

THE REPUBLIC OF THE UNION OF MYANMAR

Anti-Money Laundering Central Body

THE NATIONAL STRATEGY ON ANTI-MONEY LAUNDERING AND COUNTERING THE FINANCING OF TERRORISM

(2019-2023)

Restricted

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"Towards the secure Economic Regime."							
National Strategy on Anti-Money Laundering and Countering the Financing of Terrorism							
(2019–2023)							
(Published by the approval of Cabinet Meeting No. 10/2019 held by the Government of the Republic of the Union of Myanmar							

on 23 May, 2019)

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Foreword of the Chairman of the Anti-Money Laundering Central Body

Amidst the threats occurring in countries in the world, transnational organized crimes such as drugs trafficking, human trafficking and terrorism are major problems. However, money laundering moved up the front line since offenders are inevitably applying it to commit the crimes and reuse the proceeds of crime as official ones.

Money Laundering means converting or transferring of money and property (dirty money) for the purpose of disguising or concealing its source, title, locality or form to evade the legal action and to be recognized as the legitimate incomes (white money).

According to IMF's report in 1998, the estimate amount of money laundered globally in one year is 2–5% of global GDP, or \$ 800 billion – \$ 2 trillion in current US dollars.

According to estimate from the 2009 report of United Nations Office on Drugs and Crime (UNODC), 3.6 percent or US\$ 2.1 trillion of Global GDP was proceeds of other crimes except tax evasion, and 2.7 percent (US\$ 1.6 trillion) of Global GDP was laundered. 1.5 percent of Global GDP was proceeds obtained from Drug—trafficking, forgery, human-trafficking and arms smuggling which are transnational organized crimes and 70 percent of that amount was laundered by using banks and financial institutions. They also estimated that law enforcement agencies could seize and frozen only less than 1 percent of Global illicit financial flows.

There would cause instability of economy and inflation as perpetrators could enter into internal and international formal markets with the capital obtained from crimes, the destruction of social and cultural sectors because of their entering into illicit markets, and the loss of prestige of the country by jeopardizing administration, judicial, education and health sectors. Moreover, there may cause a deterrent of foreign capital investment.

When looking back to the improvement of legal framework, Myanmar ratified the United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances (Vienna) in 1991, accordingly, it enacted to take action on money laundering related crimes in the Narcotic Drugs and Psychotropic Substances Law, 1993.

Besides, Myanmar acceded to the United Nations Convention against Transnational Organized Crime – UNCTOC in 2004 and the United Nations Convention against Corruption – UNCAC in 2012, accordingly, the Anti-Money Laundering Law and the Anti-Corruption Law were enacted. Similarly, Myanmar ratified 13 out of 19 protocols of the United Nations Convention against Terrorism and as a result, the Counter Terrorism Law was enacted in 2014. Regarding combating the financing of terrorism, Myanmar ratified International Convention for the Suppression of the Financing of Terrorism on 2016 and promulgated the Counter Terrorism Law on 4th June, 2014 and the Counter Financing of Terrorism Rules on 11th September, 2015 respectively.

When formulation and implementation of a national strategy effectively for combating money laundering, financing of terrorism and financing of proliferation of weapons of mass destruction was required, the national strategy (2019–2023) was prepared in line with international standards in cooperation with the relevant domestic agencies.

Myanmar had its dedicated commitment to combat money laundering, financing of terrorism and financing of proliferation of weapons of mass destruction according to the Conventions and its domestic legislations, therefore, such designated national strategy will be achieved by enhancing cooperation among its government agencies and private sectors.

Chairman

Anti-Money Laundering Central Body

Remarks by the Chairman of the National Strategy Drafting Committee on AML/CFT

In order to strengthen Anti-Money Laundering and Countering Financing of Terrorism-AML/CFT Regime, the Anti-Money Laundering Central Body-AMLCB prepared a national strategy on AML/CFT to implement within five years (2019 – 2023) with the approval of the Union Government.

The national strategy was drawn up based on the consultation with government agencies and private sectors from AML/CFT field, technical assistance of International Monetary Funds-IMF, findings from mutual evaluation process of Asia-Pacific Group on Money Laundering- APG and findings from national risk assessment process.

The national strategy consists of legal framework, capacity building, supervisory resources and cooperation among Law Enforcement Agencies – LEA, Financial Intelligence Unit, Reporting Organizations, Competent Authorities and Border Management. In this context, it is particularly required to accomplish the sector-based action plan formulated under the national strategic objectives within the designated time frame.

In conclusion, the national strategy on AML/CFT has been materializing in cooperation with government agencies and private sectors.

Chairman

National Strategy Drafting Committee

National Strategy on Anti-Money Laundering and Countering the Financing of Terrorism

2019-2023

Introduction

- 1. Money Laundering and Financing of Terrorism causes the threats across the world such as threatening public security, public unrest and widening of gap between the rich and the poor, etc. Generally, sources of money uses in money laundering were obtained by committing other crimes including human-trafficking, human-smuggling, drug—trafficking, arms-smuggling, corruption, bribery, fraud, kidnapping, illicit trade, environmental crime impacts and other crimes. Laundering the money obtained by committing those crime and financing of terrorism, terrorists and terrorist groups by those proceeds cause the threats to the country's economy and public security.
- 2. In the last 30 years, money laundering and financing of terrorism have been spreading with the rapid development of financial sectors. Terrorists use banks and financial institutions to transfer and convert their proceeds of crimes and finance for terrorism rapidly from one place to another by exploiting emerging financial system of developing countries.
- 3. Myanmar is a developing country situated in South East Asia abuts to China and Laos in East, Thailand in South East and South, Bangladesh in West and India in North West. Since 2010, Myanmar has been conducting democratic transition that attracts foreign investments and foreign banks and paves the way for its economic development. On the other hand, Myanmar recognized potential risks such as money laundering, financing of terrorism and financing of proliferation of weapons of mass destruction arising with its open-economy and emerging financial system,

- 4. Therefore, Myanmar has been trying hard and will continue with all its might and main to combat money laundering, financing of terrorism and financing of proliferation of weapons of mass destruction so as to ensure public security, prevention of public unrests, protection of human dignity, the country's economic development and reduction of disparity between the rich and the poor.
- 5. In this way, an important objective "to strengthen country's financial system to enable countering of money laundering and financing of terrorism and other unlawful conducts, etc." as mentioned in Strategy 3.5.7 of Pillar No.(2) under Myanmar Sustainable Development Plan will also be fulfilled. Furthermore, according to the national strategy on AML/CFT, the relevant legal, institutional, preventative and combative framework will be more strengthened and local/international cooperation will be enhanced.

AML/CFT Regime

- 6. Myanmar became a member of the United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances (Vienna Convention) in 1991. In that context, Myanmar criminalized the concealing, converting and obliterating proceeds obtained from trafficking of narcotic drugs. Furthermore, 31 predicate offences were included in the Control of Money Laundering Law enacted on 17th June, 2002 as the offences thereof, and transferring, converting, concealing and obliterating proceeds obtained by committing those offences were taken action. Regardless of whatever threshold amount involved in money laundering, such conduct shall be taken into action by the control of Money Laundering Law for the fact that money and properties obtained by illicit means were converted to legal ones.
- 7. Under Section 6 of the Control of Money Laundering Law– CMLL, the Union Government formed and empowered the Central Control Board on Money Laundering on 4th July, 2002 to enable to make policies related to money and properties obtained by illicit means, take action by coordinating with the relevant government agencies and organizations in line with these policies, supervise and guide on taking action legally and collaborate with United Nations Convention members, international organizations, regional groups

and neighboring countries. This Board formed Financial Intelligence Unit-FIU by the order No. 3/ 2004 on 16th January, 2004, and made it responsible to combating money laundering operations, with the establishment of AML/CFT regime.

- 8. After that, CML law, 2002 was repealed and a new Anti Money Laundering Law was enacted on 14th March, 2014 to be Law in line with the international standards and accordingly, AMLCB and FIU was restructured.
- 9. After ratifying International Convention for the Suppression of the Financing of Terrorism on 16th August, 2006 as a member, Myanmar enacted the Counter Terrorism Law on 4th June, 2014 and the Countering Financing of Terrorism Rules on 11th September, 2015, established a CFT Regime by forming the Central Committee for Counter Terrorism and the Working Committee on Countering Financing of Terrorism Offences to take action on CFT offences and related matters.
- 10. The following laws are being used in AML/CFT operations of Myanmar:
 - (a) The Control of Money Laundering Law (2002) and Rules (2003);
 - (b) The Anti-Money Laundering Law (2014) and Rules (2015);
 - (c) The Counter Terrorism Law (2014);
 - (d) The Countering Financing of Terrorism Rules (2015);
 - (e) The Narcotic Drugs and Psychotropic Substances Law (1993) and Rules (1995);
 - (f) The Mutual Legal Assistance in Criminal Matters Law (2004) and Rules (2005);
 - (g) The Extradition Law (2017).

National Risk Assessment on Money Laundering and Financing of Terrorism

11. AMLCB formed the National Risk Assessment Committee on ML/TF on 30th December, 2015 to conduct national risk assessment in money laundering and financing of terrorism fields under section 7(c), chapter 4 of AML Law, 2014.

- 12. The Committee introduced national risk assessment process with technical assistance of International Monetary Funds-IMF in December, 2015. The Committee implemented eight phrases process by using the IMF Fund Staff's Assessment Methodology. According to IMF's methodology, not only potential threats and vulnerabilities but also current control measures on ML/TF were identified, analyzed, evaluated and prioritized to understand its likelihood level, possible consequences and rating of each risk.
- 13. According to national risk assessment results, ML/TF Risk rating of Myanmar was "Higher".

Risk Matrix Extremely higher Extremely Higher Risk Much higher Much Higher Risk Higher Higher Risk Higher medium Higher Medium Risk Lower medium Lower Medium Risk Lower Lower Risk Much lower Much Lower Risk Negligible Very Minor Minor Moderate Major Very Major Huge or Likelihood level 1 Severe Consequence Level→

- 14. In the national risk assessment, Proceeds of Crime POC was identified as potential threats related to money laundering. In the assessment, POC were largely identified from tax & excise evasion, environmental crime, and corruption and bribery and second largely from illicit trafficking of narcotic drugs and psychotropic substances, forgery and piracy.
- 15. In the assessment, it was identified that the main sectors falling into the category of net risk on money laundering were banking sectors, legal person-LP, Designated Non-Financial Business and Professions-DNFBP, Money Services Businesses-MSB.
- 16. There was also identified that the main sectors falling into the category of high risk on counter financing of terrorism are banks, MSB and DNFBPs.
- 17. NRA Report was issued by approval of the Cabinet Meeting No. 12/2018 of the Union Government held on 12th July, 2018, and then it has been posted on Financial Intelligence Unit–FIU Website, www.mfiu.gov.mm, in the link, https://mfiu.gov.mm/nra-executive-summary-report.
- 18. The strategic action plans under the national strategy also describes to conduct risk-based approach for mitigating risks, based on findings from mutual evaluation report and results from national risk assessment.

Vision

19. To protect the State and its people, organizations, business enterprises and global society from criminals and terrorists by preventing, detecting and suppressing money laundering and its predicate offences, terrorism and financing of terrorism effectively and collaboratively in line with international standards.

Mission

20. The main mission under the national strategy is to improve sectorial regulatory, qualified financial intelligence reports, operational capacity of Law Enforcement Agencies–LEA, including internal and international collaborations to develop criminal justice system for effective determent, identification and combatting of internal and international money laundering, terrorism and financing of terrorism.

Objectives

- 21. The objectives are as follows:
 - (a) to ensure strengthening of legal framework;
 - (b) to ensure strengthening of institutional framework;
 - (c) to conduct determent and suppression effectively;
 - (d) to enhance preventive measures;
 - (e) to emerge effective criminal justice system;
 - (f) to enhance internal and international collaboration;
 - (g) to improve cooperation of relevant sectors by enhancing awareness raising;
 - (h) to provide necessary resources.

AML/ CFT Strategic Areas

- 22. The following five strategic areas will be implemented to accomplish the strategic objectives of the national strategy on AML/CFT:
 - (a) **Strategic Area I** Strengthening policies, instructions and legal frameworks on money laundering, terrorism and terrorist financing in line with international standards based on the identified risks.

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- (b) Strategic Area II Conducting functions of FIU more effectively
- (c) Strategic Area III- Implementing more effectively on AML/CFT preventive measures on banks and financial institutions and DNFBPs
- (d) Strategic Area IV- Capacity development in investigation, prosecution and conviction of LEAs, prosecuting bodies and judicial authorities with respect to confiscation of Proceeds obtained from committing ML, its predicate offences and TF
- (e) Strategic Area V Enhancing internal and international cooperation on AML/CFT

Strategic Area I

Strengthening policies, instructions and legal frameworks on money laundering, terrorism and terrorist financing in line with international standards based on the identified risks

Challenges

23. It is required to amend the definitions, core and key functions of FIU, and there is a need to entrust the special investigative powers in the Anti-Money Laundering Law so as to enable search, seizure, investigation and confiscation of POCs effectively. Moreover, there is a need to review the legal frameworks of relevant LEAs working on the offences related to money laundering to be able to detect ML/TF more. It is also required to improve and strengthen the mandates, mechanisms, instructions and policies of the competent authorities who will supervise reporting organizations.

Strategic Objectives 1.1

- 24. Amendment of AML Law and Rules in line with international standards
 - (a) Strategic Initiative 1.1.1: Reviewing and amending AML Law in line with FATF's recommendations, mutual evaluation report and national risk assessment report
 - (b) Strategic Initiative 1.1.2: Reviewing and amending the Anti-Money Laundering Rules.

Strategic Objectives 1.2

- 25. To strengthen legal frameworks of LEAs to effectively conduct AML/CFT and seize the POCs.
 - (a) Strategic Initiative 1.2.1: Amending the Anti-Corruption Law in line with United Nation Convention Against Corruption–UNCAC
 - (b) Strategic Initiative 1.2.2: Amending the Anti-Corruption Rules
 - (c) Strategic Initiative 1.2.3: Enacting the Forest Rules
 - (d) Strategic Initiative 1.2.4: Enacting the Protection of Wildlife and Protected Areas Rules
 - (e) Strategic Initiative 1.2.5: Enacting Tax Administration law
 - (f) Strategic Initiative 1.2.6: Enacting Taxpayer Compliance Improvement Strategy
 - (g) Strategic Initiative 1.2.7: Enacting new Income-Tax Law
 - (h) Strategic Initiative 1.2.8: Reviewing and amending customs procedures
 - (i) Strategic Initiative 1.2.9: Reviewing and amending the Gambling Law

- (j) Strategic Initiative 1.2.10: Preparing and launching of code of conduct by government agencies and private entities on voluntary basis
- (k) Strategic Initiative 1.2.11: Laying down the strategic framework on combating narcotic drugs and psychotropic substances
- (I) Strategic Initiative 1.2.12: Amending the Narcotic Drugs and Psychotropic Substances Rules
- (m) Strategic Initiative 1.2.13: Amending the Anti-Trafficking in Person Law

Strategic Objectives 1.3

- 26. Strengthening ML/TF Legal Frameworks
 - (a) Strategic Initiative 1.3.1: Reviewing and amending the Counter Terrorism Law
 - (b) Strategic Initiative 1.3.2: Enacting the Counter Terrorism Rules
 - (c) Strategic Initiative 1.3.3: Amending Registration of Organizations Law (2014).

Strategic Objectives 1.4

- 27. Strengthening internal and international cooperative legal frameworks
 - (a) Strategic Initiative 1.4.1: Laying down policies and procedures by competent authorities so as to enable allocation of responsibilities such as coordination, collaboration and information exchange, etc. on AML/CFT supervision with relevant internal/international counterpart organizations.
 - (b) Strategic Initiative 1.4.2: Reviewing weakness and deficiencies identified in Mutual Evaluation Report and amending the Mutual Legal Assistance in Criminal Matters Law if necessary.

(c) Strategic Initiative 1.4.3: Issuing policies, instructions and procedures for expeditiously performing mutual legal assistance in criminal matters.

Strategic Objectives 1.5:

- 28. Strengthening Customer Due Diligence-CDD, monitoring and AML/CFT procedures of reporting entities
 - (a) Strategic Initiative 1.5.1: Designating DNFBPs as reporting organizations by issuing order that requires their responsibilities to report FIU and AML/CFT obligations.
 - (b) Strategic Initiative 1.5.2: Issuing CDD guidelines related to high risk countries.
 - (c) Strategic Initiative 1.5.3: Reviewing and amending AML/CFT monitoring procedure for transactions and accounts of customers.
 - (d) Strategic Initiative 1.5.4: Issuing guideline which contains detail descriptions and practical steps for respective sector in performing customer due diligence directive.

Strategic Objectives 1.6

- 29. Strengthening AML/CFT regulatory frameworks to be practiced on reporting entities
 - (a) Strategic Initiative 1.6.1: Assigning competent authorities for all reporting entities
 - (b) Strategic Initiative 1.6.2: Developing AML/CFT coordination policy for competent authorities.
 - (c) Strategic Initiative 1.6.3: Developing Risk-Based Supervision-RBS Manual on AML/CFT on the basis of different working natures of competent authorities
 - (d) Strategic Initiative 1.6.4: Amending the Microfinance Institutions Law (2011)
 - (e) Strategic Initiative 1.6.5: Amending the Insurance Business Law (1996)

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(f) Strategic Initiative 1.6.6: Enacting the new Money Lenders Law

(g) Strategic Initiative 1.6.7: Issuing Law/ Orders related to Casinos Business

(h) Strategic Initiative 1.6.8: Including supervisory provisions in the Real Estate Law in line with AML/CFT standards

(i) Strategic Initiative 1.6.9: Reviewing and amending the Myanmar Gemstone Law

(j) Strategic Initiative 1.6.10: Amending the laws periodically to strengthen control of banks and financial institutions

Strategic Objectives 1.7

30. Enhancing transparency of beneficial ownership information related to legal persons and legal arrangements.

(a) Strategic Initiative 1.7.1: Issuing directives and guidance of identifying, verifying, keeping and informing the beneficial ownership's information

Strategic Initiative 1.8

31. To monitor and examine the money laundering and terrorist financing related transaction by developing financial inclusion;

(a) Strategic Initiative 1.8.1: Preparing regulatory frameworks and issuing directives to prescribe threshold limit that requires use of banking system service for amount exceeding the threshold limit.

Strategic Initiative 1.9

- 32. To raise awareness of ML/TF risks among competent authorities and reporting entities
 - (a) Strategic Initiative 1.9.1: Taking measures to raise national risks awareness among the relevant agencies.
 - (b) Strategic Initiative 1.9.2: Conducting national risk assessments every five years for update.
 - (c) Strategic Initiative 1.9.3: Taking measures to disseminate national risk assessment results timely.

Strategic Objectives 1.10

- 33. Mitigating ML/TF risks arising from informal remittances
 - (a) Strategic Initiative 1.10.1: Taking control measures such as issuing business licenses in line with directives and procedures, and systematic regulating to eliminate informal remittances.

Strategic Area II

Conducting functions of FIU more effectively

Challenges

34. In accordance with NRA results, FIU is weak in areas such as analysis of the received reports, dissemination of findings, numbers of experts, IT resources and professional trainings. FIU may not disseminate qualified analysis results because of a few numbers and low quality of the received Suspicious Transaction Reports–STR. Therefore, FIU needs to establish a cooperation mechanism to discuss with and receive the qualified reports from regulatory authorities and reporting entities.

Strategic Objective 2.1

- 35. To form FIU as a modern and capable organization
 - (a) Strategic Initiative 2.1.1: Taking measures to restructure and reform FIU systematically.
 - (b) Strategic Initiative 2.1.2: Taking measures to recruit qualified staffs according to FIU's set-up.

Strategic Objective 2.2

- 36. To improve reports receiving system in FIU and quality of STR reports by reporting entities
 - (a) Strategic Initiative 2.2.1: Issuing directives and coordinating with reporting organizations and government agencies to be more convenient when requesting information for analysis.
 - (b) Strategic Initiative 2.2.2: Reviewing existing data-based system of FIU and making necessary upgrade of it.
 - (c) Strategic Initiative 2.2.3: Educating reporting entities to complete the specified reporting formats.

Strategic Objective 2.3

- 37. To improve receiving of reports and analysis by FIU
 - (a) Strategic Initiative 2.3.1: Providing trainings on operational and strategic analysis of reports to the assigned staffs.
 - (b) Strategic Initiative 2.3.2: Implementing and occasionally reviewing analysis procedures in line with the Standard Operating Procedure (SOP).
 - (c) Strategic Initiative 2.3.3: Founding resources to enable electronic analysis.

Strategic Objective 2.4

- 38. To improve dissemination of analysis results
 - (a) Strategic Initiative 2.4.1: Systematically disseminated report analysis results to the relevant agencies.
 - (b) Strategic Initiative 2.4.2: Coordinating and regulating reporting entities to send their feedback related to quality of report.

Strategic Objective 2.5

- 39. To enhance information sharing and collaboration
 - (a) Strategic Initiative 2.5.1: Assigning contact persons and conducting regular communications.
 - (b) Strategic Initiative 2.5.2: Issuing directives to complete and send the reporting template to competent authorities.
 - (c) Strategic Initiative 2.5.3: Coordinating among FIU, competent Authority and reporting organizations to meet at least once in every three months and discuss about qualified reports.
 - (d) Strategic Initiative 2.5.4: Setting operational system to use Data-Based System and other modern IT equipment.
 - (e) Strategic Initiative 2.5.5: Enhancing cooperation by signing MoUs between MFIU and international counterpart agencies, and also between MFIU and international FIUs.

Strategic Objective 2.6

- 40. AML/CFT awareness arising among the relevant agencies so as to enable FIU to implement its functions effectively
 - (a) Strategic Initiative 2.6.1: Taking measures to raise AML/CFT awareness in competent authorities.
 - (b) Strategic Initiative 2.6.2: Taking measures to raise AML/CFT awareness in reporting organizations.
 - (c) Strategic Initiative 2.6.3: Taking measures to raise AML/CFT awareness in law enforcement agencies.

Strategic Area III

Implementing more effectively on AML/CFT preventive measures on banks and financial institutions and DNFBPs

Challenges

41. There are weaknesses in Customer Due Diligence–CDD, weakness in collecting Beneficial Ownership's information and keeping records, weakness in identification, verification and onsite visit on ML/TF due to inadequate and ineffective STRs, weakness in making regulation, supervising and monitoring foreign branches and subsidiaries. Moreover, there is also needed to keep the sectorial risk assessments in relevant sectors so as to enable promulgation of risk based polices and directives.

Strategic Objective 3.1

- 42. To strengthen AML/CFT related STRs of reporting organizations
 - (a) Strategic Initiative 3.1.1: Managing reporting process timely.
 - (b) Strategic Initiative 3.1.2: Taking measures to share skill and knowledge of reporting system.
 - (c) Strategic Initiative 3.1.3: Forming the institution of Compliance Officers to contact directly the Responsible Agencies.
 - (d) Strategic Initiative 3.1.4: Enhancing cross-border cash courier reports to FIU.

Strategic Objective 3.2

- 43. To improve compliance of Customer Due Diligence and collection of Beneficial Ownership's (BO) information of reporting entities
 - (a) Strategic Initiative 3.2.1: Enhancing the duties and powers.

- (b) Strategic Initiative 3.2.2: Conducting AML/CFT awareness raising to improve CDD and collection of BO information effectively
- (c) Strategic Initiative 3.2.3: Enhancing effective administrative actions or criminal actions for failure to comply CDD process
- (d) Strategic Initiative 3.2.4: Enhancing identification, verification and record keeping to collect Beneficial Ownership's information
- (e) Strategic Initiative 3.2.5: Enhancing training and awareness raising on collection and identification of BO information.

Strategic Objective 3.3

- 44. To improve monitoring transactions and records keeping systems of reporting entities
 - (a) Strategic Initiative 3.3.1: Formulating AML/CFT procedures to monitor transactions and accounts of customers.
 - (b) Strategic Initiative 3.3.2: Providing skill trainings on CDD, EDD, STR Red Flag Indicator Typologies.
 - (c) Strategic Initiative 3.3.3: Enhancing use of modern technologies to monitor transactions of customers.
 - (d) Strategic Initiative 3.3.4: Establishing Date-Based System to improve records keeping system.

Strategic Objective 3.4

- 45. To ensure consistency of ML/TF preventive measures and NRA results
 - (a) Strategic Initiative 3.4.1: Conducting ML/TF risk assessments in the relevant sectors, particularly baseline condition assessments before using technology, devices and services, and requesting technical assistance if necessary.
 - (b) Strategic Initiative 3.4.2: Providing technology knowledge on conducting ML/TF risk assessment for every single sector.

(c) Strategic Initiative 3.4.3: Taking measures to manage risks based on sectorial risk assessment results.

Strategic Objective 3.5

- 46. To strengthen regulatory measures on reporting entities by use of risk-based approach
 - (a) Strategic Initiative 3.5.1: Taking measures to regulate and enhance reporting and CDD process.
 - (b) Strategic Initiative 3.5.2: Laying down AML/CFT internal policies and procedures in the relevant sectors.
 - (c) Strategic Initiative 3.5.3: Scrutinizing, regulating and taking actions on incompliances according to AML/CFT internal policy.
 - (d) Strategic Initiative 3.5.4: Laying down procedures, manuals and plans to regulate on-site inspection & off-site monitoring; keeping coordination and information sharing systems in place between those on-site and off-site inspections.
 - (e) Strategic Initiative 3.5.5: Taking measures to develop capacity of AML/CFT related On-site Inspection Groups.
 - (f) Strategic Initiative 3.5.6: Taking measures to appoint more On-site Inspection experts.
 - (g) Strategic Initiative 3.5.7: Reviewing and updating AML/CFT procedures and directives for foreign subsidiaries and correspondents.
 - (h) Strategic Initiative 3.5.8: Taking measures to monitor operations of foreign subsidiaries and correspondents.
 - (i) Strategic Initiative 3.5.9: Making risk based inspection manuals, typologies and arrangements to inspect the sectorial AML/CFT regulatory and inspections of regulatory authorities of banks and financial institutions.
 - (j) Strategic Initiative 3.5.10: Making risk based inspection manuals, typologies and arrangements to inspect the sectorial AML/CFT regulatory and inspections of regulatory authorities of DNFBPs.

Strategic Objective 3.6

- 47. To ensure staffs of banks, financial institutions and DNFBPs fulfill their AML/CFT obligations with high capacity and free of corruption
 - (a) Strategic Initiative 3.6.1: Developing AML/CFT criteria for appointing of staffs.
 - (b) Strategic Initiative 3.6.2: Taking measures to implement after establishment of Code of Conduct.
 - (c) Strategic Initiative 3.6.3: Taking measures to culture the high morality.
 - (d) Strategic Initiative 3.6.4: Taking measures to educate and take action on corruption.

Strategic Area IV

Capacity development in investigation, prosecution and conviction of LEAs, prosecuting bodies and juridical authorities with respect to confiscation of Proceeds obtained from committing ML, its predicate offences and TF

Challenges

48. In accordance with NRA results, it was identified that POCs from tax & excise evasion, environmental crimes, bribery, corruption and illicit trafficking in narcotic drugs and psychotropic substances were mostly laundered. It is necessary to support adequate authority, expertise and resources to accomplish identifying, investigating, prosecuting, convicting and confiscating illicit assets related to money laundering and financing of terrorism. Furthermore, AML/CFT resources, knowledge and trainings for monitoring cross-border transport of persons and properties are necessary.

Strategic Objective 4.1

- 49. To effectively implement investigation, prosecution and conviction on AML/CFT
 - (a) Strategic Initiative 4.1.1: Taking measures to provide financial investigation trainings to LEAs so as to perform it in parallel with investigation on money laundering offences.
 - (b) Strategic Initiative 4.1.2: Issuing directives and regulating so as to perform financial investigation in parallel with investigation on money laundering offences.
 - (c) Strategic Initiative 4.1.3: Taking measures to lecture financial investigation as a compulsory subject at training schools of LEAs.
 - (d) Strategic Initiative 4.1.4: Taking measures to send LEA staffs to trainings in abroad for capacity building on AML/CFT.
 - (e) Strategic Initiative 4.1.5: Taking measures to send investigators on secondment to foreign LEAs to enhance AML/CFT international experiences.
 - (f) Strategic Initiative 4.1.6: Taking measures to determine whether or not LEA officers serving at present have necessary capacity to attend AML/CFT courses, or whether or not it is necessary to appoint additional qualified staffs.
 - (g) Strategic Initiative 4.1.7: Taking measures for AML/CFT awareness rising to prosecution and conviction authorities.
 - (h) Strategic Initiative 4.1.8: Taking hierarchical supervisory measures to gather strong evidences during case building.
 - (i) Strategic Initiative 4.1.9: Designating departments/ agencies as necessary to perform ML/TF investigation.
 - (j) Strategic Initiative 4.1.10: Appointing contact persons to exchange information with FIU.

- (k) Strategic Initiative 4.1.11: Taking measures to provide necessary equipment and trainings in order to perform special investigative techniques.
- (l) Strategic Initiative 4.1.12: Conducting to get necessary budget for ML/TF investigations.

Strategic Objective 4.2

- 50. To ensure freezing, seizing and confiscating illicit possessions effectively with respect to ML/TF
 - (a) Strategic Initiative 4.2.1: Setting down policies and procedures to coordinate between relevant departments for freezing, seizing and confiscating of illegal assets.
 - (b) Strategic Initiative 4.2.2: Taking measures to enhance recovery of assets with international cooperation in accordance with Mutual Assistance in Criminal Matters Law.
 - (c) Strategic Initiative 4.2.3: Taking measures to provide proficiency courses of assets recovery.
 - (d) Strategic Initiative 4.2.4: Establishing Assets Management System on Seizure.

Strategic Objective 4.3

- 51. To implement AML/CFT activities more effectively in border security and scrutiny operations
 - (a) Strategic Initiative 4.3.1: Taking measures to provide AML/CFT capacity development trainings to agencies serving in border areas.
 - (b) Strategic Initiative 4.3.2: Taking measures to enhance a number of staff and application of modern equipment and Information Technology.

- (c) Strategic Initiative 4.3.3: Taking measures to inspect properties and cash entering through illicit channels by use of permanent checkpoints and special mobile teams.
- (d) Strategic Initiative 4.3.4: Conducting to improve collaboration with customs departments from international or neighboring countries.
- (e) Strategic Initiative 4.3.5: Taking measures to conduct AML/CFT Risk Assessments by each agency performing border management.

Strategic Objective 4.4

- 52. To conduct corruption free AML/CFT activities
 - (a) Strategic Initiative 4.4.1: Taking measures to provide enough salary and subsidies to staffs.
 - (b) Strategic Initiative 4.4.2: Taking welfare arrangements for staffs of relevant law enforcement agencies.
 - (c) Strategic Initiative 4.4.3: Delegation of duties and powers; and taking supervisory measures.
 - (d) Strategic Initiative 4.4.4: Taking preventive measures on anti-corruption.
 - (e) Strategic Initiative 4.4.5: Forming Corruption Prevention Units CPU.

Strategic Objective 4.5

- 53. To mitigate Proceeds of Crime obtained from committing of money laundering and other relevant offences
 - (a) Strategic Initiative 4.5.1: Drawing up and implementing crime reduction strategy.
 - (b) Strategic Initiative 4.5.2: Taking measures to establish Data-Based System for criminal occurrence, prosecution, conviction and confiscation.

Strategic Area V

Enhancing internal and international cooperation on AML/CFT

Challenges

54. It was found that internal and international cooperation for information exchange between FIUs, LEAs and Reporting Organizations was less effective. Additionally, due to low implementation of mutual legal assistance framework in criminal matters and lack of MoUs, there are issues to obtain persons and evidence. There are loopholes in combatting ML/TF because of such delay in implementation of international conventions.

Strategic Objective 5.1

- 55. To improve AML/CFT cooperation among the relevant governmental agencies
 - (a) Strategic Initiative 5.1.1: Developing cooperative procedures and directives between MFIUs and LEAs.
 - (b) Strategic Initiative 5.1.2: Taking measures to raise awareness on financial intelligence exchange of LEAs.
 - (c) Strategic Initiative 5.1.3: Drawing up and disseminating SOPs for information exchange and cooperation.
 - (d) Strategic Initiative 5.1.4: Ensuring transparency of procedures related to Legal Persons-LP and Legal Arrangement-LA; and taking measures to cooperate between DICA and IRD.

Strategic Objective 5.2

- 56. To improve AML/CFT related international cooperation
 - (a) Strategic Initiative 5.2.1: Establishing a mechanism to exchange AML/CFT information by signing bilateral and multilateral agreements to enhance international cooperation.

- (b) Strategic Initiative 5.2.2: Taking measures to coordinate between correspondent banks communicating to foreign countries.
- (c) Strategic Initiative 5.2.3: Taking measures to hold awareness raising workshops and trainings for international cooperation.
- (d) Strategic Initiative 5.2.4: Taking measures to apply Egmont Group of international FIUs.
- (e) Strategic Initiative 5.2.5: Taking measures to enhance international cooperation through informal channel using the INTERPOL and ARIN-AP whereas Myanmar is being a member country.
- (f) Strategic Initiative 5.2.6: Signing MOUs to recover assets located in foreign countries.
- (g) Strategic Initiative 5.2.7: Enhancing bilateral or multilateral agreements with respect to extradition.
- (h) Strategic Initiative 5.2.8: Taking measures to collaborate with Myanmar embassies and consulates in the foreign countries.

Strategic Objective 5.3

- 57. To enhance cross-border cooperation on AML/ CFT
 - (a) Strategic Initiative 5.3.1: Cooperating with neighboring countries to enhance and strengthen self-declaration system which will mitigate risks in use of cross-border cash couriers and transfer of huge amount of cash.
 - (b) Strategic Initiative 5.3.2: Enhancing MoUs with relevant foreign forces/ organizations/ agencies for cross border cooperation in collection of persons and evidences.

- (c) Strategic Initiative 5.3.3: Making joint researches with neighboring countries to understand inflow/ outflow of materials and humans across the border areas.
- (d) Strategic Initiative 5.3.4: Enhancing liaison offices at the border areas in cooperation with neighboring countries.

Strategic Objective 5.4

- 58. To enhance international cooperation in mutual legal assistance in criminal matters concerning with AML/CFT
 - (a) Strategic Initiative 5.4.1: Establishing a mechanism to conduct mutual legal assistance in criminal matters.
 - (b) Strategic Initiative 5.4.2: Taking measures to raise awareness on mutual legal assistance in criminal matters.
 - (c) Strategic Initiative 5.4.3: Signing bilateral or multilateral agreements on mutual legal assistance in criminal matters.
 - (d) Strategic Initiative 5.4.4: Establishing case management system for effectiveness of incoming and outgoing international cooperation requests.

Strategic Objective 5.5

- 59. To enhance implementation of international treaties and conventions.
 - (a) Strategic Initiative 5.5.1: Designating a focal organization precisely to implement the relevant convention.
 - (b) Strategic Initiative 5.5.2: Completing the second cycle reviews of United Nations Convention against Corruption.
 - (c) Strategic Initiative 5.5.3: Taking measures to supervise and scrutiny the implementation of international treaties and conventions.
 - (d) Strategic Initiative 5.5.4: Taking measures to make the agencies understand their respective obligations as per the relevant international treaties and conventions.

Implementation and Regulating

- According to section 7 (b) in Chapter (4) of the Anti-Money Laundering Law, "developing and implementing a national strategy on the control of money laundering and terrorist financing" is one of the duties of the Anti-Money Laundering Central Body (AMLCB). In this regard, the national strategy will be materialized under the leadership of the Anti-Money Laundering Central Body. The following strategic areas will be implemented through Strategy Implementation Supervisory Committee assigned by AMLCB:
 - (a) Strategic Area I: The Strategy Implementation Supervisory Committee led by a member of AMLCB, Deputy Attorney General from Union Attorney General Office, including other concerned members of AMLCB will oversee activities in Strategic Area I, "Strengthening policies, instructions and legal frameworks on money laundering, terrorism and terrorist financing in line with international standards based on the identified risks."
 - (b) **Strategic Area II:** The Strategy Implementation Supervisory Committee led by Joint Secretary of AMLCB, FIU's Chief including other concerned members of AMLCB, will oversee activities in Strategic Area II, "Conducting functions of FIU more effectively."
 - (c) **Strategic Area III:** The Strategy Implementation Supervisory Committee led by a member of AMLCB, Governor of CBM, including other concerned members of AMLCB will oversee activities in Strategic Area III, "Implementing more effectively on AML/CFT preventive measures on banks and financial institutions and DNFBPs."
 - (d) **Strategic Area IV**: The Action Plan Implementation Supervisory Committee led by Secretary of AMLCB, Chief of Myanmar Police Force including other concerned members of AMLCB will oversee activities in Strategic Area IV, "Capacity development in investigation, prosecution and conviction of LEAs, prosecuting bodies and juridical authorities with respect to confiscation of Proceeds obtained from committing ML, its predicate offences and TF."

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(e) Strategic Area V: The Action Plan Implementation Supervisory Committee led by a member of AMLCB, Deputy Minister of

Ministry of Home Affairs including other concerned members of AMLCB will oversee activities in Strategic Area V,

"Enhancing internal and international collaboration on AML/CFT."

61. The Strategy Implementation Supervisory Committee will carry out intensive regulating, monitoring and evaluation of the

strategy implementation and oversee the management activities. The Groups will summit regular progress reports to the AMLCB and

will also formulate annual action plan.

62. The strategic objectives and strategic initiatives for each Strategic Areas will be implemented as per the Action Plan in the

Appendix. The AMLCB will also review and revise the national strategy based on time and circumstances of situation when new threats

and criminal techniques emerge in money laundering and financing to terrorism.

Conclusion

63. By implementing this national strategy, AML/CFT regime related legal frameworks, prevention, investigation, prosecution,

conviction, confiscation and international cooperation would be developed.

Anti-Money Laundering Central Body

Restricted

ACTION PLAN

Strategic Area I:

To strengthen & develop legal framework, directives and policies on anti-money laundering, counter terrorism and countering the financing of terrorism, in line with international standards and taking into account Myanmar's risk and context.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 1.1	1.1.1	Priority level (1)	2019-2021	<u>Focal</u>	Adoption the Law
To amend AML Law and AML	■ Widely define applicable to AML			<u>Department:</u>	
Rules in line with International	Law			AMLCB/ MFIU	
norms.	 Define to conduct freezing, seizing, confiscation on Predicate offences which is committed at abroad related with ML and proceed of crime Addressing special investigation power in relation to combat ML. Review the anti-money laundering law to amend the proportionate and dissuasive sanctions. To assign FIU as the 			Counterpart Agencies UAGO, AFCD, CBM, MPF, MOPF, SCU, IMF	
	organization for implementing				

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	core and key functions in AML				
	law in accordance with FATF				
	standard				
	■ To designate the structure and				
	function of FIU in AML Law.				
	■ Review the AML law and rules				
	to have power and procedure to				
	enable the LEAs to conduct				
	parallel investigation and the				
	power of freezing, seizing and				
	confiscation on illegal assets for				
	LEAs.				
	■ To designate the power of				
	competent authority to supervise				
	and take action on reporting				
	organizations.				
	■ To designate powers to obtain				
	information of beneficial				
	ownership and take into				
	account R 24 and 25 of FATF.				
	■ To address the factors of				

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	comply in relation to				
	designated High Risk Countries				
	by FATF.				
	■ To address the provisions for				
	procedures to enable the				
	confiscation of property of				
	correspondents value.				
	■ Review the AML law to insert				
	the provision for designated				
	investigation body to pursue				
	the money laundering cases.				
	(To review)				
	1.1.2	Priority Level(2)	2020–2022	<u>Focal</u>	Complete
	• Reviewing the words and terms			<u>Department</u>	adoption the AML
	of AML rules.			AMLCB, MFIU	rules.
				Counterpart	
				<u>Agencies</u>	
				UAGO, AFCD,	
				CBM, MPF,	
				MOPF, SCU,	
				IMF	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 1.2	1.2.1	Priority Level(1)	2019–2020	<u>Focal</u>	Finalized the law
To strengthen the legal	• Amending the Anti-			<u>Department:</u>	
framework of LEAs for	Corruption law in line with			ACC	
mitigating of proceed of	UNCAC (The complainant			<u>Counterpart</u>	
crime.	and informant protection,			<u>Agencies</u>	
	Sending complaints			UAGO, MFIU,	
	mechanism)			AFCD, CBM,	
	• To add power of			MOPF, BSI,	
	investigators in law and rule			SCU	
	to carry out parallel				
	investigation not only on				
	evaluated result of complain				
	letter also on its POC.				
	1.2.2	Priority Level (2)	2020–2021	<u>Focal</u>	Issue the Anti-
	• To draft the Anti–Corruption			<u>Department</u>	Corruption Rules
	Rules			ACC	
				<u>Counterpart</u>	
				<u>Agencies</u>	
				UAGO, MFIU,	
				AFCD, CBM,	
				MOPF,BSI, SCU	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	1.2.3	Priority Level (1)	2019–2022	<u>Focal</u>	Enacting the
	To draft the protection of forest			<u>Department</u>	forest law and
	rules.			MNREC	the protection of
				<u>Counterpart</u>	wildlife rules.
				<u>Agencies</u>	
				UAGO, MFIU	
	1.2.4	Priority Level (1)	2019–2022	<u>Focal</u>	Finalized the
	• To draft the protection of wildlife			<u>Department</u>	Rules
	rules.			MNREC	
				<u>Counterpart</u>	
				<u>Agencies</u>	
				UAGO, MFIU	
	1.2.5	Priority Level(1)	2019–2022	<u>Focal</u>	Finalized the tax
	To enact Tax Regulation law.			<u>Department:</u>	regulation law.
	To criminalize on tax crimes.			MOPF, IRD	
				<u>Counterpart</u>	
				<u>Agencies</u>	
				UAGO, MFIU	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	1.2.6	Priority Level (1)	2019-2022	<u>Focal</u>	Finalized strategy
	• To draft Compliance			<u>Department:</u>	
	Improvement Strategy.			MOPF, IRD	
				<u>Counterpart</u>	
				<u>Agencies</u>	
				UAGO, MFIU	
	1.2.7	Priority Level (1)	2019-2022	<u>Focal</u>	Finalized law.
	• To enact new Income-tax			<u>Department:</u>	
	regulation law			MOPF, IRD	
				<u>Counterpart</u>	
				<u>Agencies</u>	
				UAGO, MFIU	
	1.2.8	Priority Level (1)	2019–2022	<u>Focal</u>	Finalized law.
	• To review and amend the Custom			<u>Department:</u>	
	Law			Customs,	
	• To include the requirement of			MOPF	
	AML/CFT			Counterpart	
				<u>Agencies</u>	
				UAGO, MFIU	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	1.2.9	Priority Level (1)	2019-2022	<u>Focal</u>	Finalized law.
	• Reviewing and amending the			<u>Department:</u>	
	Gambling law.			MPF	
	• To include the requirement of			Counterpart	
	AML/CFT in relation to Casino.			<u>Agencies</u>	
				UAGO, MFIU,	
				MOHT	
	1.2.10	Priority Level (1)	2019-2022	<u>Focal</u>	Issuing the code
	To issue code of conduct			<u>Department:</u>	of conduct.
	regarding with combating on			All Departments	
	corruption all related sectors.			<u>Counterpart</u>	
				<u>Agencies</u>	
				UAGO	
	1.2.11	Priority Level (2)	2019-2023	<u>Focal</u>	Finalized strategy.
	• Lay down strategic framework to			<u>Department:</u>	
	combat drug and psychotropic			CCDAC, DED	
	substances.			Counterpart	
				<u>Agencies</u>	
				MOFA, MOBA, MOE,	
				MOI, MOALI, MOHS,	
				MSWRR, UN, NGO, INGO, CSO, CBOs	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	1.2.12	Priority Level (2)	2019–2020	<u>Focal</u>	Enacting the
	■ To review and drafting the			<u>Department</u>	rules.
	Narcotic Drugs and psychotropic substances rules.			CCDAC, DED	
				<u>Counterpart</u>	
				<u>Agencies</u>	
				MPF, BSI, GAD,	
				UAGO, Customs,	
				MOALI, SCU,	
				CBM, MOFA,	
				OAGU, FDA,	
				OJAG	
	1.2.13	Priority Level (1)	2019–2020	<u>Focal</u>	Complete the
	To review and amend the Anti –			<u>Department</u>	reviewing and
	Trafficking in Persons Law.			ATIP, ATIPCB	amending the
				<u>Counterpart</u>	
				<u>Agencies</u>	
				UAGO, SCU,	
				MFIU, AFCD	
	Trafficking in Persons Law.			Counterpart Agencies UAGO, SCU,	amending the law.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 1.3	1.3.1	Priority Level (1)	2019-2021	<u>Focal</u>	Finalized review
To strengthen the legal	• To review and develop the CT			<u>Department</u>	and amend the
framework of AML/ CFT	Law.			DTC, CCCT	law.
regime.	• To address for fully complied on				
	UNSCR resolutions and its			<u>Counterpart</u>	
	assessors resolutions in relation			<u>Agencies</u>	
	to financing of WMD (to			MFIU, AFCD,	
	implement by issuing orders)			UAGO, SCU	
	(CCCT)				
	1.3.2	Priority Level (1)	2019–2021	<u>Focal</u>	Issuing the CT
	Drafting the CT Rules.			<u>Department:</u>	rules.
				DTC, CCCT	
				<u>Counterpart</u>	
				<u>Agencies</u>	
				MPF, SCU,	
				CBM, MOPF,	
				UAGO, AFCD,	
				MFIU	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	 1.3.3 Amending the law relating to registration of Associations 2014. Ensure to be included preventive measure for preventing TF abuse by using NPOs to be in line with the AML/ CFT standards. 	Priority Level (1)	2019–2021	Focal Department: GAD Counterpart Agencies FIU, AFCD, UAGO, SCU	
Strategic Objectives 1.4 To develop the legal framework of International and domestic cooperation.	1.4.1 • To assign to the competent authority for negotiation, cooperation and exchange information on AML/CFT supervision with local and foreign counterpart agencies and lay down policy and procedure.	Priority Level (1)	2019-2023	Focal Department: AMLCB, MOPF, CBM, MFIU Counterpart Agencies AFCD, UAGO, DNFBPs	Adoption a policy for cooperation

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	1.4.2	Priority Level (2)	2020-2022	<u>Focal</u>	Amending the
	• To review on the weaknesses of			<u>Department:</u>	law.
	ME report concerning with			DTC	
	mutual legal assistance matter			Counterpart	
	and amend the law when it is			<u>Agencies</u>	
	needed to amend.			MOFA, MOPF,	
	Ensure to be included special			MPF, CBM,	
	Investigative techniques, case			MFIU, UAGO	
	management on mutual				
	assistance matters.				
	To assign to the competent				
	authority for negotiation,				
	cooperation and information				
	exchange on AML/CFT				
	supervision with local and				
	foreign counterpart agencies				
	and lay down policy and				
	procedure.				

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	 1.4.3 To issue the policies and guidance for mutual legal assistances to implement fast and effectively. 	Priority level (2)	2020-2022	Focal Department: MOHA, DTC Counterpart Agencies MOFA, MOPF, MPF, CBM, MFIU, UAGO	Issue the policy.
Strategic Objectives 1.5 To develop and strengthen CDD measures, monitoring system and AML/CFT procedure of Reporting Entities.	reporting organization for	Priority level (1)	2019-2021	Focal Department: AMLCB Counterpart Agencies MOPF, AFCD, CBM, MFIU, UAGO	Issued policies.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	1.5.2■ To issue CDD directives in relation to High Risk Countries.	Priority level (1)	2019–2021	Focal Department: AMLCB, MOPF, CBM Counterpart Agencies MFIU, AFCD, IMF	Issued Order.
	1.5.3 Review and amend the AML/CFT monitoring mechanism for transaction and financial records of customer.	Priority level (1)	2019-2021	Focal Department: AMLCB, MOPF, CBM Counterpart Agencies MFIU, AFCD, IMF	Issuing mechanism.
	 1.5.4 To issue guidance including steps and detail expressions to implement CDD directive operationally. 	Priority level (1)	2019-2021	Focal Department: AMLCB, MOPF, CBM Counterpart Agencies MFIU, AFCD, IMF	Issuing the guidance.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 1.6	1.6.1	Priority level (1)	2019-2023	<u>Focal</u>	Assign the
To strengthen regulatory	■ Designate competent authorities			<u>Department:</u>	competent
framework of supervisory	for all reporting entities.			AMLCB	authority.
authority on reporting				<u>Counterpart</u>	
organizations for AML/ CFT				<u>Agencies</u>	
regime.				MFIU, AFCD,	
				IMF, MOPF,	
				СВМ	
	1.6.2	Priority level (1)	2019–2023	<u>Focal</u>	Issue the policy.
	Lay down policy for cooperation			<u>Department:</u>	
	of AML/CFT supervision between			AMLCB	
	competent authorities.			<u>Counterpart</u>	
				<u>Agencies</u>	
				MFIU, AFCD, IMF	
				MOPF, CBM	
	1.6.3	Priority level (2)	2020–2022	<u>Focal</u>	Issued Procedure.
	■ To draw a supervision manual			<u>Department:</u>	
	base on RBA on AML/CFT for			MOPF, CBM,	
	respective area of competent			<u>Counterpart</u>	
	authority.			<u>Agencies</u>	
				MFIU, AFCD, IMF	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	1.6.4	Priority level (2)	2019-2023	<u>Focal</u>	Enacted the law.
	• To amend the Microfinance			<u>Department:</u>	
	Business Law (2011).			MOPF	
	• Ensuring the provision of			Counterpart	
	AML/CFT supervision.			<u>Agencies</u>	
				MFIU, CBM, IMF	
	1.6.5	Priority level (2)	2019-2023	<u>Focal</u>	Enacted the law.
	■ To amend the Insurance			<u>Department:</u>	
	Business Law (1996).			MOPF	
	■ Ensuring the provision of			<u>Counterpart</u>	
	AML/CFT supervision and			<u>Agencies</u>	
	provision of supervision are			MFIU, CBM, IMF	
	included.				
	1.6.6	Priority level (2)	2019–2023	<u>Focal</u>	Enacted the law.
	■ To enact new Loan Investment			<u>Department:</u>	
	Law.			MOPF	
	Ensuring the provision of			Counterpart	
	AML/CFT supervision and			Agencies	
	provision of supervision are			MFIU, CBM, IMF	
	included.				

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	1.6.7	Priority level (2)	2019-2023	<u>Focal</u>	Enacted the law.
	■ To issue Casino law and order.			<u>Department:</u>	
	■ Ensuring the provision of			MOPF	
	AML/CFT supervision and			Counterpart	
	provision of supervision are			Agencies	
	included.			MOHT, MFIU,	
				UAGO	
	1.6.8	Priority level (2)	2019-2023	<u>Focal</u>	Enacted the law.
	■ To develop the provision of			<u>Department:</u>	
	AML/CFT supervision and			MREA	
	provision of supervision are			<u>Counterpart</u>	
	included into Real Estate Law.			<u>Agencies</u>	
				MFIU, UAGO	
	1.6.9	Priority level (2)	2019-2023	<u>Focal</u>	Enacted the law.
	■ Reviewing of the Myanmar			<u>Department:</u>	
	Gemstone Law.			MNREC	
	Ensuring the provision of			Counterpart	
	AML/CFT supervision and			<u>Agencies</u>	
	provision of supervision are			MFIU, UAGO	
	included in the law.				

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	 To draw up and amend the laws for monitoring on banks and financial institutions. 	Priority level (3)	2021–2023	Focal Department: CBM, MOPF Counterpart Agencies MFIU, UAGO	Enacted the law.
Strategic Objective 1.7 Strengthen AML/CFT supervision framework for competent authority.	1.7.1 Issue Directives in relation to Identifying, Verification, keeping and informing of beneficial ownership information.	Priority level (1)	2019–2022	Focal Department: CBM, DICA, DNFBPs, UAGO, MOPF Counterpart Agencies MFIU, AFCD, AMLCB	Issued the directive.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 1.8	1.8.1	Priority level (2)	2019-2023	<u>Focal</u>	Issued policies
To mitigate the ML risk by	• To prescribe the threshold			<u>Department:</u>	and directives
widely using banking system	amount and to lay down policy			CBM, MOPF	
of public	and issue directives to use			Counterpart	
	banking system if it is over			<u>Agencies</u>	
	threshold amount in cashing			MFIU, AFCD,	
	down.			AMLCB	
Strategic Objective 1.9	1.9.1	Priority level (2)	2019-2023	<u>Focal</u>	Conducting the
To conduct the awareness	Developing program or action			<u>Department:</u>	knowledge
sharing of national risk	plan for awareness rising of			AMLCB	sharing
assessment results for	national risk assessment			<u>Counterpart</u>	workshop.
related sectors.	results.			<u>Agencies</u>	
				CBM, MOPF, MPF,	
				FIU, AFCD	
	1.9.2	Priority level (2)	2019–2023	<u>Focal</u>	Implemented
	■ To be updated the National Risk			Department:	
	Assessment once five years.			AMLCB	
				<u>Counterpart</u>	
				<u>Agencies</u>	
				CBM, MOPF, MPF,	
				FIU, AFCD	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	1.9.3	Priority level (2)	2019-2023	<u>Focal</u>	Shared results.
	• Lay down plan to disseminate			<u>Department:</u>	
	occasionally National Risk			AMLCB	
	Assessment Results			Counterpart	
				<u>Agencies</u>	
				CBM, MOPF,	
				MPF, MFIU,	
				AFCD	
Strategic Objective 1.10	1.10.1	Priority level (2)	2020-2021	<u>Focal</u>	Implemented it.
To mitigate the ML Risk by	■ Developing the plan to monitor			Department:	
utilizing informal remittances.	systematically and to phase out			CBM, MOPF	
	informal remittances by issuing			Counterpart	
	the license.			<u>Agencies</u>	
				AMLCB, MPF,	
				MFIU, AFCD	

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Strategic Area II: Conducting functions of FIU more effectively

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 2.1	2.1.1	Priority (2)	2020-2022	<u>Focal</u>	Organization
To establish modernist and qualified FIU.	■ Conducting the formation of structure of FIU to enhance it.			Department AMLCB, FIU Counterpart Agencies CBM, MOPF, UAGO, IMF, SCU	Structure.
	 2.1.2 Providing resources specifies qualification accordance to formation of FIU. Increase employee benefit. 	Priority (3)	2021–2023	Focal Department AMLCB, MFIU Counterpart Agencies CBM, MOPF, UAGO, SCU	Employment.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index	
Strategic Objective 2.2 To improve MFIU reporting system and quality of STR report from reporting agencies.	 Issuing the instruction and coordination with reporting institution and government agencies to be quick when requesting the additional information for analysis. 	Priority (1)	2019–2023	Focal Department AMLCB, FIU Counterpart Agencies CBM, MOPF, UAGO, LEAS, SCU	Receiving the information.	a
	2.2.2Implementing to upgrade the FIU Database after reviewing it.	Priority (2)	2020–2022	Focal Department AMLCB, MFIU Counterpart Agencies CBM, MOPF, AFCD, IMF	Upgrading the Database system	ie

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	2.2.3	Priority (3)	2019-2023	<u>Focal</u>	Sharing
	• Implementing awareness to			<u>Department</u>	knowledge about
	reporting institution to fill in			AMLCB, MFIU	STR.
	the blanks of STR report			Counterpart	5114
	completely.			<u>Agencies</u>	
				CBM, MOPF,	
				AFCD, IMF	
Strategic Objective 2.3	2.3.1	Priority (1)	2019–2021	<u>Focal</u>	Giving training.
To improve receiving and	• Implementing plan to give			<u>Department</u>	
analyzing process of MIFU.	training for operational and			AMLCB, MFIU	
	strategic analysis to staff.			Counterpart	
	 Conducting strategic analysis. 			<u>Agencies</u>	
				CBM, MOPF,	
				AFCD, IMF, MPF,	
	2.3.2	Dri ority (2)	2021 2022	LEAs, BSI	Upgrading of
		Priority (3)	2021–2023	<u>Focal</u>	10 0
	Implementing and occasionally			<u>Department</u>	analysis system.
	reviewing analysis process in line			AMLCB, MFIU <u>Counterpart</u>	
	with the SOP.			Agencies	
				CBM, MOPF,	
				AFCD, IMF,	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ In	dex
	2.3.3	Priority (2)	2020-2022	<u>Focal</u>	Improving	of
	Providing adequate resources to			<u>Department</u>	analysis	
	establish electronic analysis.			AMLCB, MFIU		
	• Researching and reporting			Counterpart		
	software and technology to be			<u>Agencies</u>		
	used in analysis.			CBM, MOPF,		
	• Step by step managing to			AFCD, IMF		
	conduct analysis electronically					
	depends on the allocated					
	budget.					
Strategic Objective 2.4	2.4.1	Priority (1)	2019–2021	<u>Focal</u>	Well re	ecord
Disseminating result of	Managing to be systematic			<u>Department</u>	keeping.	
analysis and to enhance	relevant organizations			AMLCB, MFIU		
process.	disseminating record.			Counterpart		
				<u>Agencies</u>		
				CBM, MOPF,		
				AFCD, IMF,		
				MPF, ACC,		
				Customs,		
				LEAs		

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	2.4.2	Priority (2)	2020-2022	<u>Focal</u>	Collecting
	• Administration to send			<u>Department</u>	information.
	feedback to reporting agencies.			AMLCB, MFIU	
				Counterpart	
				<u>Agencies</u>	
				CBM, MOPF,	
				AFCD, IMF,	
				MPF, ACC,	
				Customs,	
				LEAs	
Strategic Objective 2.5	2.5.1	Priority(1)	2019–2022	<u>Focal</u>	Be able to
To enhance sharing	Designating LOs and conducting			<u>Department</u>	collaborate.
information and cooperation.	relations regularly.			AMLCB, MFIU	
				<u>Counterpart</u>	
				<u>Agencies</u>	
				CBM, MOPF,	
				AFCD, MPF,	
				ACC,	
				Customs,	
				LEAs.	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	Planning to issue instruction to Supervisory Authority in order to report accurately.	Priority(2)	2019-2022	Focal Department AMLCB, MFIU Counterpart Agencies CBM, MOPF, AFCD, MPF, ACC, Customs, LEAs.	Report quality to be better.
	 2.5.3 To meet once in every three months with MFIU, competent authorities and reporting organizations to discuss on getting qualified reports. 	Priority(1)	2019-2023	Focal Department AMLCB, MFIU Counterpart Agencies CBM, MOPF, AFCD, MPF, ACC, Customs, LEAs.	Report quality to be better.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	2.5.4	Priority(3)	2021-2023	<u>Focal</u>	Report quality to
	Giving feedback to RIs in term			<u>Department</u>	be better
	of the quality of the report			AMLCB, MFIU	
	submitted to MFIU.			Counterpart	
				<u>Agencies</u>	
				CBM, MOPF,	
				AFCD, IMF,	
				MPF, ACC,	
				Customs,	
				LEAs.	
	2.5.5	Priority(3)	2019-2023	<u>Focal</u>	Report quality to
	• Implement and effectively			<u>Department</u>	be better
	execute MoUs between MFIU			AMLCB, MFIU	
	and international partners.			Counterpart	
				<u>Agencies</u>	
				CBM, MOPF,	
				AFCD, IMF	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 2.6 Awareness rising on AML/CFT knowledge to relevant organizations to implement it effectively.	 2.6.1 Implementing plan to give AML/CFT awareness rising to Supervisory Authorities. 	Priority(1)	2019-2023	Focal Department AMLCB, MFIU, CBM Counterpart Agencies MOPF, AFCD, IMF, DNFBPs	Report quality to be better
	 Implementing plan to give AML/CFT awareness rising to reporting organizations. 	Priority(1)	2019–2023	Focal Department AMLCB, MFIU, CBM Counterpart Agencies MOPF, AFCD, IMF, DNFBPs	Report quality to be better

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Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	2.6.3	Priority(2)	2019-2023	<u>Focal</u>	Report quality to
	Implementing plan to give			<u>Department</u>	be better
	AML/CFT awareness raising to			AMLCB, FIU,	
	LEAs			MPF	
				Counterpart	
				<u>Agencies</u>	
				AFCD,	
				Customs, ACC	

Strategic Area III:

To enhance the implementation of AML/CFT preventive measures by Competent Authorities, Self-regulatory Bodies, Financial Institutions and Designated Non-Financial Businesses and Professions (DNFBPS)

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 3.1	3.1.1	Priority(1)	2019–2021	<u>Responsible</u>	To get better
To strengthen the STR	Conducting to send STR timely.			<u>Agencies</u>	quality report.
reporting related to AML/CFT	• Planning a system that can be			CBM, MOPF,	. , .
by Reporting Institutions.	swift and better for reporting.			DNFBPs, MBA	
				Counterpart	
				<u>Agencies</u>	
				MFIU, AFCD,	
				IMF	
	3.1.2	Priority(1)	2019-2023	<u>Responsible</u>	Finishing
	• Awareness rising of skill &			<u>Agencies</u>	awareness rising.
	knowledge for reporting system.			AMLCB, CBM,	_
	 Awareness rising for reporting 			MOPF,	
	obligation.			DNFBPs, MBA	
				Counterpart	
				<u>Agencies</u>	
				MFIU, AFCD,	
				IMF	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	3.1.3	Priority(1)	2019-2021	Responsible	Collaboration
	• To form the Institution of			Agencies	
	Compliance Officer to contact			AMLCB, CBM,	
	directly with the Responsible			MOPF,	
	Agencies.			DNFBPs, MBA	
				Counterpart	
				<u>Agencies</u>	
				MFIU, AFCD,	
				IMF	
	3.1.4	Priority(2)	2020-2022	<u>Focal</u>	To get better
	To enhance reporting the cross			<u>Department</u>	quality report.
	border transaction of cash reports			AMLCB, CBM,	
	to FIU.			MOPF,	
				DNFBPs,	
				Customs	
				<u>Counterpart</u>	
				<u>Agencies</u>	
				MFIU, AFCD,	
				IMF	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 3.2	3.2.1	Priority(1)	2019-2021	<u>Focal</u>	To get more
To be developed and better in	• Laying down and implementing			<u>Department</u>	information.
getting the information of	plans which would be designating			AMLCB, CBM,	
Beneficial Owner and	more duties and power.			MOPF, DICA,	
Customer Due Diligence				MBA,DNFBPs	
Process by Reporting Entities.				Counterpart	
				<u>Agencies</u>	
				MFIU, AFCD,	
				IMF	
	3.2.2	Priority(1)	2019-2023	<u>Focal</u>	Finishing
	• Establish a plan to conduct			<u>Department</u>	awareness rising.
	training and awareness rising			AMLCB, CBM,	
	on AML/CFT concerning with			MOPF,	
	CDD including identification of			DICA,DNFBPs,	
	beneficial ownership			MBA	
	information.			Counterpart	
				<u>Agencies</u>	
				MFIU, AFCD,	
				IMF	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	3.2.3	Priority(2)	2020-2023	<u>Focal</u>	
	• Increasing taken action on non –			<u>Department</u>	
	compliance of CDD measure by			AMLCB, CBM,	
	using effective and dissuasive			MOPF,	
	administrative/criminal actions.			DICA,DNFBPs,	
				MBA	
				Counterpart	
				<u>Agencies</u>	
				MFIU, AFCD,	
				IMF	
	3.2.4	Priority(2)	2020–2023	<u>Focal</u>	Getting beneficial
	• Lay down the plan to get more			<u>Department</u>	ownerships'
	information concerning with			AMLCB, CBM,	information.
	identification, verification, and			MOPF,	inioniación.
	record keeping on beneficial			DICA,DNFBPs,	
	ownerships.			MBA	
				Counterpart	
				<u>Agencies</u>	
				MFIU, AFCD,	
				IMF	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	3.2.5• Implementing to enhance record keeping of beneficial ownership.	Priority(2)	2020–2023	Focal Department CBM, MOPF, DICA,DNFBPs Counterpart Agencies MFIU, AFCD, IMF	Can get more information about BO.
Strategic objectives 3.3 To develop record keeping system & transaction monitoring by reporting institution.	3.3.1 • Implementing procedures to monitor the transactions & accounts of customer in term of AML/CFT.	Priority(1)	2019-2021	Focal Department CBM, MOPF, DICA, DNFBPS, UMFCCI, MBA Counterpart Agencies MFIU, AFCD, IMF	Laying down procedures.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	3.3.2	Priority(2)	2019-2023	<u>Focal</u>	Be able to give
	• Providing training for CDD, EDD,			<u>Department</u>	training.
	STR Red Flag Indicator			CBM, MOPF,	
	Typologies.			DICA, DNFBPs	
				Counterpart	
				<u>Agencies</u>	
				MFIU, AFCD,	
				IMF	
	3.3.3	Priority(2)	2019-2023	<u>Focal</u>	Be able to use
	• Implementing to use IT			<u>Department</u>	technology
	technology increasingly for			CBM, MOPF,	
	transaction analysis.			DICA,	
				DNFBPs, MBA	
				Counterpart	
				<u>Agencies</u>	
				MFIU, AFCD,	
				IMF	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	3.3.4	Priority(3)	2021–2023	<u>Focal</u>	Be able to use
	• Implementing database system			<u>Department</u>	technology
	used sophisticated data storage			CBM, MOPF,	
	technology.			DICA,	
				DNFBPs, MBA	
				Counterpart	
				<u>Agencies</u>	
				MFIU, AFCD,	
				IMF	
Strategic Objective 3.4	3.4.1	Priority(1)	2019–2023	<u>Focal</u>	Identify risk.
To commensurate AML/CFT	Conducting sectoral ML/TF risk			<u>Department</u>	
preventive measures with the	assessment, assess before			CBM, MOPF,	
risk profile	utilizing or starting new technical			DICA,	
	assistance, products and services,			DNFBPs,	
	requesting technical assistance as			Customs,	
	necessary.			MBA, UMFCCI	
				Counterpart	
				<u>Agencies</u>	
				AMLCB, MFIU,	
				AFCD, IMF	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	 3.4.2 Providing technology and knowledge on conducting ML/TF risk assessment for every single sector. 	Priority(2)	2020-2022	Focal Department CBM, MOPF, DICA, DNFBPS, MPF, Customs, ACC, MBA Counterpart Agencies MFIU, AFCD, IMF	Awareness rising.
	3.4.3Taking measures to manage risks based on sectorial risk assessment results.	Priority(3)	2021-2023	Focal Department CBM, MOPF, DICA, DNFBPs, Customs, MBA, UMFCCI	Reduce the Risks
Strategic Objective 3.5 Implement effective supervision using a risk-based approach.	3.5.1Enhancing supervision on reporting and CDD process.	Priority(1)	2019-2023	Counterpart Agencies MFIU, AFCD, IMF Counterpart Agencies MFIU, AFCD, IMF	Monitoring on CDD process.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ In	dex
	3.5.2	Priority(2)	2019-2023	<u>Focal</u>	Enhancing	the
	• Implementing internal AML			<u>Department</u>	capacity	
	policies & procedures in every			CBM, MOPF,		
	single sector			DICA,		
	• Conducting audit & capacity			DNFBPs, MBA,		
	building for staff in			Customs,		
	accordance with internal AML/			UMFCCI		
	CFT policies.			Counterpart		
				<u>Agencies</u>		
				MFIU, AFCD,		
				IMF		
	3.5.3	Priority(2)	2019–2023	<u>Focal</u>	Conducting	
	• To supervise and take action for			<u>Department</u>	control in	line
	absence on implementing			CBM, MOPF,	with policy.	
	internal AML/CFT control.			DICA, DNFBPs,	with policy.	
				MBA, Customs,		
				UMFCCI		
				<u>Counterpart</u>		
				<u>Agencies</u>		
				MFIU, AFCD,		
				IMF		

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	3.5.4	Priority(1)	2019-2023	<u>Focal</u>	Monitoring on
	• Implementing manual &			<u>Department</u>	implement.
	procedures to supervise by			CBM, MOPF,	-
	conducting effective on-site			DICA,	
	Inspection & off-site monitoring.			DNFBPs,	
				Customs,	
				UMFCCI	
				Counterpart	
				<u>Agencies</u>	
				MFIU, AFCD,	
				IMF	
	3.5.5.	Priority(2)	2019-2023	<u>Focal</u>	Enhance capacity
	Developing and implementing			<u>Department</u>	building.
	policy to enhance capacity of			CBM, MOPF,	<u> </u>
	officials of AML/CFT on-site			DICA,DNFBPs, Customs, UMFCCI	
	team.			<u>Counterpart</u>	
				Agencies	
				FIU, AFCD,	
				IMF	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	3.5.6	Priority(3)	2021-2023	<u>Focal</u>	Monitoring on
	Developing and implementing			<u>Department</u>	implement.
	plans to extend the			CBM, MOPF,	
	appointment of skilful staffs for			DICA,	
	on–site team.			DNFBPs,	
				Customs,	
				UMFCCI	
				Counterpart	
				<u>Agencies</u>	
				MFIU, AFCD,	
				IMF	
	3.5.7	Priority(3)	2021-2023	<u>Focal</u>	Conduct
	• Amending up to date AML/CFT			<u>Department</u>	supervision.
	control for subsidiaries &			CBM, MOPF,	
	correspondent firms by			DICA, UMFCCI	
	reviewing the procedures &			Counterpart	
	guidance			<u>Agencies</u>	
				MFIU, AFCD,	
				IMF	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	3.5.8	Priority(3)	2021-2023	<u>Focal</u>	Conduct
	• Implementing plan to monitor			<u>Department</u>	supervision.
	the subsidiaries &			CBM, MOPF,	
	correspondents firms.			DICA, UMFCCI	
				Counterpart	
				<u>Agencies</u>	
				MFIU, AFCD, IMF	
	3.5.9	Priority(2)	2020–2023	<u>Focal</u>	Conduct
	• To set up manual, procedures			<u>Department</u>	supervision.
	and plan that applies RBA			CBM, MOPF,	
	supervision of banks and			DICA, UMFCCI	
	Financial Supervisory Authority.			<u>Counterpart</u>	
				<u>Agencies</u>	
				MFIU, AFCD, IMF	
	3.5.10	Priority(2)	2019–2023	<u>Focal</u>	Conduct
	• Implementing plan to			<u>Department</u>	supervision.
	mitigate risk identified by			AMLCB, DNFBPs,	
	applying RBA for DNFBPs.			DICA,	
				Counterpart	
				<u>Agencies</u>	
				MFIU, AFCD, IMF	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 3.6	3.6.1	Priority(2)	2020-2023	<u>Focal</u>	To mitigate risk.
To carry out the obligation	• To set out AML/CFT's criteria for			<u>Department</u>	
of the staff from banks and	assigning staff.			CBM, MOPF,	
financial institutions, and				DICA,	
DNFBPs without corruption				Customs,	
& to promote efficiency in				UMFCCI, MBA	
conducting AML/CFT tasks.				Counterpart	
				<u>Agencies</u>	
				AMLCB, MFIU,	
				AFCD, IMF	
	3.6.2	Priority(2)	2020-2023	<u>Focal</u>	To mitigate
	To enact and implement the			<u>Department</u>	corruption.
	Code of Conducts.			CBM, MOPF,	
				DICA,	
				Customs,	
				UMFCCI, MBA	
				Counterpart	
				<u>Agencies</u>	
				AMLCB, MFIU,	
				AFCD, IMF	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	3.6.3	Priority(3)	2021-2023	<u>Focal</u>	To mitigate
	• Implementing to develop in			<u>Department</u>	corruption.
	moral & ethic.			CBM, MOPF,	·
				DICA, DNFBPs,	
				Customs,	
				UMFCCI, MBA	
				<u>Counterpart</u>	
				<u>Agencies</u>	
				AMLCB, MFIU,	
				AFCD, IMF	
	3.6.4	Priority(2)	2019–2023	<u>Focal</u>	Awareness rising.
	● To take action & providing			<u>Department</u>	
	awareness regard to anti-			CBM, MOPF,	
	corruption.			DICA, Customs,	
				DNFBPs, MBA,	
				UMFCCI	
				<u>Counterpart</u>	
				<u>Agencies</u>	
				AMLCB, MFIU,	
				AFCD, IMF	

Strategic Area IV:

To build capacity in law enforcement agencies, prosecution and judicial authorities to investigate, prosecute, convict, and sanction money laundering, its predicate offences, and financing of terrorism.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 4.1	4.1.1	Priority (1)	2019–2020	<u>Focal</u>	Well training.
Enhance the effective	• To train and giving awareness to			<u>Department</u>	
investigation, prosecuting	conduct parallel financial			CCDAC, MPF,	
and sanction on Anti-Money	investigation, when investigating			Customs, BSI,	
Laundering and Combating	predicate offences at the same			AFCD, ACC	
the Financing of Terrorism	time by LEAs.			Counterpart	
				<u>Agencies</u>	
				AMLCB, MFIU	
	4.1.2	Priority (1)	2019-2020	<u>Focal</u>	Conducting
	• Issuing the directives and			<u>Department</u>	parallel
	supervise to conduct financial			CCDAC, MPF,	investigation.
	investigation when investigating			Customs, BSI,	
	the money laundering offences.			AFCD, ACC	
				Counterpart	
				<u>Agencies</u>	
				AMLCB, MFIU	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	4.1.3To make a plan for adding lecture into curriculum of training school for LEAs.	Priority (1)	2019–2023	Focal Department CCDAC, MPF, Customs, BSI, AFCD, ACC Counterpart	Giving lecture.
	4.1.4Making plans to attend International courses for LEAs.	Priority (1)	2019–2023	Agencies AMLCB, MFIU Focal Department CCDAC, MPF, Customs, BSI, ACC Counterpart	Send to aboard.
				Agencies AMLCB, AFCD, MFIU	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	4.1.5Attach the investigators as secondment to other FIUs and LEAs in foreign countries to get	Priority (3)	2022-2023	Focal Department CCDAC, MPF, Customs, BSI,	Effective investigation.
	international experience on AML/ CFT.			ACC Counterpart Agencies AMLCB, AFCD, MFIU	
	 4.1.6 To lay down a plan for assessing the qualification of staffs to decide whether requiring to assign staffs or having necessary skills to attend AML/ CFT training. 	Priority (2)	2020-2021	Focal Department MPF, Customs, BSI, ACC Counterpart Agencies AMLCB, AFCD, MFIU	Complete assessments.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	4.1.7To give awareness on AML/ CFT to prosecution and judicial authorities	Priority (1)	2019-2020	Focal Department SCU, UAGO, Bar Council Counterpart Agencies AMLCB, AFCD, MFIU	
	 4.1.8 To make a plan to supervise step by step on collecting evidence when constructing the case. 	Priority (1)	2019–2021	Focal Department CCDAC, MPF, Customs, BSI, AFCD, ACC Counterpart Agencies AMLCB, MFIU	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	Assign the department or body to conduct investigation on ML/ TF.	Priority (1)	2019-2021	Focal Department CCDAC, MPF, Customs, BSI, AFCD, ACC Counterpart Agencies AMLCB, MFIU	Allocate the investigation body.
	 4.1.10 To make a mechanism to exchange information with FIUs. Assigning the 	Priority (1)	2019–2020	Focal Department CCDAC, MPF, Customs, BSI, MFIU, ACC Counterpart Agencies AMLCB, AFCD	Exchange information.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	4.1.11To train and support necessary aid for special investigations technique.	Priority (2)	2020-2022	Focal Department CCDAC, MPF, Customs, BSI, AFCD, ACC Counterpart Agencies AMLCB, MFIU	Conducting the special investigation.
	4.1.12Making plans to get a necessary budget in investigating ML/TF.	Priority (2)	2020-2022	Focal Department CCDAC, MPF, Customs, BSI, AFCD, ACC Counterpart Agencies AMLCB, MFIU	Receiving budget.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 4.2 Conducting control, freezing and confiscation of Illegal possessions effectively on ML/TF.	 4.2.1 Issuing the policy and procedure to collaborate with relevant organizations to control, freezing and confiscation of proceed of crime. 	Priority (1)	2019-2021	Focal Department CCDAC, MPF, Customs, BSI, AFCD, ACC Counterpart Agencies AMLCB, MFIU	
	 Developing and implementing plans to enhance the confiscation of money and property with the cooperation of international counterparts in consistent with Mutual Assistance in Criminal Matter Law. 	Priority (1)	2019-2021	Focal Department CCDAC, MPF, Customs, BSI, AFCD, ACC Counterpart Agencies AMLCB, MFIU	Effective seizing.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	4.2.3Making plans to give Proficiency Courses on Assets Recovery.	Priority (2)	2020-2021	Focal Department MPF, Customs, AFCD, ACC, BSI Counterpart Agencies AMLCB, FIU	Complete courses.
	4.2.4To establish assets management system on seizure.	Priority (3)	2022-2023	Focal Department SCU, CCDAC, MPF, Customs, BSI, AFCD, ACC Counterpart Agencies AMLCB, MFIU	Effective seizing.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 4.3 Conducting AML/CFT regime effectively in performing border area security and identification.	 4.3.1 Making plans to give AML/CFT capacity building courses for organization serving at border areas. 	Priority (1)	2019–2020	Focal Department CCDAC, MPF, Customs Counterpart Agencies AMLCB, AFCD, FIU	Complete courses.
	 4.3.2 Making plan to increase the number of staffs and enable them to use the high-end Machines. 	Priority (2)	2021-2022	Focal Department CCDAC, MPF, Customs, AFCD, ACC Counterpart Agencies AMLCB, MFIU	Increasing the number of staff.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	 4.3.3 Making plans to check properties and money flows entered from illegal channel by permanent checkpoints and mobile special checking teams. 	Priority (2)	2020-2021	Focal Department CCDAC, MPF, Customs Counterpart Agencies AMLCB, AFCD, FIU	Improvement of scrutiny in border areas.
	 4.3.4 Cooperation with customs departments from international or borderline countries. 	Priority (3)	2022-2023	Focal Department MOPF, Customs Counterpart Agencies AMLCB, MPF, AFCD, FIU	Improvement of scrutiny tasks in border areas.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	 4.3.5 Making plans to conduct NRA on AML/CFT depending on agencies which perform border security and scrutiny. 	Priority (3)	2022-2023	Focal Department MOPF, Customs, CCDAC, MPF, Counterpart Agencies AMLCB, AFCD, FIU	Conducting the NRA.
Strategic Objective 4.4 To combat money laundering and terrorist financing without corruption.	4.4.1Making plans to get enough salary and stipend for staff.	Priority (2)	2021–2022	Focal Department MOPF, Customs, MPF, ACC, BSI Counterpart Agencies AMLCB, AFCD, FIU	Supporting to staff.
	 4.4.2 Making welfare plans for staff depending on relevant law enforcement agencies. 	Priority (3)	2022–2023	Focal Department MOPF, Customs, MPF, ACC, BSI Counterpart Agencies AMLCB, AFCD, FIU	Conduct welfare.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index	(
	 4.4.3 To allocate the duty and functions for each layer and to lay down the plan for supervision. 	Priority (3)	2022-2023	Focal Department MOPF, Customs, MPF, ACC, BSI Counterpart Agencies AMLCB, AFCD, FIU	Mitigate the corruption.	ne
	4.4.4Making preventive measure on anti-corruption.	Priority (1)	2019–2020	Focal Department MOPF, Customs, MPF, ACC, BSI Counterpart Agencies AMLCB, AFCD, MFIU	Mitigate ti corruption.	ne

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	4.4.5	Priority (1)	2019–2020	<u>Focal</u>	Mitigate the
	• To establish Corruption			<u>Department</u>	corruption.
	Prevention Unit- CPU.			MOPF, Customs,	
				MPF, ACC, BSI	
				<u>Counterpart</u>	
				<u>Agencies</u>	
				AMLCB,AFCD, FIU	
Strategic Objective 4.5	4.5.1	Priority (1)	2019–2020	<u>Focal</u>	Reduction Crime.
To reduce proceeds of	• Drafting strategy of crime			<u>Department</u>	
crime.	reduction.			MPF	
				Counterpart	
				<u>Agencies</u>	
				AMLCB, AFCD, FIU	
	4.5.2	Priority 2	2020–2021	<u>Focal</u>	Collecting
	• Establishing Data-Based System			<u>Department</u>	Criminal Records.
	on criminal occurrence,			MPF, BSI, UAGO,	
	prosecution, sanction and			SCU, AFCD	
	confiscation.			<u>Counterpart</u>	
				<u>Agencies</u>	
				AMLCB, MFIU	

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Strategic Area V:

To Enhance the Domestic and International Cooperation

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 5.1	5.1.1	Priority (1)	2019–2020	<u>Focal</u>	Completing to
To develop international and domestic co-operation on	Issuing procedures and guidelines between FIU and law			<u>Department</u> AMLCB, FIU	issue procedure and guidelines.
combating money laundering and financing of	enforcement entities to cooperate.			Counterpart	and guidelines.
terrorism with government				<u>Agencies</u>	
organizations.				MPF, BSI,	
				Customs, ACC	
	5.1.2	Priority (2)	2020–2021	<u>Focal</u>	Enhance
	 Plan to share awareness on cooperation to exchange financial 			<u>Department</u>	awareness.
	information with law			AMLCB, FIU,	
	enforcement agencies.			MPF, BSI	
				Customs, ACC	
				<u>Counterpart</u>	
				<u>Agencies</u>	
				IMF	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	5.1.3	Priority (2)	2020-2021	<u>Focal</u>	Completing of
	• Distributing SOP for			<u>Department</u>	Distribution SOP.
	cooperation and sharing information.			AMLCB, FIU,	
				Customs, ACC	
				Customs, Acc	
				<u>Counterpart</u>	
				<u>Agencies</u>	
				IMF	
	5.1.4	Priority (3)	2022 - 2023	<u>Focal</u>	Lay down plan for
	• Taking measures to establish			<u>Department</u>	collaborate.
	the cooperation mechanism between DICA and IRD in order			DICA, IRD	
	to enhance the transparency			<u>Counterpart</u>	
	and beneficial ownership Legal			<u>Agencies</u>	
	Persons and Legal Arrangement.			MOPF, BSI,	
				AMLCB, FIU,	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 5.2	5.2.1	Priority (1)	2019-2020	<u>Focal</u>	Exchanging
To develop international	• Enhance and strengthen			<u>Department</u>	information.
cooperation on AML/ CFT.	international cooperation and			AMLCB, FIU,	
	establish mechanism for sharing ML/TF information			MPF, BSI,	
	bilaterally and internationally.			Customs, ACC	
	• Establish the SOPs for			Counterpart	
	prioritization and execution of			<u>Agencies</u>	
	international cooperation			IMF	
	requests.	Dui - uit /1\	2010 2020	FI	Fresh an altera
	5.2.2	Priority (1)	2019–2020	<u>Focal</u>	Exchanging
	Making a plan for cooperation			<u>Department</u>	information.
	between correspondent banks			CBM, MOPF,	
	linked with international.			MBA	
				Counterpart	
				<u>Agencies</u>	
				AMLCB, MFIU,	
				AFCD, IMF	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	5.2.3	Priority (2)	2020-2021	<u>Focal</u>	Enhance
	• Enhance awareness arising			<u>Department</u>	awareness
	workshops and training for			AMLCB, FIU,	
	international cooperation.			MPF, BSI,	
				Customs,	
				AFCD, ACC,	
				CBM, MBA	
				Counterpart	
				<u>Agencies</u>	
				IMF	
	5.2.4	Priority (2)	2020–2021	<u>Focal</u>	Became a
	• Endeavour to become the			<u>Department</u>	member of
	member of the Egmont Group.			AMLCB, FIU	Egmont Group.
				<u>Counterpart</u>	
				<u>Agencies</u>	
				IMF, AMLO,	
				AFCD, BSI	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	 5.2.5 Enhance awareness arising for using the ARINAP and INTERPOL I 24/7 network. 	Priority (2)	2020-2021	Focal Department MPF Counterpart Agencies AMLCB, FIU, AFCD, BSI	Enhance awareness
	 5.2.6 Increase the number of MoU with foreign countries in order to freeze, seize or confiscate when assets are located in other jurisdictions. 	Priority (1)	2019–2020	Focal Department AMLCB, MPF, BSI, Customs, AFCD, ACC, CBM Counterpart Agencies AMLCB, FIU	Complete to Sign MOU.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	 5.2.7 Increase the number of bilateral or multilateral agreements with foreign countries on Extradition. 	Priority (1)	2019–2020	Focal Department MOHA Counterpart Agencies AMLCB, FIU, MPF, BSI	Complete to sign agreements.
	 5.2.8 Build the cooperation with Myanmar embassies and consulates in foreign countries. 	Priority (1)	2019–2020	Focal Department MOHA Counterpart Agencies AMLCB, FIU, MPF, BSI	Complete cooperation.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 5.3 To enhance cross border cooperation on AML/ CFT.	 5.3.1 Cooperation with neighbouring countries to strengthen cross border declaration systems to manage risks from bulk cash movements and cash couriers. 	Priority (1)	2019–2020	Focal Department MOPF, CCDAC, MPF, Customs Counterpart Agencies AMLCB, FIU, MPF, BSI	Cooperation.
	 5.3.2 Increase the signing of MOU with foreign counterpart agencies for cross border cooperation for collecting evidence and people. 	Priority (1)	2019–2020	Focal Department MOHA, MPF, Customs, ACC Counterpart Agencies AMLCB, FIU, BSI	Completing the Signing MOU.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	 5.3.3 Making researches on inflow/ outflow of materials and human at border area by cooperating with neighbouring countries. 	Priority (2)	2020–2021	Focal Department AMLCB, MPF, Customs Counterpart Agencies FIU, BSI	Researches complete.
	5.3.4Establishing the office for contacting with neighbouring countries.	Priority (3)	2021-2023	Focal Department MOHA, MPF, MOPF, Customs Counterpart Agencies AMLCB, FIU	Completing the establishment of cooperation office.

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 5.4	5.4.1	Priority (1)	2019-2021	<u>Focal</u>	Completing the
To develop for cooperation	• To establish mechanism to			<u>Department</u>	establishment of
of mutual legal assistance	implement mutual legal			MOHA, MPF,	mechanism.
on criminal matters	assistance on criminal matters.To assign a focal agency to			DTC	
concerning with AML/CFT.	conduct mutual legal assistance			Counterpart	
	on criminal matters.			<u>Agencies</u>	
	• To support technique and			AMLCB, FIU	
	resources for the focal agency.				
	5.4.2	Priority (2)	2020-2022	<u>Focal</u>	Giving enhance
	• Planning to enhance awareness			<u>Department</u>	awareness.
	on mutual legal assistance for			MOHA, MPF,	
	criminal matters.			DTC	
				Counterpart	
				<u>Agencies</u>	
				AMLCB, FIU,	
				BSI	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	5.4.3	Priority (2)	2020-2022	<u>Focal</u>	Signing
	• Enhance the singing of bilateral			<u>Department</u>	agreements.
	or international agreement for mutual legal assistance matters.			мона, мрг,	
	mataat tegat assistance matters.			DTC	
				Counterpart	
				<u>Agencies</u>	
				AMLCB, FIU,	
				BSI	
	5.4.4	Priority (2)	2020-2022	<u>Focal</u>	Completing the
	Develop a case management			<u>Department</u>	establishment of
	system (statistics) for the effective processing of incoming			MOHA, MPF,	case
	and outgoing international			DTC	management
	cooperation requests.			Counterpart	system.
				<u>Agencies</u>	
				AMLCB, FIU,	
				BSI	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
Strategic Objective 5.5	5.5.1	Priority (1)	2019-2020	<u>Focal</u>	Finishing to
To enhance implementation	• To allocate and assign a focal			<u>Department</u>	assign the
on international treaties and	organization to implement relative conventions.			AMLCB	organizations.
conventions related on				<u>Counterpart</u>	
Terrorist Financing.				<u>Agencies</u>	
				AFCD, FIU,	
				CBM, MOPF,	
				BSI	
	5.5.2	Priority (1)	2019–2021	<u>Focal</u>	Completing
	• Finalizing second circle review			<u>Department</u>	second circle.
	of United Nation Convention on Corruption.			ACC	
				Counterpart	
				<u>Agencies</u>	
				AMLCB, AFCD,	
				FIU,	

Strategic Objectives	Strategic Initiatives	Priority level	Timeframe	Responsibility	Measure/ Index
	5.5.3	Priority (3)	2021-2023	<u>Focal</u>	Completing the
	● Make a plan to supervise the			<u>Department</u>	implementation.
	situation of compliance on			AMLCB,	
	conventions ratified by the			CCDAC,	
	State.			мона, свм,	
				ACC,	
				Counterpart	
				<u>Agencies</u>	
				AFCD, FIU,	
				MOFA, BSI	
	5.5.4	Priority (3)	2021-2023	<u>Focal</u>	Completing the
	● Making a plan for giving			<u>Department</u>	implementation.
	awareness on responsibility			AMLCB,	-
	under convention as relevant			CCDAC,	
	organizations.			мона, свм,	
				ACC	
				Counterpart	
				<u>Agencies</u>	
				AFCD, FIU,	
				MOFA	

Abbreviations

ACC	Anti-Corruption Commission
ADB	Asia Development Bank
AFCD	Anti-Financial Crime Division
AML	Anti-Money Laundering
AMLCB	Anti-Money Laundering Central Board
APG	Asia-Pacific Group on Money Laundering
AML/CFT Regime	Anti-Money Laundering & Countering the Financing of Terrorism Regime
ВО	Beneficial Owner
BSI	Bureau of Special Investigation
СВМ	Central Bank of Myanmar
СССТ	Central Committee of Counter Terrorism
CCDAC	Central Committee for Drug Abuse Control
CDD	Customer Due Diligence
Customs	Customs Department
DED	Drug Enforcement Division
DTC	Division against Transnational Crimes
DICA	Directorate of Investments and Company Administration
DNFBPs	Designated Non-Financial Business and Professions
EDD	Enhance Due Diligence
DPMS	Dealers in Precious Metals and Stones

FATF	Financial Action Task Force
FDA	Food and Drugs Administration
FIU	Financial Intelligence Unit
FRD	Financial Regulatory Development
GAD	General Administration Department
IRD	Internal Revenue Departments
LA	Legal Arrangement
LEAs	Law Enforcement Agencies
LP	Legal Person
MBA	Myanmar Banks Association
ML/FT	Anti-Money Laundering & Financing of Terrorism
МОВА	Ministry of Border Affairs
МОНА	Ministry of Home Affairs
MOPF	Ministry of Planning and Finance
MOALI	Ministry of Agriculture, Livestock and Irrigation
MOHT	Ministry of Hotel and Tourism
MOHS	Ministry of Health and Sport
MoU	Memorandum of Understanding
MPF	Myanmar Police Force
MMFA	Myanmar Micro-Finance Association
MSB	Money Service Business
MNREC	Ministry of Natural Resources and Environmental Conservation

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MRESA	Myanmar Real-Estate Service Association
MSWRR	Ministry of Social Welfare, Relief and Resettlement
OJAG	Office of the Judge Advocate General
OAGU	Office of the Auditor General of the Union
WB	World Bank
UAGO	Union Attorney General's Office
USAID	United States Agency for International Development
UKAID	United Kingdom Agency for International Development
NPO	Non-Profit Organization
SCU	The Supreme Court of the Union
SECM	The Security and Exchange Commission of Myanmar
STR	Suspicious Transaction Report