including request for technical support;

f) Atu kordena no propoin mekanismu akordu koperasaun ho autoridade relevante iha nível nasonál, nune'e mós ho UIF internasionál sira konabá troka informasaun hodi kombate BK/FT iha forma efetivu no efisiente;

g) Atu koopera ho autoridade relevante hodi promove sensibilzasaun públiku nune'e permiti ema hotu iha koñesimentu baziku konabá ABK/KFT;

h) Atu aplika sansaun administrativa bainhira iha infrausaun ruma komete husi entidade sujeita hirak ne'ebé seidak iha autoridade regulasaun no supervizaun;

i) Atu mantein sistema baze dadus apropriadu hodi armazena informasaun hirak ne'ebe simu, analiza no dissemina ba autoridade kompetente.

f) To coordinate and propose cooperation agreement mechanism with relevant authorities at national level as well as international UIFs, for information exchange, in order to combat ML/FT in an effective and efficient manner;

g) To cooperate with relevant authorities to promote public awareness raising to guarantee people having basic knowledge on AML/CFT;

h) To apply administrative sanction if infractions are committed by those reporting entities that are not subject to any supervision of regulatory and supervisory authority;

i) To maintain an appropriate database system for storing information received, analysis and its dissemination to competent authority.

## 2.2

# Estrutura Organizasaun Organisation Structure

Durante tinan ne'e, UIF introdúz alterasaun ki'ik balu ba estrutura organizasaun atu bele refleto di'ak liu ba funsaun prinsipál, no mós funsaun seluk ne'ebé krusiál ba Unidade ida ne'e hodi atinji objetivu sira. Atu serbisu ho efisiénsia, knar UIF nian kategoriza ba área tolu:

- **Administrasaun no Knar Tékniku ba Relatóriu Tranzasau Suspeita**

Administrasaun relatóriu tranzasaun suspeita (RTS) no Tékniku, hanesan área ne'ebe UIF administra RTS no mós simu informasaun relevante konabá BK/FT ne'ebe simu husi entidade sujeita sira, no hala'o funsaun prinsipál sira hodi analiza; rekolha informasaun adisionál nune'e mós hatama dadus ba sistema baze-dadus. Relatóriu hotu-hotu ne'ebe tama sei halo verifikasaun atu asegura

During the year, UIF has introduced minor changes to its organization structure to better reflecting the real core function needs as well as other non-core functions which is crucial to this special Unit in achieving its objectives. For efficiency purposes, the duties of UIF are categorized into 3 main areas:

- **Suspicious Transaction Report's Administration and Technical**

The STR's Administration and Technical is the area where the UIF core functions are performed, responsible for administration of STRs and other relevant ML/FT information received from different reporting entities; analysing and collection of additional information; as well as inputting data collected into the database. All incoming reports



dados ka informasaun nesessáriu submete ona ba UIF. Iha tempu hanesan, sei halo análise, inklui verifika se koresponde dados ezistenti iha sistema baze-dados no informasaun intelijénsia ne'ebe fahe ba malu ho autoridade competente sira, inklui informasaun ho fonte públiku no mós hosi UIF internasionál ruma. Área ida ne'e mós responsabiliza ba produsaun estatística no tipolojia atu tau hamutuk dados estatística tuir RTS sira ne'ebé simu, no mós atu fornese informasaun hanesan orientasaun no tipolojia ba autoridade supervizaun no entidade sujeita sira. Tipu relatóriu analiza tipolojia nian sei prepara ba referénsia internál, no relatóriu hirak ne'e bele sai mós mata-dalan ida ne'ebe nesessáriu ba revizaun polítika autoridade supervizaun nian.

#### • Formasaun no Habelar Informasaun ba Públiku

Artigu 2 hosi Dekretu Lei, fo mós kbi'it ba UIF atu kordena ho autoridade competente sira hodi promove programa sensibilizasaun públiku konabá ABK/KFT. Programa ne'e importante tebes hanesan asaun stratéjia UIF nian ida. Haré ba razaun ne'e mak, área treinamentu no habelar informasaun ba públiku sei responsável ba promove programa formasaun ka workshop ruma; nune'e mós halo sensibilizasaun liu hosi brosurá, jornál, no mós anúnsiu ruma liu husi média ne'ebé konsidera nesessáriu hodi habelar informasaun ABK/KFT nian.

#### • Koperasaun

Artigu 11 husi Dekretu Lei refere, fó liu tan kbi'it ba UIF atu propoin akordu tantu ho UIF internasionál no mós autoridade judisiária sira iha nível nasional inklui autoridade seluk ho kompeténsia ba ABK/KFT. Koperasaun ho insitituisaun sira seluk iha importánsia ne'ebé signifikante tebes ba UIF hodi bele implementa knar tuir mandatu legál. Tan ne'e, nesessáriu atu mantein área espesífiku ba koperasaun ho responsabilidade atu promove akordu koperasaun no troka informasaun entre insitituisaun tantu iha nível nasional no internasionál, no atu assegura prosessu implementasaun ba akordu koperasaun sira be assina ona.

will be verified to ensure all data are properly filled in. At the same time analysis will be carried out, including data matching against existing records and intelligence sharing information with national law enforcement authorities, open source information and foreign counterparts. The same area is also responsible for production of statistics and typologies to extract statistical data periodically from STRs received, as well as to provide information such as trends and typologies to the supervisory authorities and reporting entities. Analysis reports on typologies and transaction types will be prepared for internal reference, and these reports may also serve as insights for supervisory authorities' policy review.

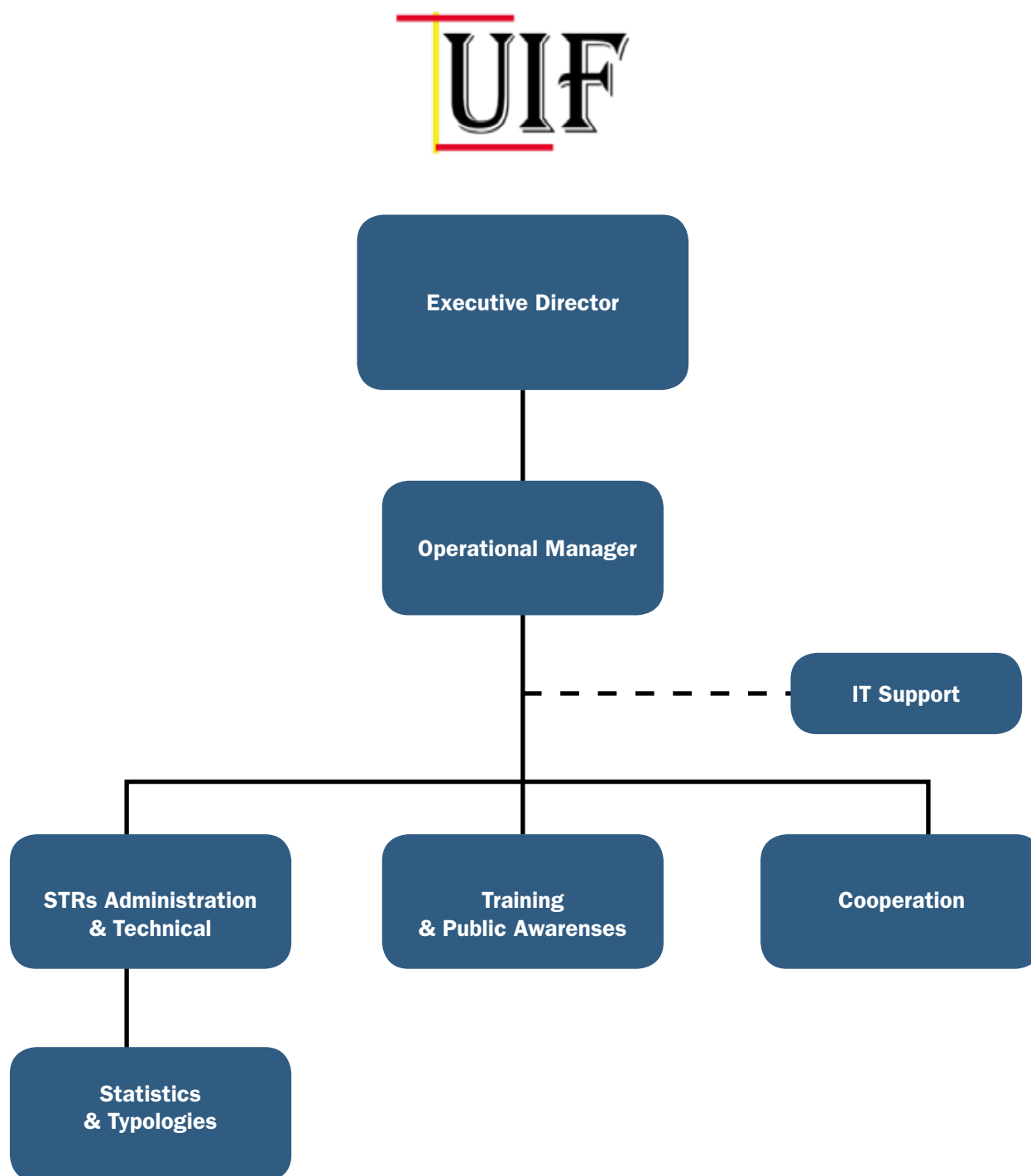
#### • Training and Public Awareness

Under the same Decree Law, article 2, UIF is also required to coordinate with other competent authorities to promote AML/CFT awareness raising programs. This program has been an important strategic action plan of UIF since its establishment. For this reason, the training and public awareness area is set up with responsibility to arrange relevant training and workshop programs including preparing promotional campaigns by means of brochures, newspaper articles and advertisements in mass media which are necessary to raise public awareness concerning the importance of AML/CFT.

#### • Cooperation

Article 11 of the same Decree Law, requires UIF to enter into agreement with International FIUs as well as to collaborate with domestic judiciary authorities and other entities vested with AML/CFT competences. Cooperation with other institutions has significant importance to this agency in implementing its legal mandate. Therefore, it is necessary to maintain this specific area for cooperation with responsibility to deal with agreements for cooperation and information exchange between institutions both at domestic and international level also to secure its implementation process.

Diagrama 1: Estrutura organizasaun UIF Diagram 1: The organization structure of UIF



## 2.3

# Rekursu Umanu Human Resources

Dezempañu ba knar tomak UIF nian assegura hosi ofisial nain tolu ho kategoria Tékniku no mós Tékniku Informátika (IT) na'in ida ne'ebe Señor Governadór BCTL indika ba UIF iha lora 22 Agostu 2016, hodi fó apoiu tékniku ba UIF liu-liu durante prosesu dezenvolvimentu sistema baze-dadus.

UIF nia knar lida barak liu ho informasaun pessoal sira ne'ebe Lei proteje. Tanba ne'e, haktuir iha artigu 20 hosi Lei ABK/KFT, funsionáriu UIF hotu sujeitu ba devér espesiál konfidensialidade konabá informasaun hirak ne'ebé hetan ona iha âmbito serbissu nian, no sei uza tuir lei defini. Ba se mak kebra dispozisaun legal ne'ee sei submete ba asaun disiplinár no possível assumi responsabilidade kriminal tuir lei haruka.

The duties of UIF are performed with the full support of three staff of Officer Levels and one IT staff appointed by the Governor of BCTL on 22 August 2016 to provide technical support to UIF primarily during the process of a proper data base system development.

The UIF is dealing mostly with information that is legally protected. Therefore, under article 20 of AML/CFT Law no. 17/2011, all employees of UIF are subject to a special duty of confidentiality regarding the information obtained within the scope of or arising from the respective functions and such information shall be used solely for the purposes defined in the law. Infringement of the provisions will result in disciplinary action and possible criminal liability under the terms of the Law.

Pozisaun Positions	Tinan Year	
	2016	2015
Diretor-Ezekutivu Executive Director	1	1
Jestor Operasionál Operational Manager	-	-
Administrasaun RTS & Tékniku (Estatística & Tipolojia) STRs Administration & Technical (Statistics & Typologies)	2	1
Formasaun & Habelar Informasaun ba Públiku Training & Public Awareness	-	-
Koperasaun Cooperation	1	-
Total Funsionáriu UIF Total UIF Employees	4	2
Apoiú Tékniku Informátiku IT Support	1	-

## 2.4

# Orsamentu Budget

Haktuir ba Seksaun II artigu 8 hosi Dekretu Lei, kustu financeiru hotu ne'ebe neessáriu hodi dezempeña atividade operasionál UIF nian hotu, tenki inklui iha orsamentu anual Banco Central Timor-Leste nian. Dever BCTL nian ne'e kobre mós fornimentu serbissu-fatin no ekipamentu serbissu nian sira.

Nu'udar justifikasaun ba uzu finansiametu ida ne'e, UIF iha obrigasaun, tuir artigu 9 hosi Dekretu Lei refere, atu prepara relatóriu anuál ne'ebé deskreve atividade UIF nian iha tinan ida laran no submete ba Governador BCTL.

As provided in the Section II article 8 of the Decree Law 16/2014, all financial cost required for performing UIF operational activities shall be incorporated in the annual budget of BCTL. This includes office space and office equipment.

In turn, UIF has the obligation under article 9 of the same Decree Law to produce an annual report containing activities performed during the year and submit to Governor of BCTL for information and consideration.



## 2.5

# Tipu Informasaun no Prosesu Knar Prinsipál Type of Information and Core Business Process

Iha informasaun oi-oin nu'udar fonte báziku no fundamentál ba UIF hodi ezekuta nia manadatu legál ne'ebe kategoriza hanesan: informasaun finanseira, adminstrativu no informasaun husi autoridade kompetente sira hanesan tuir mai ne'e:

### Relatóriu Tranzasau Suspeita (RTS)

Tuir artigu 23 Lei ABK/KFT, entidade sujeita hotu-hotu hanesan difini ona iha artigu 3 hosi Lei refere, iha obrigasaun hato'o relatóriu imediatamente ba UIF bainhira iha razaun suspeita forte katak tranzasaun finanseiru ruma involve atividade brakeamentu kapitál, finansiametu terorizmu ka atividade ne'ebé nia orijin mai husi krime ruma. Negosiante osan mean no metal sira mós iha obrigasaun atu haruka relatóriu tranzasaun suspeita ho montante US\$10,000.00 ka liu. Informasaun RTS hotu sei armazena iha baze-dadus UIF nian no sei submete ba prosesu análise operasionál. Wainhira rezultadu análise iha indikasaun kriminál ruma sei haruka relatóriu ba Prokuradoria Jerál Repúblika hodi bele foti prosesu apropiadu tuir lei haruka.

### Relatóriu Tranzasau Númerariu (RTN)

Operadór Transfere Osan sira iha obrigasaun hanesan atu hato'o RTS no RTN ba UIF. Limite mínimu RTN mak US\$2,500.00 ka liu, tuir tranzasaun ne'ebé kliente movimentá. Informasaun RTN hotu sei armazena iha baze-dadus UIF no sei utiliza iha prosessu análise RTS.

### Deklarasaun Transporte Moeda no Títulu ba Portadór Negosiável

Deklasau transporte moeda (DTM) no Títulu ba Portadór Negosiável (TPN) klasifika hanesan informasaun autoridade kompetente nian ne'ebé nia orijen mai husi Autoridade

The primary source of information which is a fundamental basis for UIF to execute its legal mandate is financial information; administrative; and law enforcement information, which consisted the following:

### Suspicious Transaction Reports (STRs)

Under article 23 of AML/CFT Law, all reporting entities as defined in the article 3 of the same Law, are obliged to immediately file a report to the UIF if having reasonable grounds to suspect that a financial transaction involves money laundering, terrorist financing or any proceeds from unlawful activity. Dealers in precious stones and metals have similar obligation to report any suspicious transaction amounting US\$ 10,000.00 or more. The STR information is stored in the UIF database and shall proceed with operational analysis and whenever the result of analysis as indication of criminal activity, it shall report to the Public Prosecution Office, so that the proper proceedings may be lodged.

### Cash Transaction Reports (CTRs)

Money Transfer Operators have similar obligation to report both STRs and CTRs to UIF. The minimum limit for CTR is US\$2,500.00 or more for each transaction that a client is moving. The CTR information is stored into UIF data base and is used to support STR analysis.

### Declaration of Cash Transportation and BNI

Declaration on cash transportation and bearer negotiable instrument (BNI) is classified as law enforcement information originating from Custom Authority which is mandatory under article 7 of the AML/CFT Law. The Law requires any person entering or leaving territory of Timor-



Alfandegária tuir artigu 7 Lei ABK/KFT. Lei ezije ema hotu ne'ebe tama ka sai teritóriu Timor-Leste no lori osan númerariu ka títulu portadór negociavel ho montante US\$10,000.00 ka liu, tenke deklara ba Autoridade Alfandegária, hafoin kopia hosi deklarasaun refere tenke haruka imediatamente ba UIF.

**Asesu ba Informasaun**

Halibur informasaun hosi fonte barak hanesan elementu esensiál ba prosesu hotu tanba konsidera krusial atu fó mais-valia ida ba análice RTS hodi bele komunika kazu suspeita ne'e ba PJR. Tan ne'e, Lei ABK/KFT artigu 21, fo kbi'it bot ba UIF atu husu informasaun adisionál ba entidades sujeita sira, autoridade polísial; judisiál; no autoridade supervizaun, nune'e mós ba institusaun estadu seluk ne'ebé iha knar atu prevene no kombate krime subjasente sira.

Diagrama tuir mai ilustra oinsa UIF hala'o knar, no fonte informasaun oin-oin nu'udar baze prinsipal ezekusaun knar refere, nune'e mós relasaun kordanasaun no koperasaun entre UIF ho entidade sujeita sira; autoridade kompetenti; autoridade supervizaun; no FIU internasionál sira.

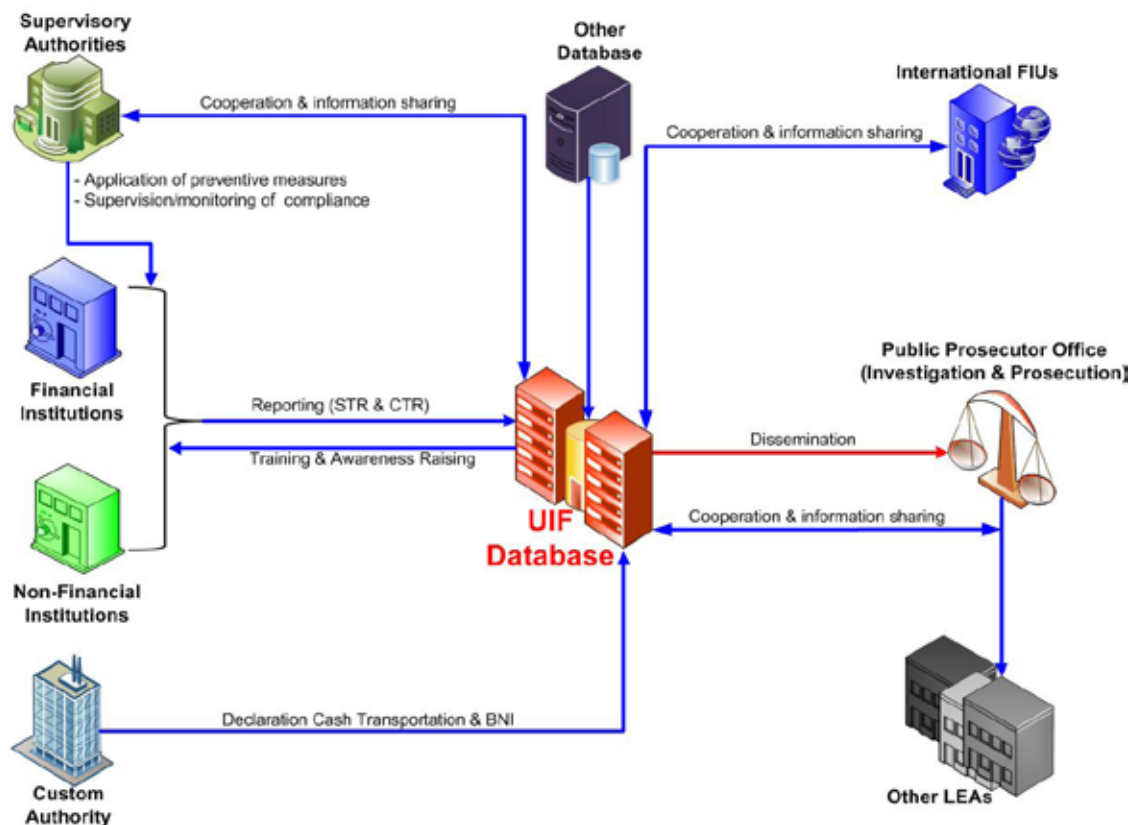
Leste transporting cash or bearer negotiable instrument amounting US\$10,000.00 or above, must declare the same to the Customs Authority and that copies of such declarations must be immediately conveyed to the UIF.

**Access to information**

Collecting various information from different source is an essential element in the whole process as it is crucial to add value to an STR analysis and to propose reported cases deemed suspicious to the PPO. Therefore, UIF has been granted access to information power under article 21 of AML/CFT Law. This includes requesting additional information from reporting entities, police authorities, judicial and supervisory authorities as well as other state institutions vested with the authority to prevent and combat related predicate crimes.

The chart below is an illustration on how UIF implement its competences; different source of information that UIF's works is based on; as well as coordination and cooperation relationship with reporting entities; law enforcement authorities; supervisory authorities; and international Financial Intelligence Units.

Diagrama 2: Prosesu knar no relasaun ho intervenienti sira Diagram 2: UIF's Business Process and relationship with stakeholders





Kon | Con

Akr | Acr

Lia | Mess

Kap 1 | Cha 1

Kap 2 | Cha 2

Kap 3 | Cha 3

Kap 4 | Cha 4

Kap 5 | Cha 5

Ane | App

# **Kapítulu** **3** **Chapter**

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## **Rezultadu no Pontu** **Importante sira iha** **2016 Achievements and** **Highlights of 2016**

Kon | Con

Akr | Acr

Lia | Mess

Kap 1 | Cha 1

Kap 2 | Cha 2

Kap 3 | Cha 3

Kap 4 | Cha 4

Kap 5 | Cha 5

Ane | App

### 3.1

## Análize RTS no Disseminasaun Process of STR Analysis and Dissemination

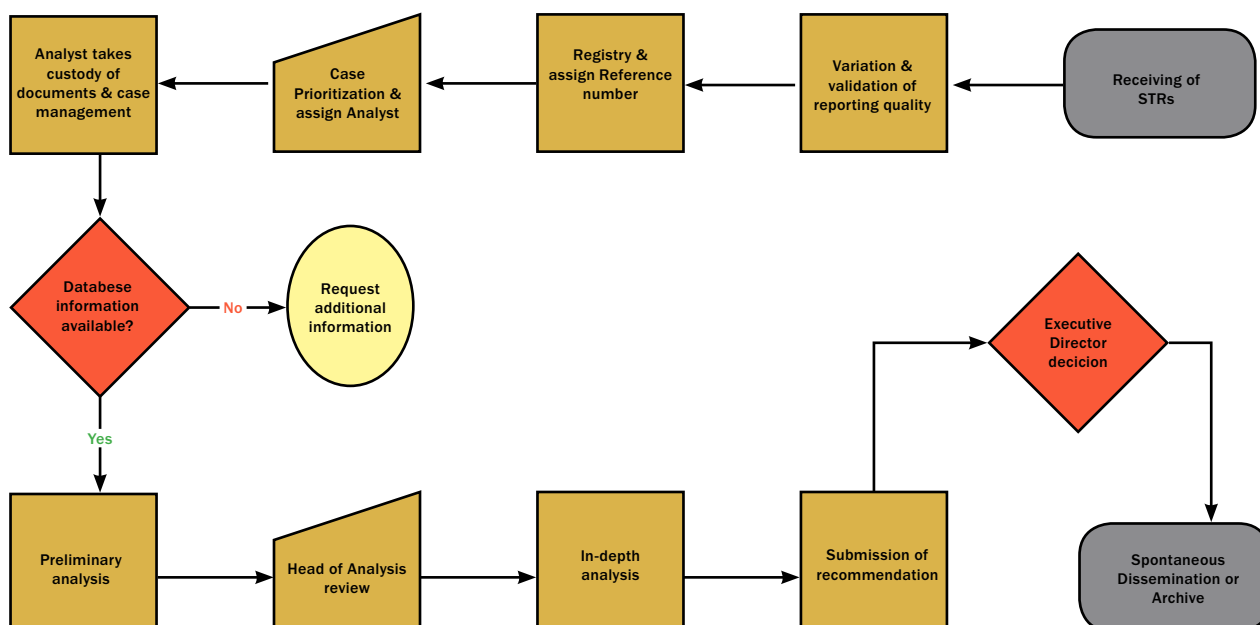
UIF nia funsaun pirinsipál mak “Analiza” ho objetivu atu haknar-an em parseria no hametin koperasaun ho PJR mós autoridade kompetente seluk hodi efetivamente kombat BK/FT no krime seluk-seluk. Inklui mós análise operasionál bá RTS sira ne’ebe simu ona, atu determina ligasaun no alvu husi BK/FT ho krime subjacente. Nune’e mós halo’o análise estratéjika hodi identifika ameasa no vulnerabilidade husi BK/FT hodi nune’e bele reforsa polítika ABK/KFT no ajuda UIF no instituisaun estadu atu haré tendénsia ba fator hirak ne’e.

Iha Dezembru 2016, UIF adopta ona padraun prosedimentu operasionál (SOP) sira ne’ebe deskreve prosesu análise ne’ebé tuir melhores práticas. RTS ne’ebe simu sei analiza no dissemina espontaneamente hanesan ilustra iha diagrama tuir mai.

The UIF core function is Analysis and aims to establish partnership to enhance domestic cooperation with PPO and other law enforcement Authorities to effectively combat money laundering, terrorist financing and other crimes. This includes operational analysis on STRs received from the reporting entities, to determined and link between targets of ML/FT and predicate offenses. Also the strategic analysis to identify threat and vulnerability of ML/FT in order to support strengthen AML/CFT policies and help UIF and other state entities with the trends and patterns.

The UIF standard operating procedures (SOP) was adopted in December 2016 describes the operating process of analysis which meets the best practices. The STRs received are analysed and spontaneously disseminated following the below process.

Diagrama 3: Prosesu analiza RTS no disseminasaun spontáneu Diagram 3: STR analysis and spontaneous dissemination process



Haré ba ilustrasaun iha diagrama 3, UIF sei la halo análise imediata ba RTS, tanba ne'e SOP deskreve ona prosesu prioritizasaun atu ajuda UIF aloka rekursu dsiponível no prioritiza RTS hotu-hotu ne'ebe simu ona bazeia ba nível risku tuir informasaun ne'ebe apresenta iha RTS refere. Prioritizasaun ba RTS diversifika ba kategoria tolu (baixo, médio, alto) atu fó segimentu ba prosessu análise RTS konforme nia nível risku no prioridade.

As the diagram 3 illustrates, all STRs cannot be analyzed immediately, therefore the SOP provides prioritization process to help UIF allocate its' resources and to effectively prioritize STRs according to level of risks associated with the reported activity. The case prioritization diversifies all STR in 3 categories (low; medium; high) to be able analyzes STRs in conformity with their risk and priority.

## 3.2

# Dezenvolvimentu no Tendência RTS Trend and Development of STRs

### 3.2.1

#### Dadus Estatística Statistical Data

Iha 2016, UIF simu RTS ho totál 74 ne'ebe mai hosi instituisaun bankária, no RTS hotu-hotu submete ba prosesu análise preliminar. Iha prosessu ne'e UIF identifika RTS 16 ho nível risku boot ho indikasaun brankeamentu kapitál no mós krime subjasenti balu, hafoin halo análise kle'an no dissemina ba Prokuradoria Jerál Repúblika.

Hosi RTS 58 selesiona tan ona 11 hodi submete ba prosessu "análize kle'an". Iha fatin seluk, RTS 47 mantein iha arkivu temporáriu, maibé bele hasa'e ba faze análise kle'an iha kualker momentu, wainhira iha informasaun foun ka informasaun adisionál ruma ne'ebé UIF kontinua halo esforsu atu koleta hodi fornese aumenta valór análise no haruka ba autoridade competente. Em jerál, feedback husi PJR no autoridade competente sira seluk indika qualidade informasaun ne'ebe UIF dessimina responde duni sira nia espetativa no fasilita prosessu investigasaun brankeamentu kapitál no mós krime relevante seluk.

Komparasaun ba dadus hanesan ho tinan dahuluk nian, laiha mudansa maka'as iha número totál RTS ne'ebe simu ona.

During 2016, UIF received a total of 74 STRs reported by banking institutions, where all have undergone preliminary analysis. UIF identified 16 high risk STRs with strong indication of money laundering and relevant predicate offenses for in-depth analysis and disseminated to Public Persecutor Office.

In addition, 11 out of 58 STRs were also selected for in-depth analysis and are ongoing process of collecting additional information. A total of 47 STRs are temporarily archived as it might be escalated to in-depth analysis stage, at any time, once new information and/or additional information that UIF continued making efforts to collect is available in order to provide a value added product to law enforcement authorities. In general, the feedback back from PPO and other LEAS indicated the quality of analytical reports that UIF disseminated meets the expectations and facilitates investigating money laundering and other cases.

In comparison with the same figure of the first year, there was not much changes in total number of STRs reported.



Tabela 2: Númeru simu RTS, analiza, no dissemina Table 2: Number of STRs received, analyzed and disseminated

Relatoriu Tranzasau Suspeitu Suspicious Transaction Reports				
Tipu Entidade Sujeita Type of Reporting Entities	Asaun Actions	2016	2015	Variánsia Variance
Banku Banks	Simu Received	74	68	8.82%
	Analiza Analysis	74	68	8.82%
	Desiminasau Spontáneu Spontaneous Dissemination	16	4	300.00%
	Iha Prosesu On-going Analysis	11	0	0.00%
	Arkivu Temporáriu Temporary Archived	47	64	-26.56%

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Relatóriu Anual 2016  
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Hanesan ho tinan kotuk, UIF kontinua halo pedidu informasaun adisionál ba instituisaun bankária no mós ba instituisaun autonomu sira seluk hamutuk 67 ho objetivu atu reforsa análie RTS ne'ebe la'o hela. Númeru ne'e inklui *followup* ba pedidu autoridade komptente.

Similarly to previous year, UIF continues to make formal request for additional information of 67 to the reporting entities including to other autonomous entities with objective to enforced ongoing analysis of STRs. This number includes the follow up request to complete analysis and information solicited by LEAs.



## 3.2.2

### Tendénsia RTS Trends of STRs

Tabela 3: Pozisaun Estatística Tipolojia RTS (tuir ordén frekuénsia) Table 3: Ranking of Statistics on Typologies of STRs (in order of occurrence)

Nú No.	Tipolojia Typologies
1	Depóritu ho valor boot ho fonte osan la klaru; levantamentu numeráriu ho valor boot no iregulár Large deposits with non-verifiable source of funds; and irregular large cash withdrawals
2	Utiliza konta pessoal hodi movimenta rezultadu negósiu ho valor boot; no la koresponde ho prefíl kliente Large transactions using personal accounts for business purposes; and not matching with the customer's profile
3	Simu tranferénsia Internasionál montante boot, imediatamente halo levantamentu ka transfere; no la konsistente ho perfíl kliente Large international inward transfers that are immediately withdrawn or transferred; and not consistent with customer's profile
4	Depóritu valor boot no imediatamente halo transferénsia internacional Large deposits with immediate international outward transfers
5	RTS iha relasaun ho RTS anteriór ne'ebe arkiva iha baze dadus UIF STRs related to previous STRs temporarily archived in the UIF data base
6	Tranzasaun valor boot ho ligasaun ba projetu Governu hosi funsiunáriu públiku Large transactions by public servants linking to Government projects
7	Falsifikasaun estratu konta bankária hodi partisipa prosesu tenderizasaun projetu Governu Falsification of bank statements for participation in the government project tendering process
8	Selu-seluk* Others*

\*Tipolojia seluk inklui tentativa halo tranzasaun maybe la susesu; possibilidade koresponde ho lista internasionál sira “watch-list” ka “black list”; fraude ba uzu kartaun credit/debit no laiha autorizasaun husi titular kartaun; asociadu ho kazu fraude sira seluk; titulár konta bankária ho atividades jogu ilegál; no konta ne'ebe la ativu maibé simu cheque legál ho volume boot.

\*Other typologies including attempted but unsuccessful transaction; possible match with international watch-list or other black list; fraudulent transaction using credit/debit card with no card holder's authorization; association with other fraud cases; bank account holder with illegal gambling activities; and inactive account receiving high volume of certified cheque.

## 3.3

## Dadus Estatística RTN Statistical Data of CTRs

Tuir Lei ABK/KFT artigu 3, negósiu Operadór Transfere Osan kategoria hanesan instituisaun finansiamentu ne'ebé iha obrigasaun hato'o relatóriu rua, RTS ho RTN. Instrusaun BCTL nu. 01/2013, 27 Setembru, kona-ba Lisensa no Supervizaun, obriga OTO sira no agente hotu atu implementa medida preventiva mínimu ABK/KFT nian hanesan tuir mai ne'e:

- Atu foti identifikaun kliente bainhira montante tranzasaun kiik liu US\$ 500;
- Atu hetan kópia identifikaun bainhira tranzasaun ekivalente ou liu US\$ 500;
- Atu husu informasaun kona-ba orijin osan no rajaun halo tranzasaun bainhira montante ekivalente ka liu US\$ 2,500;
- Atu hato'o relatóriu ba UIF kona-ba tranzasaun hotu ho montante US\$ 2,500 bainhira suspeitu ka iha razaun forte katak fundu ka osan ne'e nia orijin mai husi krime subjacente, ka iha indikasaun brankeamentu kapitál ka finansiamentu terorizmu.

Tuir rejistu 2016, iha OTO sia ne'ebé hetan lisensa no kontinua hato'o relatóriu RTN ba UIF no konsolida iha UIF nia baze dasus. Iha sorin seluk, laiha OTO ida mak hato'o relatóriu RTS ba UIF iha tinan ida ne'e nia laran ne'ebé mak afeta serbisu UIF.

Under article 3 of the AML/CFT Law, the businesses of Money Transfer Operators (MTOs) are categorized as financial institutions with reporting obligation of both STRs and CTRs. Moreover, the BCTL Instruction no. 01/2013 of 27 September, on the Licensing and Supervision, requires MTOs and its Agents to implement minimum AML/CFT preventative measures as the following particulars:

- Undertake customer identification when the amount of the transaction is less than US\$500;
- To maintain copy of the identification for transactions equivalent or above US\$500;
- To request information on source of fund and reason for conducting the transaction if the amount is equivalent or above US\$2,500;
- To report to UIF all transactions equal to US\$2,500, to report any suspicion to UIF, whenever they suspects or has reasonable grounds to suspect that funds are the proceeds of crime, or indication of money laundering or financing of terrorism.

As of 2016, there are nine licensed MTOs and continued to report the threshold CTRs to UIF which have been consolidated into UIF database. On the other side, none of MTOs comply with the obligation to file STRs and this continued to affect the work of UIF during the year under review.

Tabela 4: Numeru Montante Osan Tama/Sai no Valór RTN Table 4: Number of inward/outward amount and value of CTRs

Entidades Sujeitu Reporting Entities	2016		2015		Variance (%)	
	Númeru RTN Number CTR	Montante Amount	Númeru RTN Number CTR	Total Montante Total Amount	Númeru RTN Number CTR	Montante Amount
<b>OTOs</b>						
<b>Tranferensia Sai Outward Remittances</b>	5,525	32,336,335.21	4,314	22,330,775.81	28.07%	44.81%
<b>Tranferénsia Tama Inward Remittances</b>	1,651	6,077,135.59	1,367	5,227,784.71	20.78%	16.25%

## 3.4

## Deklarasaun Transporte Moeda no TPN

### Declaration of Cash Transportation and BNI

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Deklarasaun Transporte Moeda no TPN  
Declaration on Cash Transportation and BNI

Informasaun seluk husi autoridade kompetente sira ne'ebé mak UIF uza ba análize , bazeia ba deklarasaun transporte moeda (DTM) no Títulu Portadór Negosiavel (TPN), inklui mós informasaun ne'ebé la deklarara no deklarasaun falsu, autoridade Alfandega tenke fornese ba UIF tuir Lei ABK/ KFT artigu 7. Bainhira simu informasaun hirak ne'e, UIF sei hatama hotu ba baze dadus tanba informasaun hirak ne'e iha valór signifkante atu suporta analiza RTS.

Obejtvu husi rekerimnetu legál hirak ne'e, atu permiti autoridade kompetente sira kontrola movimentu osan ho montante US\$ 10,000 ka liu no konsekuentemente bele iha ligasaun ho atividade suspeita ba brankeamentu kapitál ka finansiamentuamentu terorizmu.

Durante períodou relatóriu ne'e, UIF la rejistu kualker informasaun konabá deklarasaun transporte moeda no TPN.

Other law enforcement information that UIF analysis's work is based on is declaration on cash transportation and bearer negotiable instruments (BNI) which includes non-declared information and any false declaration that Custom Authority shall provide to UIF in accordance with article 7 of the AML/CFT Law. This information will be warehoused into UIF data base as it has significant value to support STR analysis.

The purpose of this legal requirement is to enable competent authorities controlling physical movement of cash of US\$10,000 or more and consequently it will permit linkages with any suspected money laundering or terrorist financing activity.

During the year, UIF has not recorded any information concerning declaration on cash transportation and BNI.

Kon  
ConAkr  
AcrLia  
MessKap 1  
Cha 1Kap 2  
Cha 2Kap 3  
Cha 3Kap 4  
Cha 4Kap 5  
Cha 5Ane  
App

## 3.5

## Pedidu Husi Autoridade Kompetente

### Request of Law Enforcement Authorities

Hanesan mós períodu relatóriu tinan kotuk, UIF ativu kolabora ho autoridade competente hotu liu-liu ho Gabinete Kombate Korruptsaun no Krime Organizadu ne'ebé estebelse iha Prokuradória Jerál Repúblika nia okos.

Durante períodu revizaun, UIF kontinua simu pedidu informasaun no suporta tékniku ho total hamutuk 30 husi autoridade competente sira. Pedidu hirak ne'e barak liu iha relasaun ho atividade brankeamentu kapitál no kategoria ofensa sira seluk ne'ebé iha ona investigasaun.

Kompara ho figura hanesan iha 2015, laiha mudansa boot ho total número pedidu ne'ebé autoridade competente husu. Ida ne'e tanba autoridade competente sira ladun halo'o investigasaun paralelu kona-ba brankeamentu kapitál. Observa situasaun ne'e, iha enkontru regulár ho autoridade competente, UIF levanta kestaun kona-ba importánsia hodi halo investigasaun paralelu ba aspetu finansiamentu kona-ba krime subjasente sira.

Similarly to previous reporting period, UIF actively collaborate with PPO through the special Section for Combating Corruption and Organized Crimes and other law enforcement authorities.

During the period under review, UIF received a total of 30 requests for information and technical support from LEAs. The request mostly related to suspected money laundering activities and other categories of offences that are being initiated investigation

In comparison with the same figure of 2015, there was not much changes in total number of LEAs request for information. This is due to other LEAs have made very few parallel investigation. UIF in its regular meeting with LEAs has raised the issue of importance to undertake parallel investigation of the financial aspect of predicate offences.





Table 5: Request for information from LEAs Table 5: Request for information from LEAs

Pedidu Informasaun no Apoiu Tékniku Request for Information and Technical Support									
Kategoria Infrasaun Subjasenti Predicate Offences Categories	2016					2015			
	Pedidu ba Informasaun Request Information	Pedidu Analiza Request Analysis	Pedidu Infor & Analiza Request Info & Analysis	Desiminasaun Dissemination	Pedidu ba Informasaun Request Info	Pedidu Analiza Request for Analysis	Pedidu Infor & Analiza Request Infor& Analysis	Desiminasaun Dissemination	
<b>Brankeamentu Kapital Money Laundering</b>	7	0	7	14	2	3	1	6	
<b>Korrupsaun &amp; Kazu relevante Corruption &amp; Connected Cases</b>	1	0	4	5	2	1	2	5	
<b>Fraude Fraud</b>	0	1	4	5	0	0	3	3	
<b>Droga Drugs</b>	0	0	1	1	0	0	3	3	
<b>Tráfiku Umanu &amp; Eksplorasaun Seksuál Human Trafficking &amp; Sexual Exploitation</b>	1	0	1	2	0	0	1	1	
<b>Falsifikasaun agravada Aggravated Falsification</b>	0	0	1	1	0	0	1	1	
<b>Seluk-seluk * Others*</b>	1	0	1	2	0	2	6	8	
<b>Totál &amp; Desseminasaun tuir Pedidu Total &amp; Disseminations Upon Request</b>	<b>10</b>	<b>1</b>	<b>19</b>	<b>30</b>	<b>4</b>	<b>6</b>	<b>17</b>	<b>27</b>	

\*Other predicate offences were mainly related to suspected harmful administration, illegal gambling, organized crime, and falsification of documents.

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## 3.6

## Dezenvolvimentu Institusionál, Formasaun, Sensibilizasaun ba públiku Institutional Development, Training and Public Awareness

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## 3.6.1

### Dezenvolvimentu Institusionál Institutional Development

Hahú kedas hosi loron operacional, UIF tau prioridade ba dezenvolvimentu kapasidade institusionál. Iha tinan ida ne'e, UIF hala'o mudansa iha aspetu oin-oin ne'ebé mósu hanesan tuir mai ne'e.

Iha ámbitu kolaborasaun ho BCTL, rekruta ona funsionáriu foun nain rua, no ofisiálmente assumi kna'ar nu'udar Oficial analista no koperasaun iha loron 1 Jullu 2016. Atu asegura funsionáriu foun komprende didiak devér no responsabilidade, sira tenke hetan treinamentu kapasitasaun adekuaudu hodi hasa'e sira nia kapasidade. Nune'e, UIF organiza ona treinamentu no workshop ba funsionáriu sira hodi hasa'e koñesimentu no kapasidade atu bele atinji objetivu sira ne'ebé defini ona.

Ho assisténsia téknika hosi Grupu Banku Mundiál (GBM), UIF kompleta ona padraun prosedimentu operasionál (SOP) kompriensivu ba funsaun prinsipal hotu-hotu hahú hosi área analize RTS, jestaun ba prosessu kazu, no koperasaun. SOP hirak ne'e formalmente adopta ona nu'udar dokumentu ofisiál UIF nian hahú Dezembru 2016, ho objetivu tuir mai:

- a) Fo instrusaun kalru ba funsionáriu sira oinsa ezekuta determinada funsaun;
- b) Iha konsisténsia ba atividade hotu ne'be dezempenha iha UIF;
- c) Mata-dalan ba funsionáriu oinsa uza formuláriu padraun no tuir prosessu aplikável dezempeñu funsaun;
- d) Mata-dalan ba UIF, em jeral, atu bele alkansa rezultadu di'ak ho efetividade no efisiensia.

Since establishment, UIF has been focused on the institutional capacity development, where during the year, UIF have tremendously improved several aspects as reveals in the following descriptions. In collaboration with BCTL, two additional staff has been successfully recruited and officially assumed the job as Analyst and Cooperation Officer respectively since July 1st 2016. To ensure staff clearly understands their duties and responsibilities, it is believed that they should be equipped with adequate training to strength capabilities. To this end, UIF organized several training and workshop involved existing and new staff in order to improve their capabilities and to be able achieving the defined goals

Under the technical assistance provided by the World Bank Group (WBG), UIF has completed a comprehensive set of standard operating procedures (SOP) for the major functions in the STR analysis area, data management, and cooperation. These SOPs in which have been formally adopted as official documents since December 2016, are aiming to provide:

- a) Instruction to staff members on to how carry out certain functions;
- b) Consistency in how activities are carried out within the UIF;
- c) Guidance to staff members to use templates and the associated letter templates, and detail the processes applicable when carrying out their functions;
- d) Guidance to assist UIF achieves, in general, better results in terms of effectiveness and efficiency.

## 3.6.2

### Formasaun ba Funsionáriu UIF Capacity Building Training to UIF Staff

Nu'udar instituisaun foun ida, hakbi'it rekursu umanu no dezvoltamentu kapasidade, importante tebes hodi nune'e bele hala'o serbisu ho efetivu no efikás. Ho objetivu ne'e mak UIF, servisu hakbesik-an ba parseiru internasionál sira, ne'ebe fornese apoiu tékniku no finanseiru hanesan: GAP; GBM; EUA; Canada; PPATK; inklui mós UIF Portugal; hodi ajuda dezvoltave instituisaun ne'e liu hosi kapasitasaun no atividade seluk ne'ebe benefisia UIF.

Durante periodu ne'e, funsionáriu UIF atende treinamentu no workshop oin-oin hanesan tuir mai ne'e:

#### Nivel Nasionál

- Kursu orientasaun - funsionáriu foun sira, atende kursu orientasaun ne'ebé organiza husi BCTL. Hanesan bain-bain, sesaun ne'e iha objetivu primáriu atu introdúz funsaun banku Sentráil; rekizitu jeral hosi lei no regulamentu relevante sira; rekursu umanu; no termu referénsia aplikável ba funsionáriu BCTL.
- Kursu orientasaun - Funsionariu UIF mós atende kursu orientasaun ne'ebé fornese husi UIF. Matéria jeral kuaze hanesan, hahú ho introdusaun ba organizasaun no funsaun prinsipál UIF nian; enkuadramentu legál ba ABK/KFT; inklui mós sesaun prátika durante período treinamentu.
- Téknika análise finanseiru - realiza ho apoiu hosi APG ho fundu doador EUA nian, permiti Tékniku Senior rua husi PPATK fó formasaun ba funsionáriu UIF ne'ebe foka liu ba kestaun téknika analiza; kordenasaun no koperasaun ho autoridade competente sira iha nível nasional.
- Formasaun conjunta ABK/KFT - UIF konsege halibur rekursus hotu hodi fasilita formasaun rua hanesan (i) formasaun hasaé kapasidade lora tolu eskuzivu ba funsionáriu UIF; (ii) formasaun conjunta ne'ebé involve funsionáriu UIF, responsável compliance sira, prokuradores/ofisial justisa no investigadores hosi PCIC, CAC, no representante juiz Distritu Dili. Objetivu prinsipál husi eventu daruak ne'e,

As a newly established institution, strengthen human resources and capacity development are very important in order to carry out the jobs effectively and efficiently. For this purpose, UIF has been working very closely with the international partners who provided both technical and financial support such as: the APG and the WBG; United States; Canada; Pusat Pelaporan dan Analisis Transaksi Keuangan (PPATK); and also the FIU of Portugal; to help developing this institution in terms of capacity building and other activities directly benefits UIF.

During the period under review, various training workshops and seminars both at national and regional level have been attended by UIF staff as follows:

#### National level

- Induction Course - newly recruited staff attended induction course as an introduction to central bank functions; general requirements under relevant laws and regulations applicable within BCTL jurisdiction; administration and human resource issues; also the general terms of reference for BCTL employees.
- Induction course - UIF staff attended similar course provided by UIF. This aimed primarily as introduction to UIF organization and core business functions; AML/CFT legal framework, including delivery of practical sessions that was taken place over the training period.
- Techniques of Financial Analysis - under the technical assistance arranged by the APG with United States funding, two senior officers from PPATK have delivered capacity building training on techniques of financial analysis; mechanisms of coordination and cooperation with domestic LEAs; and access to public information under possess of other state institutions.
- Joint AML/CFT Training - UIF was able to bring suitable training resources to facilitate two major training events (i) a three days training provided exclusively to UIF staff; and (ii) a joint capacity building workshop which

alén de hasa'e kapasidade tékniku konabá ABK/KFT, iha mós objetivu atu hametin kordenasaun no koperasaun ho parseiru sira iha síkulu intelijensia. Eventu rua ne'e fasilita husi Sr. Vincent Chipeta, Analista Senior hosi FIU Malawi.

- Formasaun konabá krimi informátiku “*cybercrime*” no terorizmu – Funsionáriu UIF atende formasaun semana ida organiza hosi PCIC. Partisipante sira husi instituisaun diferente hanesan Alfandega, Polísia Nasionál, UIF, Juizes, no CAC no fasilita husi peritus krimi informátiku no terorizmu hosi Polísia Judisiária, Portugal.

- Semináriu konsolidasaun estadu diretiu – Funsionáriu UIF mós partisipa iha semináriu organiza hosi PCIC ne'ebé hanesan Programa Justisa iha Timor-Leste ho objetivu atu hametin valór demokrásia, monitorizasaun no transparénsia liu husi kapasitasaun ba instituisaun.

- Semináriu konab'a prevensaun no kombat droga iha Timor-Leste – funsionáriu UIF atende semináriu refere ne'ebé organiza hosi organizasaun não-governamental “Fundação de Cores del Amor” Timor-Leste. Tema semináriu relaciona ho prevensaun no rehabilitasaun ba dependentis aimoruk droga, ho objetivu atu dissemina informasaun konabá efeito negativu husi Droga ba futuru nasau ne'e nian.

brings participants from public and private sector together to have a same common knowledge of the risks and jointly combat ML/FT. This involves UIF staff, Compliance Officers, Prosecutors/Justice Officers, special Policemen/PCIC and representative of judges from Dili District Court. The purpose of the second event, which covered FIU roles; investigators role; importance of coordination and cooperation between FIU and LEAs, etc; besides building technical capacity on AML/CFT issues, also seeks to enhanced coordination and cooperation between stakeholders within the intelligence cycle. Both programs were facilitated by Mr. Vincent Chipeta, a senior financial analyst from FIU Malawi.

- Training on Cybercrime and Terrorism - UIF staff attended a week training provided by PCIC with participants from different institutions such as Customs, National Police, UIF, Judges, and CAC. The training subjects focused on Cybercrime and Terrorism and were delivered by two experts from Judiciary Police from Portugal.

- Consolidation of Rule of Law – UIF staff participated a full day seminar organized by PCIC as part of Justice Program in Timor-Leste. The seminar has the objective to strengthening democratic values of controls, monitoring and transparency trough institutional capacity building.

- Prevention and Combating Drugs in Timor-Leste – UIF staff attended seminar organized by a Non-profit organization “Fundação de Cores del Amor, Timor-Leste”. This NGO so far has been dealing with prevention and rehabilitation of dependencies of drug users. The seminar that brings together speakers from Ministry of Justice, National Police, and experts from Indonesia, has the purpose to disseminate information regarding drugs negative impact to the country.



## Nível Regional

- Iha nível regional (Ázia/Pasífiku), fuinsionáriu UIF atende *Joint Typologies no Capacity Building workshop*, organiza husi APG no MENAFATF iha Jeddah, Reinu Saudi Arabia. Nu'udar APG nia soru-mutu regular, programa tinan ne'e nia objetivu atu komplementa projetu konjunta hosi APG no MENAFATF hodi dezenvolve serbisu GAFI nian no seluk tan atu komprende diak liu tan konabá oinsa individual terrorista ka organizasaun terorista sira utiliza ona média sosiál ka sei utiliza iha futuru. Nune'e mós atu deskobre fator ameasa, fahe ba malu esperiéncia nivel rejional nian, no konsidera biban ruma atu hametin koperasaun internasionál, atu avalia no responde ba risku FT ne'ebé finansia liu husi servissu média sosiál nian. Diskussaun sira durante workshop ne'e, kobre tópiku oin-oin hanesan, finansiamentu terorizmu no média sosiál; BK liu husi média eletróniku; dezafiu sira atu rekupera fali produtu krimi korupsaun ija jurisdisaun seluk; identifika melhores práttikas operacional; no bareira sira ne'ebe hassoru iha fahe informasaun ba malu iha nível nasional.
- Programa formasaun ba nasaun Afrika ho Lian ofisial Portugues no Timor-Leste –Funsionáriu UIF atende formasaun ba formadores ne'ebé organiza husi PACED, iha Sentru Estudu Judisiária Lisboa, Portugal, fulan ida hahú hosi loron 17 Otubru to 14 Novembru 2016. Objetivu husi formasaun ne'e, atu hasa'e kapasidade partisipante sira konabá implementasaun instrumentu legál, adiminstrativu no nia prosedimentu hotu.
- Tékniku analiza finanseira - UIF serbisu hamutuk ho parseiru internasionál sira atu ajuda dezenvolve instituisaun ne'e hodi hasa'e kapasidade no atividade seluk ne'ebé iha benefísiu direta ba UIF. Iha biban ne'e, Tékniku ida atende treinamentu kapasitasaun ne'ebé fornese husi UIF Portugal. Matéria sira kobre, prosesu simu relatóriu, analiza no disseminasaun; jestaun ba dados no seguransa; mekanizmu koperasun iha nivel nasional no internasionál; inklui mekanizmu ba asesu informasaun.

## Regional level

- At regional (the Asia/Pacific) level, UIF staff attended Joint Typologies and Capacity Building workshop organized by the APG and MENAFATF in Jeddah, Kingdom of Saudi Arabia. As part of APG's regular meeting, this year program aimed to complement a joint project between the APG and MENAFATF to build on recent work by the FATF and others to better understand how social media are being used, or might be used, for TF by individual terrorists and terrorist organisations. Moreover, to examine the threat landscape, share regional experiences and consider opportunities to deepen international cooperation, to assess and respond to TF risks which is financed through social media services. There was breakout sessions covered the following: terrorism financing and social media; ML through electronic means; challenges of pursuing the proceeds of corruption in foreign jurisdictions; identifying operational best practices and barriers to domestic interagency information sharing.
- Training Program for African Portuguese Speaking Countries and Timor-Leste - UIF staff attended a regional joint training for trainers organized by the PACED and took place at the Judiciary Training Center in Lisbon, Portugal, from 17 October to 14 November 2016. The purpose of training was to strengthen knowledge of participants on the implementation of legal instruments, administrative and procedures.
- Techniques of Financial Analysis - Under bilateral arrangement with FIU of Portugal, permitted UIF staff attended capacity building training for week duration to increase knowledge and practical experiences in the areas of: process of receiving reports, operational and strategic analysis including dissemination and feedback; data management and security; domestic and international cooperation; including mechanisms for access to information.



*Abertura seremónia iha Hotel Novo Turismo - - Joint training workshop atende husi Governadór BCTL; Prokuradr Jerál; Country Director WBG; CEO Banku Komersial sira; Komisáriu Anti-Korrupsaun; SupervizórBanku; Compliance Officers; Investigadores husi PPO; PCIC; CAC*

*The opening ceremony for the Joint training workshop attended by Governor of BCTL; Prosecutor General, Country Director of WBG; CEOs of commercial banks; Commissioner of Anti-Corruption; bank supervisors; Compliance Officers; Investigators from PPO; PCIC; and CAC, at Novo Tourism Hotel, Dili*



*Funsonáriu foun sira tuir kursu introdusaun iha Sala Treinamentu BCTL All newly recruited staff attended induction course at BCTL training room*

Kon | Con

Akr | Acr

Lia | Mess

Kap 1 | Cha 1

Kap 2 | Cha 2

Kap 3 | Cha 3

Kap 4 | Cha 4

Kap 5 | Cha 5

Ane | App



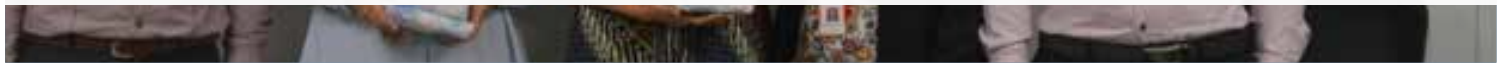


*Ekipa UIF iha sesaun ikus treinamentu workshop loron tolu ne'ebé fornese husi Sr. Vincent Chipeta, Analista Senior, UIF Malawi UIF team at closing session of a three days in-house training workshop provided by Mr. Vincent Chipeta, senior financial Analyst from FIU Malawi*



*Funsiunariu UIF hasai foto ho Treinadór nain 2 (Sra. Diana Soraya Noor no Sra. Intan) husi PPAK Indonézia durante Sesaun Treinamentu Tékniku Analiza*

*UIF staff posed together the trainers (Ms. Diana Soraya Noor and Ms. Intan) from PPAK Indonesia during the Technical Analysis Training sessions at BCTL training room*



*Delegasaun Timor-Leste (Juís Administradór Tribunál Distritál Dili; Adjunta Prokuradór Jerál; Sefi Investigasaun PCIC; no Tékniku UIF) iha formasaun ba formadór organiza hosi PACED iha Sentru Estudu Judisiária, Lisboa, Portugal Timor-Leste delegation (Administrator of Dili District Court; Deputy Prosecutor General; Investigation Chief of PCIC; and officer of UIF) at the Training for Trainers organized by PACED in the Judiciary Training Center, Lisbon, Portugal*



*Ofisial Koperasaun UIF nian atende MENAFATF/APG joint typologies no capacity building workshop iha Jeddah, Reinu Saudi Arabia UIF's Cooperation Officer attended MENAFATF/APG joint typologies and capacity building workshop in Jeddah, Kingdom Saudi Arabia*



### 3.6.3

## Reforsa Abilidade Instituisaun Financeira Skills Enhancement to Financial Institutions



*Directora-Ezekutiva no Tékniku UIF halo hela apresentasaun iha treinamentu ba Funisionariu BNCTL iha Hotel Ramelau The Executive Director of UIF and UIF's Officer provided training to BNCTL staff at the Ramelau Hotel, Dili*

Programa prioritária ida ba UIF mak kontinua hala'o programa edukativa hodi reforsa entidades sujeita sira nia koñesimentu no abilidade iha matéria relevante nune'e bele kumpri sira nia obrigasaun legál tur Lei ABK/KFT. Programa ne'e atinji liu hosi formasaun no workshop ba instituisaun financeira sira, liu-liu ba banku nasionál "BNCTL" no Operadór Transfere Osan (OTO) na'in-sia ne'ebé iha lisensa hala'o atividade negósiu ida ne'e. Matéria formasaun foka liu ba tékniku identifikaun tranzasaun/atividade suspeita akompañá ho kazu prátiku oi-oin no indikadóres BK atu fasilita sira nia kompreensaun, inklui mós matéria relvante ABK/KFT nu'udar parte sensibilizasaun.

Atu realiza programa refere, UIF kordena ho BNCTL hodi organiza workshop loron-baluk ba funsionáriu BNCTL sira iha loron 29 Setembru 2016. Workshop ne'e involve Responsável Compliance; Jerente Sukursal sira; no Ofisiais husi Munisípiu 12 ho RAEO. Workshop refere konta ho prezensa membru Konsellu Administrasaun BNCTL na'in rua ne'ebé responsabiliza área Operasionál; Jestaun Risku no Unidade Compliance.

The UIF continued to empower reporting entities with knowledge and skills to assist them in complying with their AML/CFT legal obligations as a priority program. This was achieved through conducting training workshops to selected financial institutions mainly national bank "BNCTL" and licensed Money Transfer Operators (MTOs). The training subject, focused on techniques for identification of suspicious activities with real case studies, ML indicators, and relevant AML/CFT awareness raising subjects.

In collaboration with BNCTL Management, UIF organised a half day workshop to BNCTL staff on September 29, 2016 where it involves Compliance Officer; Branch Managers and all front line officers from 13 municipalities. This workshop has full presence of two BNCTL Board members who's responsible for the areas of Operational; and Risk Management and Compliance Unit, respectively.





*Tékniku UIF hato'o apresentasaun ba patisipante OTO sira iha sala treinamentu. UIF's Officer delivered presentations to MTOs participants at BCTL training room, Dili*

Formasaun no workshop tipu hanesan, hala'o mós ba instituisaun OTO sira, iha loron 23 Outubru 2016. Partisipante formasaun workshop ne'e involve Jerente no Ofisiáis sira responsável ba Relatóriu, ho objetivu atu hakbi'it sira nia koñesimentu tékniku konabá oinsa identifika tranzasaun no atividade suspeita; inklui mós implementasaun medidas preventiva ne'ebe aplikável.

Kolaborasaun ho autoridade supervizaun "BCTL", programa formasaun hodi hasaé koñesimentu sei kontinua iha tinan tuir mai. Ida ne'e atu reforsa kapasidade intituisaun finanseira sira nian, liu-liu ba sira ne'ebe iha frakeza iha sistema ABK/KFT, atu asegura sira nia kumprimentu ba obrigasaun legal. Sei fo énfaze iha reforsu monitorizasaun ba tranzasaun kliente sira nian; hasa'e kapasidade hodi identifika tranzasaun suspeita no submete RTS ba UIF.

The workshop with similar training subjects was delivered to nine MTOs on October 23, 2016. The training workshop participants involved all Managers and Reporting Officers with main objective to help them understands techniques for identification of suspicious activities and to strengthen their awareness on the general preventative measures.

Collaboration with supervisory authority "BCTL", skills enhancement and awareness training programs will be continue in the coming year. This is to enhancing the capacity of financial institutions in particular those having week AML/CFT system, in order to secure compliance with their legal obligations. Emphasis will be made on enhanced monitoring of transactions of customers; enhance their ability to easily identify suspicious transactions and filing of STR to UIF.



## 3.7

# Koperasaun Nasional no Internasional Cooperation

Koperasaun no troka informasaun entre interveniente sira iha rejime ABK/KFT, vitál tebes ba prosesu tomak prevensaun no repressaun krimi BK/FT. Tamba ne'e UIF sei esforsu-an atu kopera nafatin tantu ho UIF konjénere sira iha nível internasional no mós iha nível nasional hanesan autoridade judisiária sira no autoridade kompetente seluk tuir dispozisaun legal hatur iha Dekretu Lei.

As the cooperation and information exchange between AML/CFT stakeholders is vital to the whole process of prevention and suppression of ML/TF, UIF has been working closely with law enforcement authorities through regular technical meetings; sharing relevant information as well provided technical support when requested.

### 3.7.1

## Koperasaun Institusional Institutional Cooperation

Iha nível nasional, UIF no Prokuradoria Jerál Repúblika formaliza tiha ona relasaun kordenasaun no koperasaun ne'ebé ezisti nanis ona, liu hosi asina Memorandu Entendimentu iha lora 21 Dezembru 2016.

At domestically level, UIF and Public Prosecutor Office have formalized coordination and cooperation that has been built since UIF establishment through signing a Memorandum of understanding (MOU) on 21 December 2016.

UIF inisia ona kontaktu ho Autoridade Kompetenti tolu atu, iha tempu badak, bele formaliza mós relasaun kordenasaun no koperasaun ne'ebe ezisti tiha ona, nune'e sei fasilita di'ak liu-tan koperasaun no troka informasaun intelijénsia

UIF has been in contact with other LEAs to formalize cooperation relationship in the coming year to better facilitate sharing of intelligence and to cooperate fully in the course of investigations into money laundering, predicate offences and terrorist financing.



*Doretora-Ezekutiva lidera fórum compliance officers iha salaun enkontru BCTL hodi diskute problema relevantes no dissemina konkluzan asesmentu risku nasional kona-ba BK/FT UIF's Executive Director led the Bank's Compliance Officers Forum at BCTL meeting room to discuss relevant issues and to disseminate the conclusions of national risk assessment on ML/TF at BCTL meeting Room, Dili*



*PJR asina Memorandum Entendimentu ho UIF, iha salaun sorumutu Konselu Superior majistratura no Prokurador Jeral The PPO has signed a Memorandum of Understanding with UIF, at the meeting room of Superior Magistrate Council of Public Ministry.*

Iha sorin seluk nível nasional nian, eezisti ona mekanismu kordenasaun no koperasaun ida hanaran Fórum Responsável *Compliance* (FRC) ne'ebe BTCL forma iha finál 2013 hodi halibur Responsável *Compliance* sira hosi setor bankáriu nune'e bele hametin relasaun diak.

UIF rekoñese importánsia Forum ne'e, tamba permiti fahe informasaun tipolojia, indicadores BK, no kestaun sira relasiona ho kuantidade no qualidade RTS. Ho FRC ne'e, UIF realiza sorumutu iha loron 19 Novembru 2016. FRC sei hala'o sorumutu regular kada fulan tolu hodi diskuti kestaun relevante ba interese mútua inklui fó *feedback* kona-ba utilizasaun RTS hosi AK, no atu asegura kumprimentu ba obrigasaun legal aplikável ba entidade sujeita sira.

On the other side within national level, there is a coordination and cooperation mechanism named Compliance Officers Forum (COF), formed by BCTL in the end of 2013, for the purpose of gathering all Compliance Officers from banking sector.

Given the importance of this Forum for sharing of typologies, red flags, as well as issues related to both quantity and quality of STRs, a COF meeting taken place on 19 November 2016. The forum will continue to take place on quarterly basis to discuss relevant issues of mutual interest including feedbacks concerning the use of STRs by LEAs, and to ensure compliance of reporting entitie's obligation.

## 3.7.2

### Koperasaun Internasionál International Cooperation

Hahú 2016, UIF implementa ona MOU konabá koperasaun no troka informasaun ne'ebé asina ona ho FIU Portugal iha Juñu 2015. Bazeia ba MOU ne'ebé asina, parte rua sei kopera hamutuk, dezenvolve no analiza informasaun relevante ba brankeamentu kapitál, krime subjasente asociadu no finansiamentu terorizmu no sei troka informasaun spontaniamente ka bazeia ba pedidu ba informasaun hotu-hotu ne'ebé disponível ka hetan tiha ona, tur prinsípiu repositividade. Iha ámbitu koperasaun ida-ne'e, UIF Timor-Leste obtain informasaun balu mak buka, atu bele kompleta analiza kazu BK hodi fó apoiu ba Autoridade Kompetente iha nível nasional no internasionál no ikus mai konsege kondena kriminozu sira ne'ebé komete brankeamentu kapitál no krimeinformátiku/cybercrime.

Started from 2016, UIF has been implementing cooperation under the MOU signed with FIU of Portugal in June 2015. Based on the signed MOU, parties will cooperate to assemble, develop and analyse information relevant to suspected money laundering, associated predicate offences and terrorism financing and will freely exchange spontaneously or upon request the widest range of information available or obtainable, based on reciprocity. This cooperation reveals confirmation on information that UIF has sought to complete its ML case analysis for helping both local and international law enforcement authorities, moreover, the offenders who committed money laundering and cybercrime have been successfully convicted in the United States.



*Tékniku UIF atende treinamentu iha UIF Portugal ne'ebé aranja liu hosi koperasaun bilaterál UIF's officer attended training at the FIU of Portugal under bilateral cooperation arrangement*

UIF ativamente buka oportunidade hodi estabelese koperasaun no kanál troka inteligéncia financeira ho UIF internasionál. Durante período ida-ne'e UIF hato'o ona proposta MOU, ne'ebé mak prepara bazeia ba padraun Groupu Egmont nian, ba instituisaun balun ne'ebé identifika ona no simu mós pedidu ne'ebé hanesan hosi FIU estranjeiru rua iha rejiaun APG. Pedidu sira-ne'e akompaña ho proposta MOU ne'ebé iha prosesu negosiasaun hela.

The UIF has been actively seeking opportunities to establish cooperation and financial intelligence exchange channels with other international FIUs. During the year UIF has proposed MOU, which was prepared based on the Egmont Group standards, to some identified institutions and also received similar request from two FIUs in the APG region. The request was accompanied with draft MOUs which are under process of negotiation.



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# **Kapítulu** **Chapter** **4**

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## **Partisipasaun iha** **Programa CNCBC no** **APG Participation in the** **Programs of the CNCBC** **and APG**

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Kap 2 | Cha 2

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Kap 4 | Cha 4

Kap 5 | Cha 5

Ane | App



## 4.1

# Komisaun Nasionál ABK/KFT The National Commission on AML/CFT



*Konsellu Ministru VI adopta Avaliasaun Nasionál Risku no planu estratejia no Planu Estratéjiku Nasionál ba ABK/KFT período 2016 – 2020, 14 Juñu 2016* The Council of Ministers of VI Constitutional Government endorsed the National Risk Assessment and National Strategic Plan on AML/CFT for the period 2016 – 2020, 14 June 2016

UIF involve ativamente iha programa sira nu'udar mandatu CNCBC nian liu-liu tamba IV Governu Konstitusional aprova alterasaun Rezolusaun no. 18/2016 iha Juñu hodi inklui UIF nu'uar membru ba CNCBC.

Iha enkontru regulár Komisaun Nasionál ida-ne'e, ko-presidenti desidi estabese Sekretariadu CNCBC nian iha Gabinete Ministru Justisa no ida-ne'e rekere mós kontribuisaun direta UIF nian. Durante 2016, UIF fó kontribuisaun ba servissu sekretariadu hanesan: preparasaun agenda reuniaun, relatóriu anuál konabá atividade CNCBC nian hodi submete ba Konsellu Ministru iha loron 14 2016.

UIF has been actively engaged in several activities under the CNCBC mandate particularly since the Government approved the amended Resolution no. 18/2016 of 29 June to incorporate UIF as one of the CNCBC members.

During the regular meeting of this national Commission, the co-chair has decided to place the Secretariat under the office of Minister of Justice and for that required UIF's direct contribution. In 2016, UIF has contributed with preparation of meeting agendas; annual report of the Co-chair detailing CNCBC activities performed during the year for submission to Council of Ministers on 14 June 2016.





*S.E. Primeiru Ministru VI Governu Konstitusional ofisialmente simu dokumentu ANR no PEN ne'ebe entrega hosi Co-Prezidenti (Ministru Justisa; Ministru MNEC) no Diretora Ezekutiva UIF H.E. Prime Minister of VI Constitutional Government officially received the NRA and NSP documents from the CNCBC Co-Chairs (Minister of Justice & Minister of MFAC) and UIF's Executive Director*

UIF hetan fiar hodi kordena implementasaun programa prinsipál rua (i) Avaliasaun Nasionál (ANR) konabá brankeamentu kapitál no finansiamentu terorizmu, (ii) dezenvolve Planu Estratéjiku Nasionál. Programa rua ANR no PEN ne'ebe implementa ho assistensia téknika hosi Banku Dezenvolvimentu Aziátiku, apresenta ba Konsellu Ministru no adopta ona iha 14 Juñu 2016.

Tuir ba, iha loron 7 Outubru 2017, S.E. Ministru Justisa konvoka sorumutu CNCBC nian hodi koalia konabá assuntu relevante balu; inklui fo biban ba membru sira ne'ebe partisipa Sorumutu anual APG nian ba dala-19 iha San Diego, EUA hato'o rezultadu sorumutu. Iha biban ne'e halo mós lansamentu ofisial ba ANR no PSN hodi disponibiliza ba asessu públiku.

UIF has been entrusted the role as coordinator to lead the process of other two main programs under CNCBC mandate: (i) to undertake national risk assessment (NRA) on money laundering and terrorist financing; and (ii) to develop a national plan (NSP). Both programs which implemented with technical and financial support provided by the Asian Development Bank (ADB), Timor-Leste has been finally completed and presented to Council of Ministers on 14 June 2016 and obtained political endorsement and support.

The CNCBC further meeting was taken place on 7 October 2016 where H.E. Minister of Justice officially launched NRA and NSP of Timor-Leste and made available to public access. Timor-Leste delegates for the 19th APG annual meeting in San Diego, United States, have also updated the CNCBC members with the general outcomes of the meeting.

## 4.2

## Grupú Ásia Pasifiku The Asia Pacific Group on ML

Nu'udar membru APG, Timor-Leste iha obrigasaun atu partisipa sorumutu APG nian, jerálmente, sorumutu oin rua kada tinan: (i) enkontru anuál ba membru hotu-hotu; no (ii) tipolojia anuál. Sorumutu rua ne'e, normalmente antesipa ho submisaun relatóriu progresu anuál; no relatóriu tipolojia hodi buka hatene metode no tendénsia ambienti brankeamentu kapitál nian.

Iha APG nia sorumutu anuál mak defíni polítika no foti desizaun, bai-bain desizaun sira foka kestaun pendentí hosi reuniaun anteriór; administrasaun no kestaun membru nian; relatóriu avaliasaun mútua; rede glóbál ABK/CFT no dezenvolvimentu tipolojia. Eventu ida-ne'e inklui enkontru paralela ho doadór APG hodi diskuti nesesidade asisténsia téknika no formasaun.

UIF kontinua hola parte iha delegasaun Timor-Leste nian (UIF, SERVE, PCIC) hodi atende Sorumutu Anuál APG ba dala 19 no Fórum Asisténsia Téknika&Formasaun iha San Diego, California EUA, hosi loran 5 to'o 8 Agostu 2016. Hanesan bai-bain, molok ba partisipa sorumutu refere, UIF kordena preparasaun relatóriu progresu anuál Timor-Leste nian no submete ba Sekretariadu APG iha períodu determinadu ho prazu loran 1 Abril kada tinan.

As the Asia Pacific Group (APG) member, Timor-Leste is required to meet on a regular basis, generally twice a year for two purposes (i) annual plenary meeting for all members; and (ii) annual typology which are normally anticipated with the submission of an annual progress report; and typology report to study the money laundering environment both methods and trends.

The annual meeting which is the primary policy and decision-making vehicle for the APG, focus its discussion on outstanding issues derived from previous meeting; governance and membership issues; mutual evaluation reports; global AML/CFT network and typologies development. The event includes parallel meeting with APG donors to discuss relevant training and technical assistance needs.

UIF continue to make part of Timor-Leste's delegation (UIF; SERVE; PCIC) to attend the 19<sup>th</sup> APG Annual Meeting and Technical Assistance Forum in San Diego, United States, from August 5th to 8th, 2016. Prior to this, UIF coordinated the preparation of Timor-Leste's annual progress report and submitted to APG Secretariat within the established due date of April 1<sup>st</sup>.

## 4.3

# Partisipasaun Seluk Other Participation

**Programa PACED** – Atividade seluk ne'ebé UIF hola parte iha tinan 2016 mak Programa ba Apoio Konsolidasaun Estadu Direitu ba País Afrikanu Língua Portugeza no Timor-Leste ne'ebé koñesidu ho naran PACED (akrónimu Português “Programa de Apoio à Consolidação do Estado de Direito aos PALOPs e Timor-Leste”).

Programa ida-ne'e kompostu hosi komité rua ho representasaun hosi Ministériu Justisa; Banku Sentrá; Ajénsia Anti-Korrupsaun; no Autoridade Kompetente sira seluk inklui UIF. PACED ne'ebé administra hosi Komisaun Europeia no Institutu Camões dezeña espesífika hodi tulun nasaun sira iha prosesu prevensaun no supresaun ba korrupsaun; brankeamentu kapitál no krime organizadu transnasionál prinsipalmente relaciona ho tráfico droga; inklui programa formasaun ba kapasitasaun. UIF konsidera programa ida-ne'e hanesan vantajen adisionál ida tamba fo oportunidade ba formasaun no permiti UIF habelar koperasaun no troka informasaun ho FIU sira seluk ne'ebé involve-an iha programa ida-ne'e.

Hanesan Membru Komité Tékniku, UIF ativu participa iha sorumutu Komité nian, video konferênsia, inklui sorumutu anual iha Lisboa, Portugal ne'ebé monu iha lora 22 -23 Juñu 2016.

**PACED Program** – Other activity that UIF has been engaged in since June 2016 is the Program for the Support of Strengthening Rule of Law of African Portuguese speaking countries and Timor-Leste known as PACED (a Portuguese acronym for “Programa de Apoio à Consolidação do Estado de Direito”).

The program has two separate committees with representatives of Ministry of Justice; Central Banks; Anti-corruption agencies; LEAs and FIUs. PACED which is co-managed by the European Commission and the Camões Institute of Portugal was designed specifically to assist the respective countries in the process of prevention and suppression of corruption; money laundering; and transnational organized crimes primarily related to drug trafficking; including capacity building training programs. UIF finds this program to be an additional advantage as it provides training opportunities also enable UIF to extend its cooperation and information exchange with other FIUs engaged in the program.

As the member of Technical Committee, UIF actively participate meetings, video conference including the first annual meeting in Lisbon, Portugal that took place on 22 - 23 June 2016.





# **Kapítulu** **5** **Chapter**

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## **Dezafiu no Prioridade** **Challenges and** **Priorities**

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## 5.1

# Dezafiu Challenges

Dezafiu balu ne'ebe UIF hasoru durante períodu ne'e, hanesan tuir mai:

a) Tranzasauñ finanseira utiliza osan numeráriu – tranzasaun finanseira barak liu fora hosi sistema finanseiru tanba ekonomia Timor-Leste predominante utiliza osan numeráriu no ida-ne'e laiha dokumentu komprovativu ruma hodi buka tuir fluksu finanseiru. Nu'udar konsekuénsia, tranzasaun hirak-ne'e la konsege deteta iha sistema ABK/KFT.

b) Nível RTS kiik – Instituisaun Finanseira balun seidauk kumpri didi'ak sira nia obrigasaun hodi submete RTS ba UIF. Ida ne'e observa katak sira laiha kuñesimentu apropiadu kona-ba diferénsa entre RTN no RTS, difikuldade iha monitorizasaun tranzasaun kliente, menus kuñesimentu hodi identifika atividade suspeita no menus komitmentu bele mós kontribui ba situaun ida-ne'e.

c) Inezisténsia deklarasaun transporte moeda no TPN – Desde UIF hamrik to'o ohin loron seidauk simu informasaun refere hosi Autoridade Alfandegária. Ida ne'e kontribui ba dezafiu UIF hasoru iha implementasaun funsaun análize.

The major challenges that UIF faced during the year were as follows:

a) Cash-Based Economy - Most financial transactions are conducted outside the financial system because Timor-Leste's economy is predominately cash-based and this leaves no paper trail. As a result, such transactions are not captured in the AML system.

b) Low level of STRs – Some financial institutions were not fully compliant with the obligation to file STRs. It is observed that they have lack of proper understanding of the difference between CTRs and STRs, difficulties in monitoring transactions of their customers, lack of knowledge to identify suspicious activity and lack of commitment might have contributed to this situation.

c) None declaration of cash transportation and BNI – Since the UIF establishment none of this information has been received from the Custom Authority. This contributes to challenges that UIF facing in the implementation of analysis function.



## 5.2

# Prioridade Tinan Tuir Mai Priorities for the Coming Year

Prioridade ba tinan tuir mai, UIF estratejikamente foka ba dezenvolve baze-dadus apropriadu hodi fasilita implementasaun funsaun prinsipál UIF nian; reforssu institusionál; habelar koperasaun nasional no internasionál; no melhora liu-tan programa sensibilizasaun públiku kona-ba ABK/KFT.

Ba períodu 2016 – 2020, UIF sei kontinua implementa planu asaun, partikularmente UIF nia responsabilidade ne'ebé identifika ona iha planu estratéjiku nasional Timor-Leste.

For the coming year, UIF strategically focuses its priorities in developing appropriate database system to facilitate implementation of UIF core functions; institutional strengthening; broaden domestic and international cooperation; and improvement of AML/CFT awareness rising program.

Over the period of 2016 - 2020, UIF will gradually implementing action plans, specifically the UIF areas of responsibility that have been identified in the national strategic plan of Timor-Leste.

## 5.3

# Progresu Planu Estratéjiku Nasionál Timor-Leste 2016 – 2020 “Responsabilidade UIF” Progress of Timor-Leste’s National Strategic Plan 2016 – 2020 “UIF’s Responsibility”

UIF haré katak konkluí avaliasaun risku nasional no dezenvolve planu asaun diak ida no kompreensivu sei la sufisiente. Parte kítiku liu mak tau planu asaun hirak-ne'e iha prátika nune'e bele hamenus fator ameasa no vulnerabilidade ne'ebe identifika ona iha avaliasaun risku nasional Timor-Leste nia.

Tabela tuir mai, apresenta rezumu progresu hosi planu asaun refere, partikulármente área responsabilidade UIF nian, mak determina ona iha Planu Estratéjiku Nasionál 2016 – 2020 konabá ABK/KFT, ne'ebe VI Governu Konstitusional RDTL adopta tiha ona iha loron 14 Juñu 2016.

The UIF is fully aware that completing the national risk assessment and developing a comprehensive action plan is not sufficient. The most critical part is putting into effect such action plan that mitigates the risks and vulnerabilities identified during the first national risk assessment of Timor-Leste.

The table below presents a summary progress of action plans, in accordance with the National Strategic Plan 2016 -2020 for AML/CFT that has been formally endorsed by the VI Constitutional Government of RDTL on 14 June 2016.

	<b>Planu Asaun</b> Action Plans	<b>Progressu</b> Progress Achieved
1	<p>Reforsa programa sensibilizasaun ba instituisaun sira iha setór públiku konabá kestaun ABK/KFT no nia relevánsia ba estabilidade financeira no boa governasaun.</p> <p>To enhance the awareness within government departments and public sector agencies of AML/CFT issues and their relevance to financial stability and good governance.</p>	
2	<p>Hodi introdúz medidas apropriadu hodi supervizona instituisaun não-financeira sira atu kumpri obrigausaun no rekizitu sira ABK/KFT.</p> <p>To introduce appropriate measures for oversight of the DNFBPs' compliance with AML/CFT requirements.</p>	
3	<p>Halo investigasaun paralela ba brankeamentu kapitál relasiona ho produktu krimi subjacente sira.</p> <p>To undertake parallel money laundering investigation in relation to all serious proceeds-generating predicate offences.</p>	
4	<p>Fo atensaun ba konkluzaun ANR no determina oinsa jerálmente aloka rekursu di'ak liu, iha abordajen bazeia ba risku, tur supervizaun ba instituisaun financeira no não-financeira hodi kumpri medida preventiva sira.</p> <p>To study the conclusions of the NRA and determine how best to allocate resources generally, on a risk-based approach, towards the supervision of financial institutions and DNFBPs for compliance with the preventive measures.</p>	
5	<p>Dissemina konkluzaun ANR ba instituisaun financeira no não-financeira hotu-hotu no organiza fórum hodi diskuti implikasaun ba abordajen no aplika medida preventiva.</p> <p>To disseminate the conclusions of the NRA to all financial institutions and DNFBPs, and provide a forum to discuss the implications for their approach to applying the preventive measures, taking proper account of risk.</p>	<p>Dissemina liu hosi:</p> <ul style="list-style-type: none"> <li>• Sorumutu CE banku sira</li> <li>• Sorumutu Responsável Compliance</li> </ul> <p>Disseminated through:</p> <ul style="list-style-type: none"> <li>- Bank's CEOs Forum</li> <li>- Compliance Officers Forum</li> </ul>

<p>6</p>	<p>Promove dezenvolvimentu fórum ida ba Responsável Compliance hodi bele involve-an diretamente ho BCTL, no bele partilla tipolojia no ajuda dezenvolve prátika di'ak instituisaun sira.</p> <p>To promote the development of a forum in which the compliance officers may engage among themselves, and directly with the BCTL, to share typologies and help develop best practices by institutions.</p>	<p>Sorumutu Responsável Compliance estabesele ona iha 2013, hala'o sorumutu iha Novembru 2013 no sei kntinua kada fulan tolu.</p> <p>The COF established in 2013, has been reactivated in November 2016 with quarterly meetings.</p>
<p>7</p>	<p>Involve OTO hodi identifika tanba sa sira la submete RTS, nune'e bele mellora sira nia kuñesimentu ba obrigasaun sira.</p> <p>To engage specifically with the MTOs to identify why they are not filing STRs, and to improve their understanding of their obligations.</p>	<p>UIF kontinua sorumutu no fo formasaun ba OTO 9; foka ba kestaun identifikasaun tranzasaun suspeita.</p> <p>FIU continue organized technical meetings and workshops to 9 MTOs focusing on the STRs identification issues.</p>
<p>8</p>	<p>Knsulta ho instituisaun finanseira no parseiru sira seluk (inklui instituisaun akadémika) hodi identifika sekarak progama eduka no formasaun ba kuadru sira iha medida ABK/KFT, bele kolabora malu hodi dezenvolve.</p> <p>To consult with financial institutions and other stakeholders (including academic institutions) to identify whether a programme to educate and train staff in AML/CFT measures may be developed on a collaborative basis.</p>	
<p>9</p>	<p>Involve setór instituisaun não-finaseira relevante hodi habelar informasaun ABK/KFT, no esplika dezenvolvimentu ba kuadru legal supervizaun ne'ebé apropriadu.</p> <p>To engage with relevant DNFBP sectors to bring awareness of AML/CFT issues, and to explain the development of an appropriate supervisory framework.</p>	
<p>10</p>	<p>Hasae kapasidade UIF, inklui liu hosi aumentu pesoál tékniku, hodi garante katak RTS hotu-hotu analiza lalais; utiliza duni informasaun baze-dadus RTN no deklarasaun transporte moeda, adekuadamente.</p> <p>To increase the capacity of the UIF, including through additional staffing, to ensure that all STRs are analysed promptly, and that appropriate use is made of the CTR and cross border Custom declarations database.</p>	<p>Funsionáriu foun rekruta ona (analista no kooperasaun) no asumi knar iha UIF hosi Julho 2016</p> <p>Two newly recruited staff (an analyst and a cooperation officer) officially assumed duties at FIU since July 2016</p>

11	<p>Dezenvolve sistema baze-dadus própriu hodi armazena informasaun/dadus, jere no fasilita analiza UIF nian ba RTS, RTN no deklarasaun transporte moeda.</p> <p>Develop (or acquire) an appropriate database to hold, manage and facilitate analysis by the UIF of STRs, CTRs and cross border Custom declarations.</p>	<p>Inisia diskusaun ho fornecedor sistema ne'ebé identifika ona.</p> <p>Initiated discussions with the identified system developer</p>
12	<p>Dezenvolve matadalan operasionál apropiadu no prosedimentu internu hodi enkuadra klaru liu knar funsionáriu sira nian iha UIF.</p> <p>Develop appropriate operational manuals and internal procedures to provide a clear framework for staff working within the UIF.</p>	<p>Padraun prosedimentu (SOP) operasionál ba funsaun prinsipál UIF nian dezenvolve no implementa ona iha Dezembru 2016.</p> <p>A comprehensive standard operating procedures (SOP) for UIF core functions developed and implemented since December 2016</p>
13	<p>Fo orientasaun, inklui tipolojia no indikadores BK, ba entidade sujeita sira hodi ajuda halo melloria ba qualidade RTS.</p> <p>Provide guidance, including typologies and red flags, to reporting institutions to help improve the scope and quality of the STRs.</p>	<ul style="list-style-type: none"> <li>• Tipolojia BK no indikadores ba BNCTL no OTO durante formasaun</li> <li>• Dezenvolve indikadores no lista PPE iha prosesu laran</li> <li>• ML typologies and red flags provided to BNCTL and MTOs during workshops.</li> <li>• Development of further red flags and PEP list under process.</li> </ul>
14	<p>Dezenvolve prosedimentu hodi fó komentáriu regulármente ba entidade sujeita sira konabá qualidade no valór STR.</p> <p>Develop procedures to provide regular feedback to reporting institutions on the quality and value of the STRs.</p>	<p>SOP konklui iha Dezembru 2016</p> <p>SOP in place - December 2016</p>
15	<p>Implementa prosedimentu efetivu ba UIF, Autoridade Kompetente no autoridade relevante sira seluk hodi partilla informasaun inteligjénsia no kopera iha prosesu investigasaun ba brankeamentu kapitál, krimi subjacente no finansiametu terorizmu.</p> <p>Implement effective procedures for the UIF, law enforcement and other relevant authorities to share intelligence and to cooperate fully in the course of investigations into money laundering, predicate offences and terrorist financing.</p>	<ul style="list-style-type: none"> <li>• SOP kompleta ho formatu padraun ba koperasaun institucional – Dezembru 2016</li> <li>• Prokuradór sira informadu konabá planu UIF hodi emiti formuláriu padraun hodi implementa koperasaun</li> <li>• SOP complete with standard forms for domestic cooperation in place - December 2016</li> <li>• Prosecutors have been informed on the UIF's plan to issue proper form for implementing cooperation</li> </ul>
16	<p>Dezenvolve prosedimentu apropiadu hodi partilla inteligjénsia no kopera ho UIF estranjeiru.</p> <p>Develop appropriate procedures to share intelligence and to cooperate fully with foreign FIUs.</p>	<p>SOP implementa ona iha Dezembru 2016</p> <p>SOP implemented - December 2016</p>

<p>17</p>	<p>Implementa MOU (mekanizmu koperasaun ne'ebé hanesan) hodi partilla data relevante no inteligjénsia entre autoridade nasional sira ho kompeténsia ba implementa ABK/KFT</p> <p>To implement MOUs (or similar cooperation arrangements) for the sharing of relevant data and intelligence between the domestic authorities tasked with AML/CFT responsibilities.</p>	<ul style="list-style-type: none"> <li>• MOU ho PJR Dezembru 2016</li> <li>• MOU ho Autoridade Kompetente 2 iha prosesu diskusaun</li> </ul> <ul style="list-style-type: none"> <li>• MOU with PPO – December 2016</li> <li>• MOUs with 2 other LEAs under discussion</li> </ul>
<p>18</p>	<p>Negosia MOU (ka mekanizmu seluk ne'ebe hanesan) ho kontrapartida prinsipál hot-hotu iha estranjeiru hodi garante koperasaun pronta no efetiva iha kestaun relasiona ho brankeamentu kapitál no finansiamentu terorizmu.</p> <p>To negotiate MOUs (or similar arrangements) with all key foreign counterparts to help ensure prompt and effective cooperation in matters relating to money laundering and terrorist financing.</p>	<ul style="list-style-type: none"> <li>• MOU ho FIU Portugal – Juñu 2015.</li> <li>• MOU ho UIF estranjeiru 3 iha hela prosesu negosiasaun.</li> </ul> <ul style="list-style-type: none"> <li>• MOU with FIU Portugal – June 2015</li> <li>• MOUs with 3 foreign FIUs under negotiation.</li> </ul>
<p>19</p>	<p>Garante katak ajénsia relevante hotu-hotu indika pessoál responsável ba monitorizasaun no kordenasaun pedidu (tama ka sai) ba koperasaun ho kontrapartida estranjeiru.</p> <p>To ensure that all relevant agencies have a nominated officer who is responsible for monitoring and coordinating requests (both inward and outward) for cooperation with foreign counterparts.</p>	<p>Pessoál koperasasaun rekruta no hahú knar iha 1 Julju 2016, ho responsabilidade primária ba koordenasaun, koperasaun no troka informasaun entre parte sira ne'ebé involve.</p> <p>A cooperation officer in place since July 1st 2016, with primary responsibility on coordination, cooperation and information exchange between parties involved</p>
<p>20</p>	<p>Atua proativamente hodi sai membru ba Grupu Egmont FIU nian.</p> <p>To proactively pursue membership in the Egmont Group of FIUs.</p>	<p>FIU estranjeiru (Portugal no Indonesia) mak fo apoiu ba procesu adezaun ba Egmont Group; kontinua atualiza sira ho informasaun periódika konabá preparasaun kondisaun báziku sira.</p> <p>UIF provides the Egmont Group membership sponsors (Indonesia and Portugal) periodic updated information concerning preparation process of minimum conditions required.</p>

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- Ane | App

21	<p>Promove kampaña publicidade hodi habelar informasaun ba públiku konabá neessidade no importánsia medida preventiva ba ABK/KFT, inklui fó orientasaun konabá rekizitus no prosedimentu ba abertura konta bankária.</p> <p>To conduct regular publicity campaigns to advise the public on why AML/CFT measures are necessary, and to provide guidance on what might be the relevant procedures and requirements for opening a bank account.</p>	
22	<p>Halo melloria ba programa habelar informasaun ba públiku iha rekizitu ba deklarasaun transporte moeda (no konsekuénsia wainhira la deklarara) no título sira ba portadór negosiavel.</p> <p>To improve public awareness of the disclosure requirements (and possible consequences of non-disclosure) in relation to the cross-border transportation of cash and negotiable bearer instruments.</p>	<p>Inisia diskusaun ho autoridade nasionál relevante hodi implemente hamutuk programa habelar informasaun ba públiku (UIF no Oficiais Postu Fronteirisu Integradu).</p> <p>Initiated informal discussion with relevant National Authorities to implement a joint public awareness raising program (UIF and Integrated Border Post Officials)</p>



# Aneksu Appendixes

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## 1

### Formasaun no Partisipasaun iha Eventu Internasionál – 2016 Capacity Building Training Workshop and International Events Participations - 2016

Formasaun Kapasitasaun Atende hosi Funzionáriu UIF Capacity Building Training/Workshop Attended by UIF Staff				
Nú No	Data Date	Asuntu Subject	Organizador Organizer	Fatin Place
1	04 – 08 July	Tékniku analiza; análize ba informasaun finanseira no naun finanseira Analytical Techniques; Analysis for financial and non-financial information	FIU Portugal	Lisbon, Portugal
2	04 – 06 July	Kursu Indusaun Introdusain ba ba funsaun BCTL; kestaun Rekursu Umanu, termu referénsiaba funsionáriu Induction Course Introduction to BCTL functions; HR issues; TOR for BCTL employees	BCTL	BCTL Room Dili, Timor-Leste
3	08 - 15 July	Kombate Terorizmu no Cyber krime Combating Terrorism and Cybercrime	PCIC	PCIC Room Dili, Timor-Leste
4	03 - 07 Oct	Téknika análize finanseira Techniques of Financial Analysis	PPATK	BCTL Room Dili, Timor-Leste

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5	17 Oct – 14 Nov	<p>Formasaun ba formadór (Krimi kona-ba korrupsaun no tráfico droga)</p> <p>Training of trainers (Crimes relating to Corruption and Drug trafficking)</p>	PACED	Judiciary Training Center, Lisbon, Portugal
6	31 Nov – 03 Dec	<p>Joint tipolojia no formasaun kapasitasaun</p> <p>Joint Typologies and Capacity Building Workshop</p>	APG & MENAFATF	Jeddah, Kingdom of Saudi Arabia
7	12 – 14 Dec	<p>Funsaun UIF Informasaun no síkulu intelijénsia Técnika análise finanseira Prosesu analiza</p> <p>Roles and Functions of FIU Information and Intelligence Cycle Techniques of Financial Analysis Analytical Process</p>	UIF and World Bank Group	BCTL Room Dili, Timor-Leste
8	15 – 16 Dec	<p>Medida ABK/KFT (funsaun banku, relasaun prokuradór no UIF; perspetiva internasionál no konsekuénsia BK; técnika investigasaun no analiza</p> <p>AML/CFT Measures (Role of Banks; Prosecutor and FIU Relationship; International Perspective and Consequences of ML; analysis &amp; Investigative Techniques)</p>	UIF & World Bank Group	Novo Tourism Hotel Dili, Timor-Leste

Enkontru no Konferénsia atende hosi Funsionáriu UIF Meetings and Conferences Attended by UIF Staff				
Nú No	Data Date	Reuniaun/Konferénsia Meeting/Conference	Orgnizador Organizer	Lokal Location
1	05 - 08 set	Enkontru anuál ba dala 19 no Fórum TAT 19th APG Annual Meeting and TAT Forum	APG and USA, Treasury Department	San Diego California
2	22 - 23 June	<i>Enkontru PACED</i> <i>PACED Meeting</i>	Instituto de Camoes I.P. & Comissão Europeia	Lisboa, Portugal
3	15 Set 2016	Prevensaun droga iha Timor-Leste Prevention of Drugs in Timor-Leste	Fundação de Cores del Amor	Dili, Timor-Leste
4	20 – 21 Out	Polísia investigasaun kriminal no konsolidasaun lei Criminal Investigation Police and Consolidation Rule of Law	PCIC and PACED	Dili, Timor-Leste
5	18 November 2016	Revizaun ba implementasaun Konvensaun Nasoens Unidas ba anti-korrupsaun Revision of Implementation United Nations Convention of Anti-Corruption	CAC	Dili, Timor-Leste

**ABK/KFT workshop hasa'e konsiénsia hato'o hosi UIF**  
**AML/CFT Awareness Raising Workshop Delivered by UIF**

Nú No	Data Date	Sujeitu Subject	Hato'o ba Delivered To	Fatin Place
1	02 - 10 Aug	<p>Kursu indusaun no sesaun prátika (introdusaun ba UIF, funsaun UIF, enkudramentu legál ABK/KFT; prosesu RTS báziku no análize finanseira)</p> <p>Induction Course and practical sessions (Introduction to UIF; Roles and Functions of FIU; AML/CFT Legal framework; Basic STR process and financial analysis)</p>	Funsionáriu foun UIF	Dili, Timor-Leste
2	12 Oct	<p>Enkuadramentu legál ABK/KFT; funsaun UIF, Obrigasaun entidade sujeita/OTO, BK red flag, téknika identifikaun tranzasaun suspeita</p> <p>AML/CFT Legal framework; Roles and Functions of FIU; Obligation of Reporting Entities/MTO; ML Red Flags Technique of suspicious transaction identification</p>	<p>Jerente no funsionáriu responsável hal relatóriu OTO 9</p> <p>Managers and Reporting Officers of 9 MTOs</p>	Dili, Timor-Leste
3	29 Sep	<p>Enkuadramentu legál ba ABK/KFT/ funsaun UIF, BK red flag, téknika identifikaun tranzasaun suspeita</p> <p>AML/CFT Legal framework; Roles and Functions of FIU; ML Red Flags; Techniques of suspicious transaction identification</p>	<p>Compliance Officer BNCTL; jerente sukursál no funsionáriu Front Office</p> <p>BNCTL Compliance Officers; Branch Managers and Front Office staff</p>	Dili, Timor-Leste

## 2

## Entidade Sujeita tuir Lei ABK/KFT Reporting Entities as Required under AML/CFT Law

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Tipu Entidade Sujeita Type of Reporting Entities			
No	Insitituisaun Finanseira Financial Institutions		
I	Banku Banks	1	CGD/BNU Sukursál Timor-Leste CGD/BNU Timor-Leste Branch
		2	ANZ, Sukursál Timor-Leste ANZ, Timor-Leste Branch
		3	Banco Nacional de Comércio Timor-Leste
		4	PT. Bank Mandiri, Sukursál Timor-Leste PT. Bank Mandiri, Timor-Leste Branch
		5	PT. Bank Rakyat Indonesia, Sukursál Timor-Leste PT. Bank Rakyat Indonesia, Timor-Leste Branch
II	Kompañia Segurus (aplikadu ba sira-ne'ebé faan investimentu liga seguru ba vida) Insurance Company (applicable to those sells investment-linked life policies)		
III	Ajénsia Troka Osan (CEB) Currency Exchange Bureaus (CEB)	1	GlobalEx Limited, Pacific Holdings ( Timor) Ltd
		2	Island Dream Money, Lda
IV	Operadór Transfere Osan (OTO) Money Transfer Operators (MTO)	1	Pacific Holdings, Unipessoal Lda (Western Union)
		2	Sahabat Loro Sa'e, Unipessoal Lda
		3	Island Dream Money, Lda
		4	Msister Motor II Unipeesoal, Lda
		5	Boa Ventura, Unipessoal Lda
		6	Baratu Group, Lda
		7	Istana Group Lda
		8	Foho Osan Mean Group, Unipessoal Lda
		9	Forte Group, Lda
V	Instituisaun Seluk ne'ebé simu Depózitu (OIRD) Other Depository Taking Institution (OIRD)	1	Kaebauk Investimentu no Finansas, SA (KIF)
VI	Instituisaun Naun Finanseira - DNFBPs Non-Financial Institutions – DNFBPs (Kazino; advogadu, Kontabilista; Fiskál; Auditór, Negosiante pedra presioza & Metál; Ajénsia Imobiliáriu no Koretór) (Casinos; Lawyers; Accountants; Fiscal; Auditors; Dealers in precious stones & metals; Real State Agencies & Brokers)		

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## 3

## Membru CNCBC Members of CNCBC

Nú. No.	Rezolusaun Governu nu. 10/2014 9 Abril Government Resolution no. 10/2014 of 9 April	Kompozisaun Foun Tuir Alteraun Nu. 18/2016, 29 Juñu New composition under amended Resolution no.18/2016 of 29 June	Pozisaun Position
1	Ministru Juitisa Minister of Justice	Ministru Juitisa Minister of Justice	Ko-Prezidente Co-Chair
2	Ministru Negósiu Estranjeiru no Koopersaun Minister of Foreign Affairs & Cooperation	Ministru Negosiu Estranjeiru no Koopersaun Minister of Foreign Affairs & Cooperation	Ko-Prezidente Co-Chair
3	Ministra Finansas Minister of Finance	Ministra Finansas Minister of Finance	Membru Member
4	Secretariu Estadu Seguransa Secretary State of Security	Ministru Interior Minister of Interior Affairs	Membru Member
5	Prokuradór Jerál Public Prosecutor General	Prokuradór Jerál Prosecutor General	Membru Member
6	Governadór BCTL Governor of BCTL	Governadór BCTL Governor of BCTL	Membru Member
7	Komisáriu Anti-Korrupsaun Commissioner of Anti-Corruption	Komisáriu Anti-Korrupsaun Commissioner of CAC	Membru Member
8	Prezidente Komisaun Funsau Públika President of Public Service Commission	Prezidente Komisaun Funsau Públika President of Public Service Commission	Membru Member
9	Komandante Jerál PNTL General Commander of PNTL	Komandante Jerál PNTL General Commander of PNTL	Membru Member
10	Diretór Jerál Reseita & Alfandega General Director of Revenue & Customs	Diretór Nasionál PCIC National Director of PCIC	Membru Member
11	Diretór Jerál Orsamentu Estadu (x) General Director of State Finance (x)	Diretora-Ezekutiva UIF Executive Director of UIF	Membru Member
12	-	Kordenadór Ezekutivu SERVE Executive Coordinator of SERVE	Membru Member
13	-	Diretór Jerál imigrasaun General Director of Immigration	Membru Member
14	-	Diretór Jerál Reseita General Director of Revenue	Membru Member
15	-	Diretór Jerál Alfandega General Director of Customs	Membru Member

## 4

### Kategoria Infrasaun Subjasenti Designadu Tuir GAFI nia Rekomendasaun Designated Predicate Offence Categories as per FATF Recommendations

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Nú. No.	Kategoria Infrasaun Subjasenti Designadu Designated Predicate Offence Categories	Infrasaun Subjasenti Tuir Lei Nasionál Predicate Offences Covered by National Law
1	Participação em grupo criminoso organizado e extorsão Participation in an organized criminal group and racketeering	Participation in an organized criminal group and racketeering
2	Terrorismo, incluindo financiamento do terrorismo Terrorism, including terrorist financing	Terrorism, including terrorist financing
3	Tráfico de pessoas e contrabando de imigrantes Human trafficking and Smuggling of immigrants	Human trafficking and Smuggling of immigrants
4	Exploração sexual, incluindo a exploração sexual de crianças Sexual exploitation, including sexual exploitation of children	Sexual exploitation, including sexual exploitation of children
5	Tráfico ilegal de estupefacientes e substâncias psicotrópicas Illegal trafficking of narcotic drugs and psychotropic substances	Illegal trafficking of narcotic drugs and psychotropic substances
6	Tráfico ilegal de armas Arms trafficking	arms trafficking
7	Tráfico ilegal de mercadoria roubada ou outra propriedade Trafficking of stolen merchandise or other property	
8	Corrupção e suborno Corruption and bribery	Corruption and bribery
9	Fraude Fraud	Fraud
10	Contrafação de dinheiro Counterfeit money	Counterfeit money
11	Contrafação e pirataria de produtos Counterfeiting and piracy of products	
12	Crimes ambientais Environmental crimes	Environmental crimes

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13	<b>Assassinato e lesões corporais graves</b> Murder, serious bodily injury	Murder, serious bodily injury
14	<b>Rapto, sequestro e tomada de reféns</b> Kidnapping and illegal restraint of freedom and hostage-taking	Kidnapping and illegal restraint of freedom and hostage-taking
15	<b>Extorsão e roubo</b> Robbery or theft	Robbery or theft
16	<b>Contrabando (incluindo alfândegas e impostos especiais e taxas)</b> Contraband (including customs and special taxes and fees)	Contraband (including customs and special taxes and fees)
17	<b>Infrações fiscais, relativos a impostos diretos e indiretos</b> Tax offenses (relating to direct and indirect taxes)	Tax offenses (relating to direct and indirect taxes)
18	<b>Extorsão</b> Extortion	Extortion
19	<b>Contrafação</b> Counterfeiting	Counterfeiting
20	<b>Pirataria</b> Piracy	-
21	<b>Uso indevido de informação confidencial e manipulação de mercado</b> Misuse of confidential or privileged information and market manipulation	-

## 5

## Glossáriu Glossary

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**Brankeamentu Kapitál ka hamuti-osan** – Prosesu ne'ebé krimenozu sira uza osan ka riku-soin ruma ne'ebé obtain hosi rezultadu atividade krimenál, hafoin tenta atu hamuti tiha ka halo brankeamentu hodi hadook, hasubar no halakon osan nia orijin ilísitu hodi hamósu imajen katak osan ne'e mai duni hosi fonte lejítimu ida.

**Finansiamentu Terorizmu** – Aktu krime ida ne'ebé bainhira ema ka grupu ruma disponibiliza fundu, propriedade ka riku-soin ruma ba terorista ka organizasaun terorista, direta ka indiretamente, ho intensaun atu finansia hahalok ka atividade terorizmu nian. Osan ka riku-soin ne'ebé mai hosi fonte lejítimu no mós ilejítimu.

**Prosesu brankeamentu kapitál:**

**Kolokasaun**—konsiste hosi introdusaun riku-soin ka produktu ruma iha sistema finansiamentu no ekonomia, liu hosi instituisaun finanseira sira hanesan banku, ajénsia troka osan (casa de câmbio), kasino sira, nst. Faze ida-ne'e konsisti reestruturasaun, signifika tau osan iha konta bankária barak ho titulár konta ne'ebé hanesan, no smurfing liu hosi ema barak hodi tau osan iha konta bankária ho titulár konta diferenti.

**Kamuflajen** – produktu ilegál ne'ebé obtain ona konverte ka transforma tiha hodi halakon nia orijin liu hosi tranzasaun transferénsia oi-oin no halo dala barak, involve mós titular konta bankária barak hodi kria konfuzsaun para difikulta identifikasaun no buka tur orijin lolós hodi hamósu hanesan osan lejítimu.

**Integrasaun** – osan ka fundus ne'ebé hamuti ona investe fali iha tipu atividade ekonómika lísitu sira, ezemplu hanesan sosa riku-soin ne'ebé luxu, halo investimentu boot ruma, nst.

**Money Laundering** is a process used by criminals where the origins of money or assets generated as a result of criminal activity, can be concealed, and as a result, the proceeds lose their existing criminal identity and appear to have originated from a legitimate source.

**Financing of Terrorism** is where funds or other property is made available to terrorist or terrorist organisations, directly or indirectly, with the sole intention that the funds be used to further terrorism. The funds used might from legitimate and/or illegitimate source.

**Money laundering process:**

**Placement** The launderer introduces illegal profits obtained into the financial system and economic using financial institutions (banks, money changers, casinos, etc.). This phase consisted of restructuring (place fund in several accounts or assets of same owner) and smurfing (place fund in several accounts or assets of different owners).

**Layering** the proceeds are converted or moved further from the original source by creating various layers between the sourced of fund and what is intended to achieve and making it appearing more legitimate.

**Integration** The laundered proceeds are ultimately injected into a legitimate economy through purchasing luxury assets/properties, precious metals, etc.

**Predicate Offence** Under the Penal Code of Timor-Leste, a predicate offence is the underlying crime carrying a minimum sentence of over 2 years imprisonment, which generates the money to be laundered. The predicate offence is one of the material elements of money laundering offence, for example, authorities cannot punish an individual for laundering the proceeds of a tax evasion if it is not defined as a predicate offence.

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**Infrasaun subjasenti** – kualker krime ho pena prizaun bot liu tinan rua nu'udar fonte hetan osan hafoin hamutin tiha ka halo brankeamentu kapitál. Infrasaun subjasenti ne'e elementu materiál ida ba krime brankeamentu kapitál, ezemplu: autoridade competente sei labele kastigu ema ne'ebé halo brankeamentu kapitál ba vantajen finansiamentu ruma hetan hosi aktu hases-an hosi obrigasaun selu impostu (evazaun fiskal) bainhira aktu ilísitu ida ne'e la defini nu'udar infrasaun subjasenti ida.

**Produitu Krime** – Signifika fundus ka propriedade ne'ebe mak hetan direta ka indireta liu hosi infrasaun subjasenti sira. Ida ne'e inklui mos benefisiu ka rendimentu ne'ebé mai hosi infrasaun hirak ne'e, produitu krime mai hosi invetimentu fundus, ka fundus no propriedade ne'ebe transfere ona ba tipu propriedade seluk, sorin deit ou tomak.

**Tranzasau Suspeita** – tanzasau finanseira ida konsidera suspeita wainhira nia aparénsia estrañu no laiha justifikasaun ekonómika, no wainhira entidade sujeita sira iha razaun forte hodi konklui katak tranzasau refere involve brakeamentu kapital, finansiamentu terorizmu ka produitu krimehosi atividade ilegal ruma.

**Pessoa Políticamente Exposta** – Pessoa natural (individu) ne'ebé assumi kargu boot ruma ho natureza polítika ka públika, durante tinan ida, inklui sira nia membru família rasik, ka individu koñesidu ho iha relasaun komersiál ho sira hanesan defini ona iha artigo 1 hosi Lei ABK/KFT.

**Entidade Sujeita** – intituisaun finanseira no intituisaun naun-financeira tuir artigo 3 Lei nu. 17/2011

**Proceeds of crime** means any funds or property derived from or obtained directly or indirectly through the commission of a predicate offence. This also includes income or benefits derived from such proceeds, proceeds obtained from the investment of such funds or the funds or property that have been transferred into other types of assets, whether partially or in whole.

**Suspicious Transaction** A transaction is considered suspicious when it appears unusual and has no clear economic purpose and when a reporting entity has reasonable grounds to suspect that it involves money laundering terrorist financing or any proceeds from unlawful activity.

**Politically Exposed Person** Natural persons who are or have been entrusted until one year ago with prominent political or public function, as well as their close family members and person known to have close corporate or commercial relationships with them, as defined in the article 1 of AML/CFT Law.

**Reporting Entities** are those financial and non-financial institutions established in the article 3 of AML/CFT Law no.17/2011.





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