# FINANCIAL INTELLIGENCE UNIT ANNUAL REPORT 2024



MINISTRY OF JUSTICE CRIMINAL POLICE PORTUGAL



# INDEX

| FOREWORD03  | PREDICATE OFFENCES                            |
|---|---|
| FINANCIAL INTELLIGENCE UNIT                               | PREDICATE OFFENCES TO MONEY LAUNDERING27      |
| EVOLUTION OF THE No. OF REPORTS RECEIVED10                | TERRORISM FINANCING                           |
| REPORTS ANALYSED 2024                                     | RESTRICTIVE MEASURES                          |
| REPORTS ANALYSED - BY SECTOR                              | PROPOSALS FOR FREEZING                        |
| REPORTS ANALYSED - BY TYPE OF ENTITY13                    | SUSPICIOUS REPORTS RECEIVED - DUTY TO REFRAIN |
| REPORTS ANALYSED - FINANCIAL SECTOR14                     | PROPOSALS FOR FREEZING - NUMBERS32            |
| REPORTS ANALYSED - FINANCIAL SECTORAL ENTITIES16          | STRATEGIC ANALYSIS                            |
| REPORTS ANALYSED - NON-FINANCIAL SECTOR                   | INTERNATIONAL COOPERATION                     |
| REPORTS ANALYSED - NON-FINANCIAL SECTORAL AUTHORITIES18   | DOMESTIC COOPERATION36                        |
| REPORTS ANALYSED - AUXILIARY ENTITIES                     | FEEDBACK38                                    |
| REPORTS ANALYSED - SUPERVISION AUTH. AUXILIARY ENTITIES20 | DISSEMINATION OF INFORMATION                  |
| REPORTS ANALYSED - OTHER ENTITIES21                       | FIU COOPERATION/PARTICIPATION42               |
| THRESHOLD REPORTS RECEIVED                                | DISSEMINATION OF INFORMATION48                |
| SUSPICIONS CONFIRMED                                      | CONTACTS49                                    |

In 2024, the upward trend in requests continued, leading the FIU to adjust existing methodologies, creating and implementing new approaches, with the aim of improving the effectiveness scores of the systems in use.

In parallel, the development and testing of the new goAML Portal has continued and is expected to come into operation soon.

The goAML Portal will introduce a new approach to the relationship between the FIU, the obliged entities and the sectoral authorities provided for in Law No 83/2017 of 18 August, and also with the entities provided for in Law 54/2021 of 13 August. It is an online platform that provides specific forms for each type of entity, allowing for the completion and submission of suspicious and threshold transaction reports, as well as requests for financial information and operational analysis reports.

The portal ensures that the reports in question will be delivered simultaneously to the Public Prosecutor's Office (DCIAP).

The testing phase of the STR Portal started at the end of 2022, with the participation of some financial sector entities, extended during 2024 to more entities in the same sector and also in the non-financial sector.

In 2024, measures were implemented which resulted in a significant increase in the dissemination of relevant information at both national and international level.

Together with the Institute for Public Management and Administration (IGAP) and the Institute for Public Markets, Real Estate and Construction, I.P. (IMPIC, I.P.), the FIU organized in November, in continuation of the success of the previous events, a seminar on the 'Building, Prevention and Duties, Money Laundering and Terrorist Financing', which took place at the University Campus of the University of Algarve, which was sold out with the presence of more than one hundred real estate professionals.

Although Law No 83/2017 of 18 August has been in force for more than seven years, there are still obliged entities that report little or nothing at all, contrasting with others in the same business area that do so regularly.

Financial entities continue to stand out as being primarily responsible for submitting reports. By contrast, the number of reports from non-financial entities remains significantly low and is disproportionate to the turnover inherent to their areas of activity.

In 2024, the European Union adopted a new legislative package to prevent and combat money laundering and terrorist financing, consisting of:

- A Regulation establishing a new European Union Anti-Money Laundering Authority (AMLA) with the power to impose sanctions and fines; (Regulation (EU) 2024/1620 of the European Parliament and of the Council of 31 May 2024);
- A regulation revising the Regulation on Transfers of Funds, adopted in May 2023, with the aim of making crypto-assets transfers more transparent and fully traceable (Regulation (EU) 2023/1113 of the European Parliament and of the Council of 31 May 2023);
- A regulation on the prevention of the use of the financial system for the purpose of money laundering and terrorist financing;
   REGULATION (EU) 2024/1624 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 May 2024;
- A Directive laying down the mechanisms to be created by the Member States in order to prevent the use of the financial system for the purpose of money laundering and terrorist financing (DIRECTIVE (EU) 2024/1640 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 May 2024.

António Oliveira Director

THE FIU COMPETENCES ARE DEFINED UNDER ARTICLE 82 OF LAW 83/2017,
OF 18 AUGUST.

The Financial Intelligence Unit is the national central unit with competence to receive, analyze and disseminate information on suspicions of money laundering or terrorism financing.

The Financial Intelligence Unit has, amongst others, the competence to produce operational and strategic analysis reports.

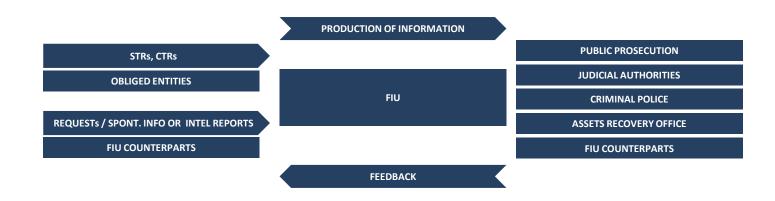
In view of the powers conferred on tax-related offences, the FIU hosts the Liaison Standing Group, which is composed of officials of the Tax and Customs Authority.

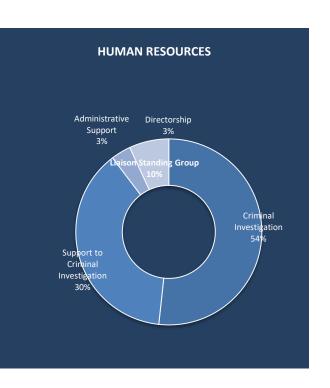
The Suspicious Transaction Reports from the obliged entities must be simultaneously sent to both the FIU through the email address <u>uif.comunicacoes@pj.pt</u>, and to the Investigation and Public Prosecution Central Department (DCIAP), through <u>uai.dciap@pgr.pt</u>.

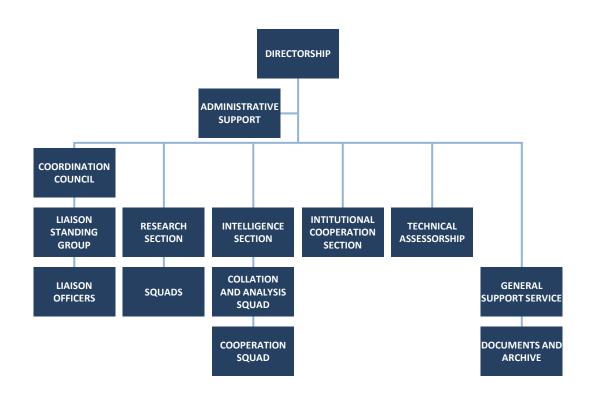
Within the framework of the analysis of suspicious and/or threshold transaction reports, the FIU shall relate to the DCIAP, with whom it exchanges information, including through the preparation of operational analysis reports.

Requests for information received from the competent authorities are covered by Law 54/2021 of 13 August.

It is up to the FIU to provide feedback on the suspicious transaction reports received (the result of the analysis and the respective forwarding).







IN 2024 A TOTAL OF 18628

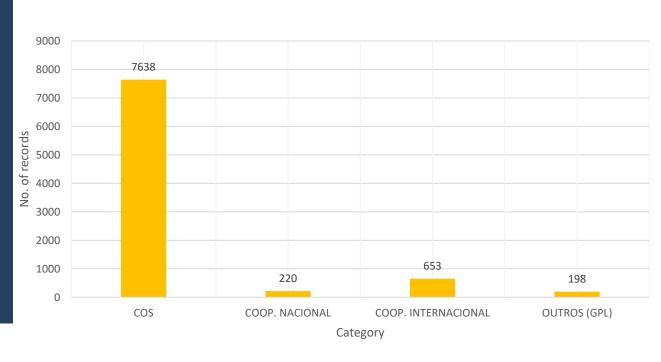
DOCUMENTS WERE RECEIVED,
INCLUDING STRs, COOPERATION
REQUESTS, BOTH NATIONAL AND
INTERNATIONAL, AND OTHERS.
THIS REPRESENTS A SIGNIFICANT
INCREASE COMPARED TO 2023:
+ 24,66%

#### EVOLUTION OF THE No. OF RECORDS RECEIVED

| Year | Nº of records created | % Increase |
|------|-----------------------|------------|
| 2012 | 2154                  |            |
| 2013 | 2868                  | 33,15      |
| 2014 | 3473                  | 21,09      |
| 2015 | 4533                  | 30,52      |
| 2016 | 5865                  | 29,38      |
| 2017 | 6663                  | 13,61      |
| 2018 | 7600                  | 14,06      |
| 2019 | 9572                  | 25,95      |
| 2020 | 9140                  | -4,51      |
| 2021 | 11167                 | 22,18      |
| 2022 | 13390                 | 19,91      |
| 2023 | 14943                 | 11,60      |
| 2024 | 18628                 | 24,66      |

DURING 2024, THE REPORTS SHOWN IN THE TABLE WERE ANALYSED.

#### Records analysed in 2024



#### REPORTS ANALYSED – BY SECTOR

IN 2024, A TOTAL OF 7.638
SUSPICIOUS TRANSACTION
REPORTS WERE ANALYSED BY
THE FIU, SUBMITTED BY
ENTITIES OF ALL THE OBLIGED
SECTORS.

# Breakdown by Sector 7000 6462 6000 5000 No. of records 4000 3000 2000 897 1000 278

Sector

**Entidades Auxiliares** 

Não Financeiro

Financeiro

**Outras Entidades** 

# REPORTS ANALYSED – BY TYPE OF ENTITY

IN 2024, A TOTAL OF 7.638
SUSPICIOUS TRANSACTION REPORTS
WERE ANALYSED BY THE FIU,
SUBMITTED BY ALL THE
OBLIGED ENTITIES

| TYPE OF ENTITY                                | Total |
|---|-------|
| Obliged entities or equivalent                | 7268  |
| Financial                                     | 6404  |
| Non-Financial                                 | 864   |
| Sectoral, Supervision and Control Authorities |       |
| Financial                                     | 58    |
| Non-Financial                                 | 33    |
| Auxiliary entities                            | 278   |
| Other entities                                | 1     |
| Total   | 7638  |

## REPORTS ANALYSED – FINANCIAL SECTOR

IN 2024, 7.638 STRs WERE ANALYSED,

AND AS FAR AS FINANCIAL

INSTITUTIONS ARE CONCERNED,

THE NUMBER WAS 6.404

| Type of Entity   | No.  |
|--|------|
| Portuguese Treasury and Debt Management Agency- IGCP, EPE.                               | 14   |
| Banks  | 3783 |
| Central and Cooperative Agricultural Banks   | 743  |
| Savings Banks  | 279  |
| Insurance companies  | 5    |
| Entities managing Pension Funds  | 1    |
| Entities providing postal services relating to financial products available on their own | 21   |
| Offices of payment institutions located in the EU  | 13   |
| Credit institutions  | 9    |
| EU Credit institutions with a free regime for services providing                         | 26   |
| Electronic currency institutions   | 18   |
| EU Electronic currency institutions with a free regime for services providing            | 10   |
| Payment institutions   | 122  |
| Payment institutions located in the EU with a network of agents                          | 1165 |

# REPORTS ANALYSED – FINANCIAL SECTOR (CONT.)

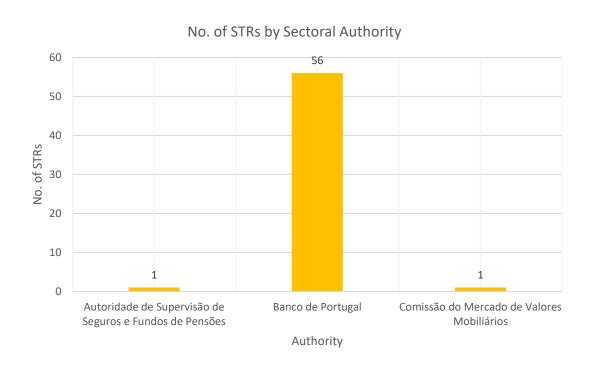
BREAKDOWN BY TYPE
OF FINANCIAL ENTITY.

| Type of Entity (continuation)   | No.  |
|---|------|
| EU Payment institutions with a free regime for services providing             | 2    |
| Financial credit companies  | 8    |
| Financial brokers registered in Portugal                                      | 17   |
| Other companies (subparagraph I, paragraph 1 of article 6 of the RGICSF)      | 8    |
| Other financial brokers except insurance and companies managing pension funds | 3    |
| Companies managing Risk capital funds   | 3    |
| Mutual guarantee companies  | 2    |
| Financial brokerage companies   | 1    |
| Financial credit companies  | 3    |
| Companies managing real estate investment funds                               | 5    |
| Collective investment managing companies                                      | 20   |
| Equity managing companies*  | 4    |
| Branches of credit institutions located in the EU                             | 85   |
| Branches of payment institutions located in the EU                            | 35   |
| Total:  | 6404 |

<sup>\*</sup>The "SGPS" type companies are not obliged entities under Law 83/2017 of 18 August

#### REPORTS ANALYSED — FINANCIAL SECTORAL ENTITIES

AS FAR AS FINANCIAL SECTORAL
AUTHORITIES ARE CONCERNED, 58
STRs WERE SENT, WITH THE CENTRAL
BANK AS THE ENTITY THAT REPORTS
THE MOST.



# REPORTS ANALYSED – NON-FINANCIAL SECTOR

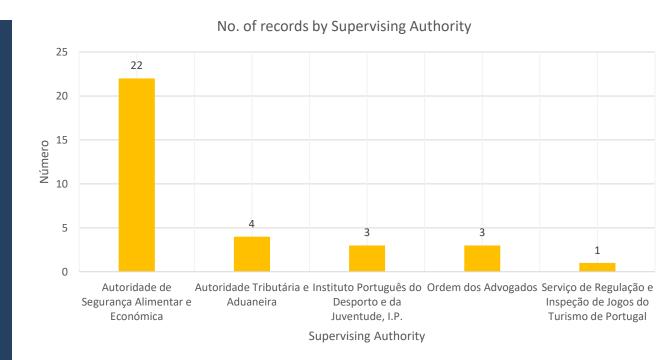
BREAKDOWN OF THE STRs BY TYPE

OF NON-FINANCIAL ENTITIES.

| Obliged Entities or Equivalent                                     | N.º      |
|--|----------|
| Activities with virtual assets                                     | 23       |
| Real estate activities   | 20       |
| High value goods dealers   | 2        |
| Car dealers  | 9        |
| Entities with concessions to exploit games in Casinos and Bingo    | 587      |
| Entities operating under the legal Regime of Online Games and Bets | 119      |
| Entities paying prizes from Bets and Lotteries                     | 24       |
| Notaries   | 73       |
| Statutory auditors   | 7        |
| То   | tal: 864 |

#### REPORTS ANALYSED – NON-FINANCIAL SECTORAL AUTHORITIES

THE SECTORAL AUTHORITIES OF THE NON-FINANCIAL SECTOR ARE PROVIDED FOR UNDER ARTICLE 89 OF LAW 83/2017, OF 18 AUGUST.



# REPORTS ANALYSED – AUXILIARY ENTITIES

FOR UNDER ARTICLE 7 OF LAW 83/2017, OF 18 AUGUST

| TYPE OF ENTITY | No. |
|----------------|-----|
| Registrars     | 276 |
| Total          | 276 |

#### REPORTS ANALYSED – SUPERVISION AUTH. AUXILIARY ENTITIES

THE REGISTRARS AND NOTARIES

PUBLIC INSTITUTE IS THE ENTITY

EQUIVALENT TO SECTORAL

AUTHORITY, UNDER ARTICLE 7,

PARAGRAPH 6, OF LAW 83/2017, OF

18 AUGUST.

| SUPERVISING AUTHORITIES                  | No. |
|--|-----|
| Registrars and Notaries Public Institute | 2   |
| Total                                    | 2   |

## REPORTS ANALYSED – OTHER ENTITIES

UNDER ARTICLE 82, PARAGRAPH 2, SUBPARAGRAPH A) OF LAW 83/2017, OF 18 AUGUST, THE FIU CAN TRIGGER ANALYSIS ON THE BASIS OF OTHER INFORMATION.

| TYPE OF ENTITY              | No. |
|-----------------------------|-----|
| Financial Intelligence Unit | 1   |
| Total                       | 1   |

#### THRESHOLD REPORTS RECEIVED

THE DECREE-ORDER NO. 310/2018,
OF 04 DECEMBER, REGULATES THE
PROVISIONS LAID OUT IN ARTICLE 45
OF LAW 83/2017, OF 18 AUGUST.

As to threshold reports based on decree-law 310/2018, of 4 December, there was an increase of 16,2% in relation to 2023.

Subparagraph a) of the mentioned Decree-order had a decrease of 73,1%, with 12.135 transactions less, whereas subparagraph b), recorded 19.958 transactions more, an increase of 111,2%.

Subparagraph d), with 520 transactions more, displays an increase of 1.106,2%.

| Subparagraph of Art. 2 | No. per item |
|------------------------|--------------|
| a                      | 4473         |
| b                      | 37900        |
| С                      | 4985         |
| d                      | 567          |
| е                      | 21697        |
| f                      | 103          |
| Total                  | 69.725       |

THE ANALYSIS OF THE REPORTS TAKES
INTO ACCOUNT, BESIDES THE REASON
FOR THE SUSPICION RAISED BY THE
REPORTING ENTITY, THE
SUPPLEMENTARY INFORMATION
COLLECTED.

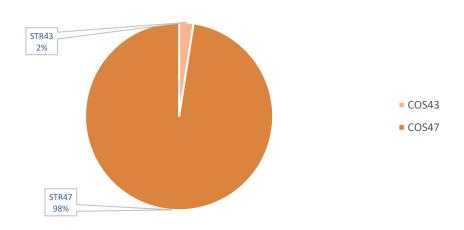
The global information arriving at the FIU comprises suspicious transaction reports, threshold reports, spontaneous disclosures, additional information, dissemination and requests for national and international cooperation.

The whole information is assessed and is enhanced by the addition of judicial, police, financial, administrative and tax-related information, as well as from open sources.

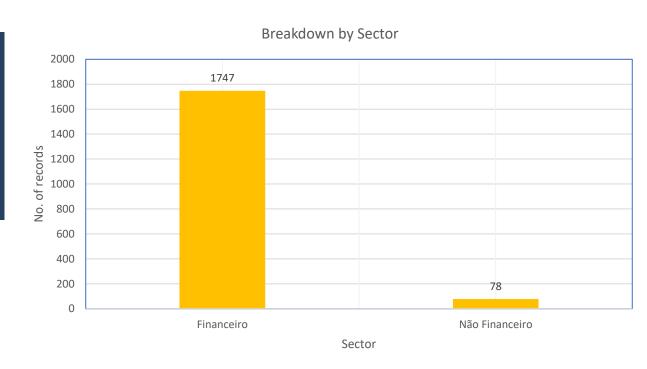
Suspicions that are confirmed (cases where evidence is gathered confirming the initial suspicion) are forwarded to the judicial authorities and the competent criminal police bodies for evaluation and possible prosecution.

In 2024, the FIU analysed a total of 7.638 reports, having confirmed the suspicions in 1.825 of the Suspicious Transactions reports. The majority of the operational analysis concerns reports submitted under article 47 (duty to abstain) of Law No. 83/2017, of 18 August. The Financial Sector represents the largest portion, with 1.747 confirmations, the most prevailing offence being Money laundering.

#### **BREAKDOWN OF THE CONFIRMED ANALYSIS 2024**



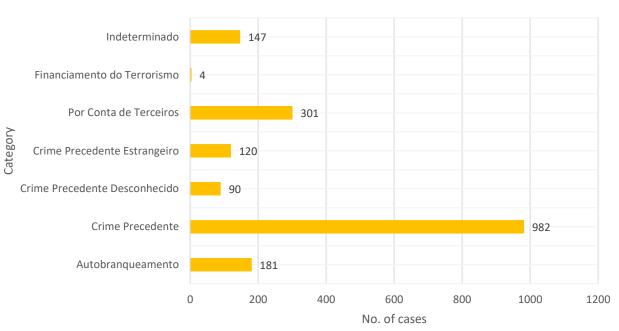
THE NUMBER OF ANALYSIS OF STRs IN WHICH SUSPICIONS WERE CONFIRMED WAS 1825



SUSPICIOUS TRANSACTIONS REPORTS

ANALYSED, AREA ML/TF

#### Breakdown of Money laundering and Terrorism financing Typologies



#### PREDICATE OFFENCES

THE PREDICATE OFFENCES DETECTED ARE BASED ON THE OPERATIONAL ANALYSIS CARRIED OUT.

This indication aims at providing clues for further investigation, while also being an indicator for the competent investigation entities in order to disseminate analysis reports.

Cyber crime is still the most detected predicate offence, followed by economic-financial crime.

The parameter known as "Undefined" reflects the doubts that exist about the predicate crime, and that will be better clarified in possible criminal proceedings.

#### PREDICATE OFFENCES TO MONEY LAUNDERING

IN THE AREA OF PREDICATE OFFENCES
TO MONEY LAUNDERING, COMPUTER
FRAUD STANDS OUT AS THE MOST
PREVALENT, WITH A SIGNIFICANT
INCREASE IN REPORTS, FROM 426 IN
2023 TO 1000 IN 2024.
BY CONTRAST, REPORTS RELATED TO
AGGRAVATED FRAUD DECREASED
FROM 127 IN 2023 TO 43 IN 2024

| REPORTS ANALYSED – MAIN PREDICATE OFFENCES | Nº   |
|--|------|
| COMPUTER AND COMMUNICATIONS FRAUD          | 1000 |
| UNDETERMINED                               | 617  |
| TAX FRAUD                                  | 68   |
| AGGRAVATED FRAUD                           | 43   |
| ILLEGITIMATE ACCESS                        | 18   |
| BREACH OF RESTRICTIVE MEASURES             | 12   |
| MONEY LAUNDERING                           | 11   |
| CRIMINAL GANG                              | 10   |
| COMPUTER CRIME                             | 9    |
| RACKETEERING                               | 8    |
| FORGERY AND COUNTERFEITING OF DOCUMENTS    | 7    |
| OTHER                                      | 6    |
| UNLAWFUL GAMBLING                          | 3    |
| DRUGS TRAFFICKING                          | 3    |
| ECONOMIC FINANCIAL CRIME                   | 2    |
| TAX-RELATED FRAUD                          | 1    |
| PERSONAL FAVORITISM                        | 1    |
| SOCIAL SECURITY FRAUD                      | 1    |
| MISMANAGEMENT OF FUNDS                     | 1    |
| CHILD PORNOGRAPHY                          | 1    |
| UNLAWFUL RESTRAINT                         | 1    |
| TRAFFICKING IN HUMAN BEINGS                | 1    |
| SUBSIDY FRAUD                              | 1    |
| Total                                      | 1825 |

#### TERRORISM FINANCING

TERRORISM FINANCING IS A CONDUCT PROVIDED FOR AND PUNISHED UNDER ARTICLE 5-A OF LAW 52/2003 OF 22 AUGUST, AND IT IS THE RESPONSIBILITY OF THE FIU TO EXAMINE THE SUSPICIOUS TRANSACTION REPORTS AND OTHER SOURCES CONCERNING THE FINANCING OF TERRORISM.

In 2024, 4 analysis concerning the financing of terrorism were confirmed.

#### RESTRICTIVE MEASURES

RESTRICTIVE MEASURES ARE DEFINED

IN LISTS PUBLISHED

AND KEPT BY THE UNITED NATIONS

AND THE EUROPEAN UNION.

The restrictive measures regime is governed by Law 97/2017 of 23 August. In 2022, 111 hits linked to restrictive measures were created, which represented a reduction of 35,1%, with 60 hits less than in 2023.

| No. of events | 2024 |
|---------------|------|
| 111           |      |

#### PROPOSALS FOR FREEZING

THE PROPOSALS FOR FREEZING ARE SUPPORTED BY THE ANALYSIS OF THE TRANSACTION THAT WAS REPORTED, UNDER ARTICLES 43 AND 47 (DUTY TO REFRAIN) OF LAW 83/2017, 18 AUGUST.

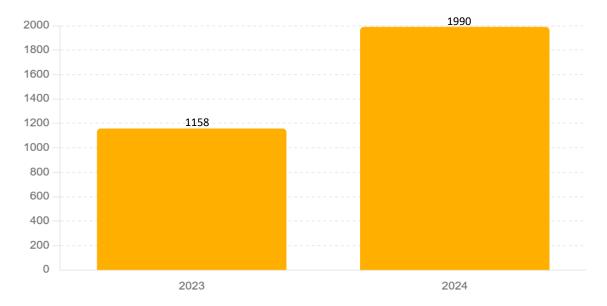
Under the duty to refrain (Article 47 of Law 83/2017 of 18 August 2017), obliged entities shall simultaneously send reports of suspicious transactions to the FIU and the DCIAP, indicating their intention to refrain from carrying out a transaction or a set of transactions, whether present or scheduled and suspected of being associated with illicit funds of or other assets linked to the commission of criminal activities or terrorism financing.

In three working days, the FIU shall give its opinion by means of an operational analysis, proposing or not to suspend the operation, which shall be forwarded to the DCIAP, who is competent to decide, in four days, on the freezing. It is then up to the Criminal Arraignment Court to confirm the freezing, in a time frame of one day.

#### SUSPICIOUS REPORTS RECEIVED – DUTY TO REFRAIN

UNDER THE TERMS OF ART. 47 OF
LAW 83/2017, OF 18 AUGUST,
DESIGNATED AS DUTY TO REFRAIN, A
TOTAL OF 1990 SUSPICIOUS
TRANSACTION REPORTS WERE
RECEIVED AND ANALYSED BY THE FIU

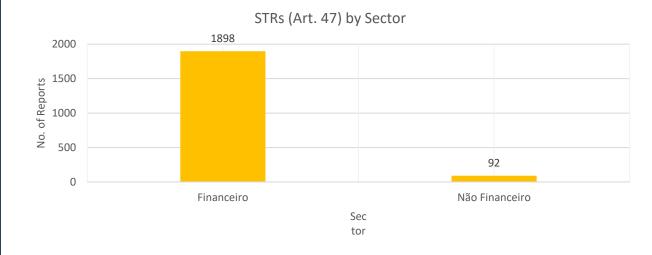
Compared to 2023, there was an increase of 71,84%, with 832 more STRs linked to Art. 47.



#### SUSPICIOUS REPORTS RECEIVED – DUTY TO REFRAIN

UNDER THE TERMS OF ART. 47 OF LAW
83/2017, OF 18 AUGUST, DESIGNATED
AS DUTY TO REFRAIN, A TOTAL OF
1990 SUSPICIOUS TRANSACTION
REPORTS WERE RECEIVED AND
ANALYSED BY THE FIU

The financial sector has contributed with 71,3%, that is 790 more STRs from article 47, and an increase of 84% from the non-financial sector, with 42 more STRs from art. 47.



#### PROPOSALS FOR FREEZING – NUMBERS

THE PROPOSALS FOR FREEZING
ORIGINATE EITHER FROM REPORTS
PURSUANT TO THE DUTY OF
REFRAINMENT (ARTICLE 47 OF LAW
83/2017, OF 18 AUGUST) OR FROM
REPORTING SITUATIONS PURSUANT TO
THE DUTY OF REPORTING (LAW NO.
83/2017, OF 18 AUGUST, ARTICLE 43).

The table below represents the number of cases analysed and the total amounts that were proposed to be frozen.

| No. CASES | EUR            | USD           | XBT- BITCOIN |
|-----------|----------------|---------------|--------------|
| 1397      | 338 442 777,74 | 31 232 250,40 | 1,208883     |

#### STRATEGIC ANALYSIS

PURSUANT TO SUBPARAGRAPH (B) (2)
OF ARTICLE 82 OF LAW No. 83/2017 OF
18 AUGUST, IT IS UP TO THE FINANCIAL
INTELLIGENCE UNIT TO PRODUCE
STRATEGIC ANALYSIS OF TRENDS AND
THREATS IN TERMS OF MONEY
LAUNDERING AND TERRORISM
FINANCING

In 2024, the Financial Intelligence Unit carried out a strategic analysis which identified 350 individuals associated with the opening of bank accounts for the reception and handling of funds of potentially unlawful origin. The report resulting from this analysis was sent to the competent sectoral authority – The Central bank (Banco de Portugal).

At the same time, another strategic analysis was drawn up concerning the establishment of 32 commercial companies and their opening of bank accounts, which could have been used for the reception and circulation of funds deemed to be suspicious, and the analysis of which was sent to the competent sectoral authority – Banco de Portugal.

#### INTERNATIONAL COOPERATION

AS TO INTERNATIONAL COOPERATION,
THERE WAS A SLIGHT INCREASE IN THE
NUMBER OF COUNTERPARTS WITH
WHICH WE EXCHANGED INFORMATION.

The Financial Intelligence Unit has participated, on a regular basis, in several international events, working groups and international organizations, namely the Financial Action Task Force, the Egmont Group, the FIU Platform and the FIU ADVISORY GROUP of the European Union.

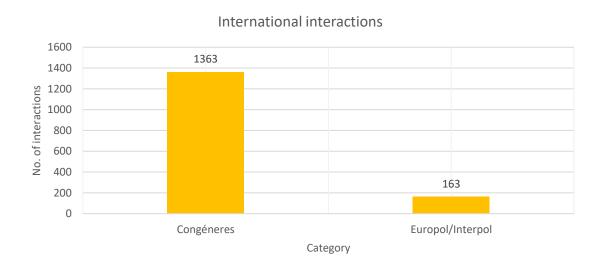
As to the exchange of information with our counterparts, the FIU sent 873 requests for cooperation and disseminations to 56 countries, and received 653 requests from 87 countries, which include 163 mainly from the National Europol Unit and the National Interpol Bureau.

In overall numbers, it represents 1526 exchanges of information, and an increase of 22,87% compared to 2023, which corresponds to 284 more interactions.

# INTERNATIONAL COOPERATION

IN TERMS OF INTERNATIONAL
COOPERATION, THERE WAS A
SIGNIFICANT INCREASE IN THE
NUMBER OF COUNTERPARTS WITH
WHOM WE EXCHANGED
INFORMATION.

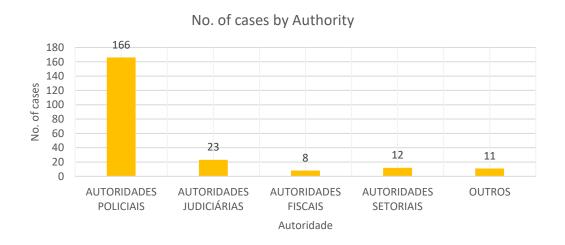
In a total of 1526 exchanges of information, the counterparts with whom the FIU shared most information with were Spain, France, Germany, India, Italy, brazil, Angola and the UK.



# DOMESTIC COOPERATION

THE EXCHANGE OF INFORMATION
WITH NATIONAL ENTITIES IS RULED BY
LAW 54/2021 OF 13 AUGUST.

The requests submitted by national entities to the FIU, in an overall number of 220, originate almost totally from the Units, Directorates and Departments of the Criminal Police, mainly from the National Units and from the Directorate of Lisbon and Tagus Valley. The Judicial authorities also send requests to the FIU, where Portugal also has its representation at the European Prosecutor's Office.

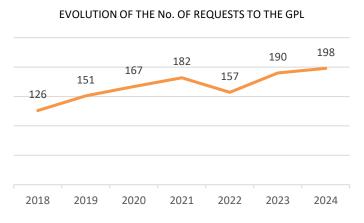


# DOMESTIC COOPERATION

DECREE-LAW NO. 93/2003, OF 30
APRIL, REGULATES THE MANNER, THE
EXTENT AND THE LIMITS OF
COOPERATION BETWEEN THE
CRIMINAL POLICE AND THE TAXES
AUTHORITY.

The Liaison Standing Group (GPL) accesses and carries out the analysis and delivery of the intelligence requested by the competent authorities.

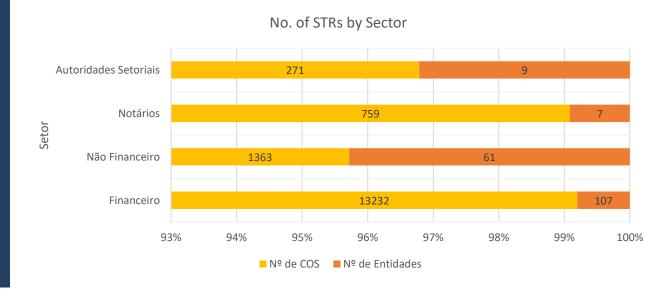
There were 198 requests to the GPL, which means an increase of 4,21% in relation to 2023, with 8 more requests.



# **FEEDBACK**

PURSUANT TO ARTICLE 114 OF LAW
83/2017 OF 18 AUGUST 2017, THE FIU
CARRIES OUT THE FEEDBACK OF
INFORMATION TO THE OBLIGED ENTITIES
AND THE SECTORAL AUTHORITIES ON THE
FORWARDING AND THE OUTCOME OF
SUSPICIOUS REPORTS SUBMITTED UNDER
ARTICLES 43 AND 104.

In 2024 the FIU provided feedback on 15.625 STRs, involving 184 entities.



# DISSEMINATION OF INFORMATION

ACCORDING TO ARTICLE 82, PAR. 1,
SUB-PAR. c) OF THE ML/TF LAW, THE
FIU SHALL BE RESPONSIBLE FOR
DISSEMINATING, AT NATIONAL LEVEL,
INFORMATION RELATING TO THE
ANALYSYS CARRIED OUT AND THE
RESPECTIVE OUTCOME, AS WELL AS
ANY OTHER RELEVANT INFORMATION.

#### National Dissemination of Operational Analysis Reports 1884 2000 1800 1600 1400 of Reports 1200 1000 800 Š. 600 400 173 104 200 0 DCIAP DIAP ΡJ ΑT

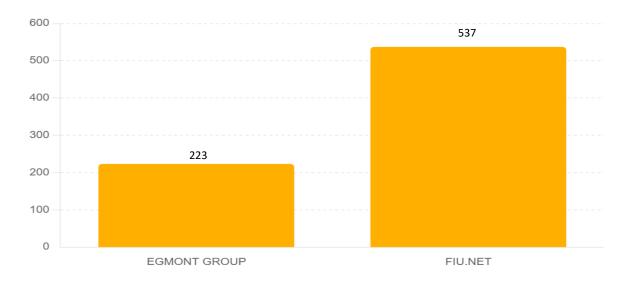
**Entities** 

# DISSEMINATION OF INFORMATION

ACCORDING TO ARTICLE 82, PAR. 1, SUB-PAR. c) OF THE ML/TF LAW, THE FIU SHALL BE RESPONSIBLE FOR DISSEMINATING, AT NATIONAL LEVEL, INFORMATION RELATING TO THE ANALYSYS CARRIED OUT AND THE RESPECTIVE OUTCOME, AS WELL AS ANY OTHER RELEVANT INFORMATION.

#### INTERNATIONAL DISSEMINATION

The FIU disseminated 760 reports through the Egmont Group (71 counterparts), as well as the FIU.NET (27 counterparts).



THE FINANCIAL INTELLIGENCE UNIT
COOPERATES IN TRAINING ACTIONS
AND PARTICIPATES IN SEVERAL
WORKING GROUPS.

The FIU has cooperated with the obliged entities through the sharing of information on new trends, practices and risks identified.

These actions are a part of the cooperation that the FIU establishes with the obliged entities, bearing in mind that they are also required to train their employees.

Moreover, the FIU attends regular and quarterly meetings held by the Coordination Committee for the Money laundering and terrorism financing prevention policies, as well as weekly meetings of the Permanent Secretariat of the said Committee, in the Egmont Group Plenary and the FATF Plenary.

THE FINANCIAL INTELLIGENCE UNIT
COOPERATES IN TRAINING ACTIONS
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LAUNDERING AND TERRORISM
FINANCING.

The FIU is also present in the plenary of the Financial Action Task Force (FATF) and in the meetings of its Working groups, the FIU.Net, among others, in a total of 10 liaison representations.

It also participated in 30 meetings, committees, working groups, conferences, congresses and projects on an international level.

In partnership with the Institute for Management and Public Administration (IGAP) and the Institute for Public Markets, Property and Construction, I.P. (IMPIC, I.P.), the FIU organized and participated in another training/clarification seminar concerning ML/TF with a large number of representatives of the real estate sector.

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### TRAINING AND AWARENESS INITIATIVES

| TRAINING/CLARIFICATION ACTIONS           | DESIGNATION OF THE ACTIONS  | IDENTIFICATION OF THE RECIPIENTS                        |
|--|---|---|
| Mentoring Magistrates<br>Mozambique - TF | Mentoring Magistrates on<br>Investigation and Prosecution<br>Methodologies - TF | Magistrates   |
| Training                                 | Compliance Duties   | IGCP  |
| Training                                 | Compliance duties and Practical cases   | ZURICH  |
| Training                                 | Suspicious Transaction Reports  | IFB / Mutual guarantee<br>companies                     |
| Training                                 | Suspicious Transaction Reports  | IFB / Mutual guarantee companies                        |
| Training/Seminar                         | Preventive duties in the real estate sector                                     | Real estate brokers and other real estate professionals |

TYPES OF PARTICIPATION AND COOPERATION BY THE FIU.

| PARTICIPATION/COOPERATION – FINANCIAL INTELLIGENCE UNIT |   |  |  |
|---|---|--|--|
| Designation of the Liaison (or forum/group)             | Objective of the representation   |  |  |
| Permanent Technical Secretariat                         | Technical support to the Executive Committee of the AML/ATF Coordination Commission |  |  |
| Virtual Community goAML                                 | Present, discuss and aprove functionalities of the goAML platform                   |  |  |
| Executive Committee                                     | Execution of the duties that are assigned to the AML/ATF Coordination Commission    |  |  |
| ENFIN   | PWG Group on Intelligence   |  |  |
| Egmont Group  | International cooperation policies between the FIUs                                 |  |  |
| Anti Fin Ter  | Participation as end-user of terrorism financing detection models on the dark web   |  |  |
| 16th Global Forum Plenary                               | Transparency and tax-related information exchange                                   |  |  |
| Supervision College CGD                                 | Observer status   |  |  |
| FATF  | Member of the Portuguese delegation   |  |  |
| FIUNET  | Admin of the Fiunet users   |  |  |

PARTICIPATION IN MEETINGS,
COMMITTEES, WORKING GROUPS,
FORA, COURSES, CONFERENCES,
CONGRESSES AND PROJECTS ON AN
INTERNATIONAL LEVEL

| Designation of the INTERNATIONAL                    |  |
|---|--|
| Committees, Working Groups, Fora, Courses,          | OBJECTIVE OF THE ACTIVITY  |
| Conferences, Congresses and Projects                |  |
| FATF  | PLENARY  |
| ENFIN Core Group Meeting                            | Annual Activities/Groups   |
| ENFIN PWG on Intelligence                           | Call for proposals on Organised Crime - Internal Security Fund   |
| ENFIN PWG on Intelligence                           | Intelligence Training Project  |
| EU Project on ML/FT Correspondent Banking (EU COBA) | Working group Experts Meeting of the EU COBA Project Team  |
| ENFIN On The Move IV                                | Training   |
| FATF  | Plenary  |
| EGMONT GROUP  | Plenary  |
| Information Exchange                                | Information Exchange with FIU Morocco  |
| EGMONT GROUP  | Plenary  |
| AMON  | Annual General Assembly  |
| FATF  | Plenary  |
| FIU PLATFORM  | Annual Meeting   |
| UNODC   | Experts meeting on the dismantling of professional networks of ML and Virtual assets                       |
| GLOBAL COALITION FIGHT FINANCIAL CRIME              | Conference   |
| FATF  | FAFT evaluation Course   |
| Egmont Group  | Europe 1 HoFIU Meeting - AMLA  |
| GOAML   | User Group Meeting   |
| FATF  | Plenary  |
| Gandalf Project                                     | Collation of the intelligence gathered within the framework of ML/TF prevention against financial fraud $$ |
| ENFIN Core Group Meeting                            | Annual conference  |
| FIU PLATFORM  | Meeting  |
| SUSTRANS  | Annual meeting   |
|   |  |

PARTICIPATION IN MEETINGS,
COMMITTEES, WORKING GROUPS,
FORA, COURSES, CONFERENCES,
CONGRESSES AND PROJECTS ON AN
INTERNATIONAL LEVEL

| Designation of the National Committees,<br>Working Groups, Fora, Courses and Projects         | OBJECTIVE OF THE ACTIVITY  |
|---|--|
| Forum of the Central Bank for the prevention against Money laundering and Terrorism financing | Guidelines on Money laundering, the financing of terrorism and of the proliferation of weapons of mass destruction |
| Forum of the Central Bank for the prevention against Money laundering and Terrorism financing | Digital Fraud  |
| Meeting with the Europena Commission (Visit to Portugal)                                      | Ongoing penal execution, control and investigations linked to the application of restrictive measures in Portugal  |
| Compliance Week BPI   | Terrorism financing – Risk in Portugal   |
| Executive Committee of the AML/ATF Coordination Commission                                    | Management of the AML/ATF Coordination Commission  |
| Technical secretariat of the AML/ATF Coordination Commission                                  | Functioning of the AML/ATF Coordination Commission   |
| Beneficial Owners Central Registry  | Transposition of the European Regulation and Directives and creation of a Government Bill                          |
| Supervision College CGD   | Follow-up and observation of the CGD Group on ML/TF Prevention   |

# DISSEMINATION OF INFORMATION

THE FINANCIAL INTELLIGENCE UNIT

HAS A WEBSITE ON THE INTERNET

FOR THE DISSEMINATION OF

ITS ACTIVITIES.

The Financial Intelligence Unit has a website on the Internet, acessible at <a href="https://uif.policiajudiciaria.pt">https://uif.policiajudiciaria.pt</a>, which recorde a total of 77.046 visits until the end of 2024. Among the most visited sections, the new Portal STR/goAML is one of the most visited, currently in test mode.

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