

FINANCIAL INTELLIGENCE CENTRE, GHANA



2018  

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ANNUAL  
REPORT



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REPORT

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## FOREWORD BY BOARD CHAIRMAN

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In 2018, the FIC positioned itself to lead the country to address the identified deficiencies in its Second Round of Mutual Evaluation Report.

As part of the measures to demonstrate that Ghana is responding to the issues identified by the Assessment team, a delegation led by the FIC participated in the Plenary Meetings of the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA).

Financial sector regulators (Bank of Ghana, Securities and Exchange Commission and National Insurance Commission) began the development of an Administrative Sanctions document to penalize Accountable Institutions (Reporting Entities) for infractions on AML/CFT obligations. The FIC also expanded its sensitization to the Law Enforcement Agencies (LEAs), the Judiciary and some DNFBPs cross the country.

In order to enhance its reporting and receipt of mandatory reports, the FIC acquired the go-AML software. This software enhanced the quality of reports filed by accountable institutions to the FIC thereby increasing the number of reports in the year under review.

Looking at the work of the FIC, I am hopeful that the commitment of the Government contributed immensely towards these achievements.

**DCOP Opare Addo**  
Board Chairman



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## MESSAGE FROM THE CEO

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Our successes can be attributed to the fulfillment of our mission to protect the Ghanaian economy from the scourge of Money Laundering and Terrorist Financing (ML/TF) and for the enhancement of national and global economic stability and growth. The vision of the FIC is to enable an economically strong Ghana free of the destructive effects of money laundering, terrorist financing and other transnational financial crimes.

2018 was eventful as the FIC was to respond to calls by the Financial Action Task Force (FATF), the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) and other international and domestic stakeholder institutions to adopt measures to address deficiencies within its AML/CFT regime.

Following the adoption of the Second Round of Mutual Evaluation Report in May 2017, Ghana was placed on Enhance Follow up Process (a yearly reporting process) and was expected to submit its first Follow-up Report to GIABA on corrective measures put in place to demonstrate effectiveness of its AML/CFT. The Enhanced Follow-up Process automatically required that Ghana be placed under the monitoring/observation of the FATF for one year from June 2017 to June 2018.

In addition, the FIC continued to implement the recommendations of the Mutual Evaluation Report and reviewed the National Risks Assessment Report to include emerging risk areas such as the extractive industry, cocoa sector and the hotel industry.

The FIC conducted a number of AML/CFT training and sensitization workshops/programmes for Accountable Institutions including Insurance companies, Capital Market Operators, Banks and Non-Bank Financial Institutions. Training programmes were also conducted for the Designated Non-Financial Businesses and Professions (DNFBPs); Car Dealers, Real Estate Developers, Precious Mineral dealers, Operators of Games of Chance, Religious Bodies and NGOs.

During the period, the Bank of Ghana approved its Administrative Sanctions document and began the implementation of its AML/CFT sanctions regime. The NIC and SEC also developed same pending approval. The Registrar General's Department also began the roadmap to implement the Beneficial Ownership Register.

With the support of the UNODC, the FIC installed and deployed the go-AML software as an efficient platform for the receipt of Suspicious Transaction Reports (STRs), Electronic Currency Transaction Reports (ECTRs) Cash Transactions Reports (CTRs) and other statutory reports on AML/CFT from the Accountable Institutions.

Currently, there is a deepened collaboration among the FIC, the Regulators, LEAs and competent authorities on how the various industries and government can focus the limited resources on areas posing high ML/TF risk to the country.

Staff of the FIC benefited from workshops organized by GIABA under the Strengthening Action against Money Laundering in West Africa (SAMWA) Project on Strategic Analysis and Information Security.



Ghana's term of the Presidency of ARIN-WA (Asset Recovery Inter-Agency Network, West Africa) also ended in November 2018 at its 5<sup>th</sup> Annual General Meeting in Cotonou, Benin. The meeting adopted among others the operational situation of the permanent Secretariat, funding of the network, provision of a platform of emerging legislations in the identification of criminal assets and the establishment of Asset Management Offices (AMOs) in member States.

On the international front, the FIC requested for and exchanged information on a timely basis with foreign jurisdictions through the Egmont Secured Web (ESW) platform to further ML/TF investigations. The FIC participated in the Egmont Centre for Excellence and Leadership meetings which, among other things considered appropriate measures to continuously build capacity of FIUs around the globe. The FIC also participated in FATF and GIABA Plenary Meetings where best practices were discussed and shared among member States.

In conclusion, I wish to extend warm appreciation to stakeholders, Board, Management and Staff of the Centre for their efforts in contributing to the success of the Centre.

I look forward to strengthening our mutual cooperation with stakeholders including the Private Sector and the General Public in the fight against AML/CFT.

**Kwaku Dua**  
CEO, FIC.



<b>ABBREVIATION</b>	<b>MEANING</b>
Als	Accountable Institutions
AML	Anti-Money Laundering
AMLRO	Anti-Money Laundering Reporting Officer
ARIN-WA	Asset Recovery Inter-Agency Network for West Africa
BNI	Bureau of National Investigation
BoG	Bank of Ghana
BSD	Banking Supervision Department
CDD	Customer Due Diligence
CEO	Chief Executive Officer
CFT	Combating the Financing of Terrorism
CID	Criminal Investigations Department
MOs	Market Operators
CTR	Cash Transaction Report
DNFBPs	Designated Non-Financial Businesses and Professions
ECTR	Electronic Currency Transaction Report
EOCO	Economic and Organised Crime Office
FATF	Financial Action Task Force
FIC	Financial Intelligence Centre
FIU	Financial Intelligence Unit
GIABA	Inter-Governmental Action Group against Money Laundering in West Africa
GPS	Ghana Police Service
GRA	Ghana Revenue Authority
GREDA	Ghana Real Estate Developers Association
ICT	Information Communication Technology
ID	Identity Card
IMF	International Monetary Fund
IRs	Intelligence Reports
KYC	Know Your Customer
LEAs	Law Enforcement Agencies
LECOB	Law Enforcement Coordinating Bureau
MER	Mutual Evaluation Report
MoJAG	Ministry of Justice and Attorney General
MOU	Memorandum of Understanding
NACOB	Narcotics Control Board
NBFIs	Non-Bank Financial Institutions
NIC	National Insurance Commission
NRA	National Risk Assessment
NSCS	National Security Council Secretariat
OFISD	Other Financial Institutions Supervision Department
PEP	Politically Exposed Person
PN	Personality Note
SEC	Securities and Exchange Commission
SOP	Standard Operating Procedure
STR	Suspicious Transaction Report
UNODC	United Nations Office on Drugs and Crime



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## 1. ABOUT THE FIC

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In line with the FATF Recommendation 29, countries are to set up a national centre for the receipt and analysis of suspicious transactions reports. Accordingly, section 4 of the Anti-Money Laundering Act 2008, (Act 749) as amended provides for the establishment of the Centre. The FIC is a body corporate with perpetual succession and can sue and be sued.

### **Vision Statement**

An economically strong Ghana free of the destructive effects of Money Laundering, Terrorist Financing and other transnational financial crimes

### **Mission Statement**

To protect the Ghanaian economy from the scourge of money laundering and terrorist financing and for the enhancement of global and national stability and growth.

### **Core Values**

- Confidentiality
- Integrity
- Team Spirit
- Professionalism
- Accountability

### **Functions of the Centre**

To achieve our mandate, the Centre shall perform the following functions;

- Request, receive, analyse, interpret and disseminate information concerning suspected proceeds of crime and terrorist property, as provided under the Act or any other law.
- Take measures that are necessary for the enforcement of the United Nations Consolidated Lists,
- Monitor and give guidance to accountable institutions, supervisory bodies and other persons in the discharge of their duties and in their compliance with the Act,
- Co-ordinate and supervise activities of the investigation and suppression of money laundering, terrorist financing, and financing of the proliferation of weapons of mass destruction or other transnational organized crime,
- Co-ordinate with the Ghana Revenue Authority to ensure compliance of the Act by Designated Non-Financial Businesses and Professions,
- Retain the information in the manner and for the period required under this Act; and
- Inform, advise and co-operate with investigating authorities, supervisory bodies, the revenue agencies, the intelligence agencies and foreign counterparts.





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## 2. STAKEHOLDERS OF THE AML/CFT & P REGIME

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### Domestic Collaboration

Consistent with FATF Recommendation 2, the FIC has enhanced collaborations with domestic stakeholders.

During the period under review, the FIC received a number of requests from Law Enforcement Agencies on financial information to assist in conducting parallel investigations, security checks among others.

Below is the breakdown of Correspondence between January and December, 2018.

NAME	REQUESTS RECEIVED	RESPONSES SUBMITTED
GPS	372	297
EOCO	145	111
BNI	267	27
OTHER STAKEHOLDERS	100	26
<b>TOTAL</b>	<b>884</b>	<b>461</b>

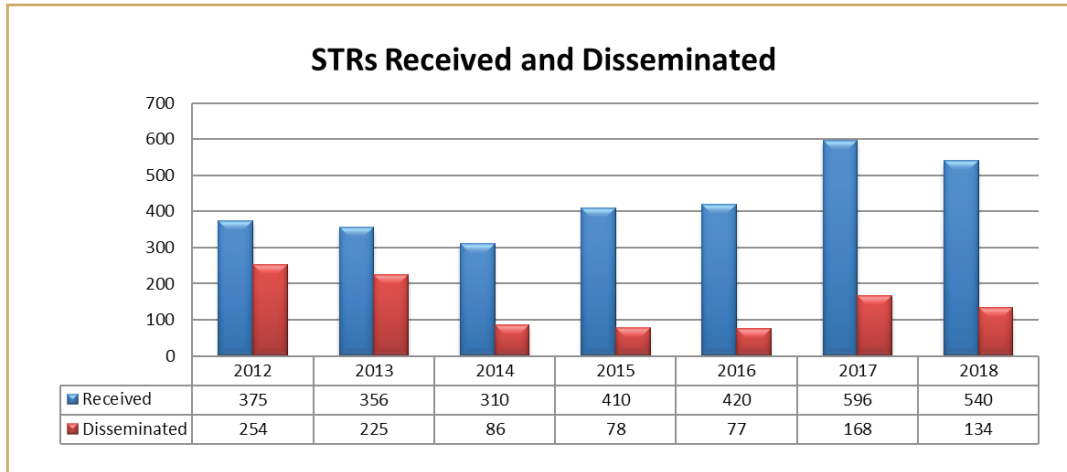
The difference between the requests received and responses submitted explains some delays the Centre experienced in receiving financial information from some Accountable Institutions. With the introduction of an Administrative Sanctions regime, the Centre in collaboration with all the regulators would penalize institutions for AML/CFT non-compliance.



### 3. OPERATIONAL ACTIVITIES

#### Tactical analysis

#### Analysis of STRs received and disseminated



An analysis of the STR summary table shows that over the last seven (7) years, the total number of STRs received was three thousand and seven (3,007). Only one thousand and twenty-two (1,022) were disseminated to Law Enforcement Agencies for investigations during the period under review.

Over the period (2012-2018), both STRs received and disseminated witnessed a steady decline from 2012 to 2014 as indicated above. The disseminated figures further declined in 2015 and 2016 due to the repatriation of funds that were fraudulently obtained by subjects to unsuspecting victims in various jurisdictions by the Centre. The receipt of STRs saw a steady rise from 2015 to 2018 which could be attributed to the influx of criminal activities in our sub-region.

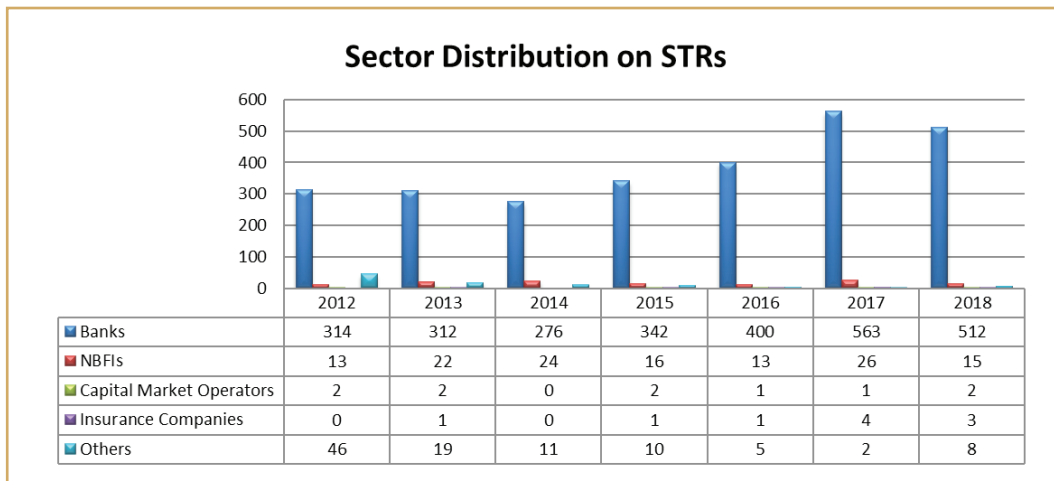
Summary of actions taken on STRs		
Action Taken	Frequency	Comments
Disseminated	134	LEAs to take further action
Funds Returned	223	Funds returned owing to unsatisfactory CDD
Funds Recalled	58	Remitters recalled funds on grounds of fraud, unclear business transactions etc.
Western Union and MoneyGram related cases referred to Service providers	163	Western Union and MoneyGram to take action
Reports placed on monitoring	167	Insufficient information
Reports requiring no further action	61	No identifiable predicate offences
Further intelligence being gathered on reports	67	Awaiting further information from foreign counterparts
Inactionable Reports	9	Bad reports
<b>Total Reports</b>	<b>540</b>	



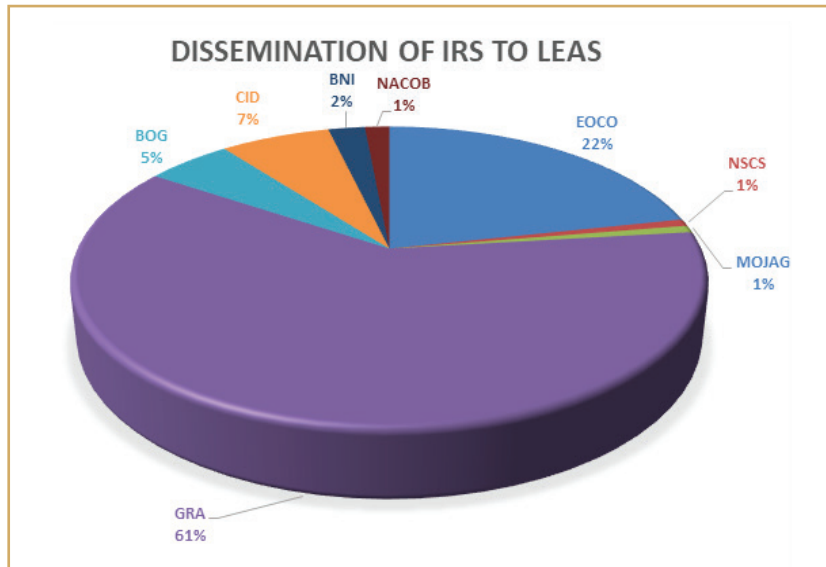
In 2018, one hundred and thirty-four (134) Intelligence Reports (IRs) were disseminated to relevant LEAs for further action. Two hundred and twenty-three (223) were returned to various remitters through their respective remitting banks on grounds of fraud. In some instances, relevant Embassies and Consulates were notified and asked to advise their citizenry to be cautious of the techniques of the criminals. A further fifty-eight (58) were cases in which funds were recalled by the remitters through their remitting banks on several grounds including fraud and unclear business transactions. One hundred and sixty-three (163) reports were cases referred to Money and Value Transfer Services (MVTs) such as the Western Union and MoneyGram for further action.

One hundred and sixty-seven (167) reports lacked sufficient information that could trigger investigation by relevant Law Enforcement Agencies and were therefore placed on monitoring by the Centre.

Also, sixty-one (61) reports did not have clear and identifiable predicate offences for further action to be taken. The Centre is awaiting further information on sixty-seven (67) reports from our foreign counterparts. Lastly, nine (9) reports were classified as inactionable due to the inappropriate narration by the reporting entities. The Centre further identified these institutions and directed them to train their Compliance Officers to file quality and actionable reports.



Over the period (2012-2018), the mainstream banks continued to be the leading sector in the filing of STRs. 2014 saw a decrease, however, the successive years saw significant increases. The NBFIs, Others, Capital Market Operators and the Insurance Companies followed in that order. This was again chalked by the intensive sensitization and continuous awareness creation programmes on the need to file STRs to the Centre.



In 2018, sixty-one percent (61%) of Intelligence Reports were disseminated to the Ghana Revenue Authority (GRA) for tax purposes. Twenty-two percent (22%), seven percent (7%), five percent (5%), two percent (2%), one (1%), and one percent (1%) were disseminated to EOCO, CID, BOG, BNI, NSCS, NACOB and MOJAG respectively.

This could be suggestive of high tax crimes in the jurisdiction and also depicts effective collaboration among the Law Enforcement Agencies in the fight against ML/TF and Proliferation.

### REGIONAL DISTRIBUTION OF ML/TF & P (2018)





In 2018, 73.47% of the total number of STRs were received from the Greater Accra Region. Nine-percent (9.47%), 5.75%, 4.45%, 2.04%, 1.67%, 1.67%, 1.31%, and 0.19% were received from the Ashanti, Northern, Central, Brong Ahafo, Eastern, Western, Volta and the Upper East Regions respectively, depicting among others, higher percentages of Money Laundering. This may be due to the cosmopolitan nature of cities and the influx of foreigners involved in various kinds of recorded criminal activities .

**TOTAL INFLOWS AND RETURNED FUNDS FOR 2018**



In 2018, the total remittances received from STRs amounted to US\$181,825,768.82. The Centre returned US\$7,105,414.90 to respective remitters. These were due to unsatisfactory due diligence by financial institutions, recall of funds by some remitters and unjust enrichment of subjects, among others.

**CASH TRANSACTION REPORTS (CTRs) AND ELECTRONIC CURRENCY TRANSACTION REPORTS (ECTRs)**

During the period under review, the Centre received and reviewed One million six hundred and twenty-six thousand, one hundred and thirty (1,626,130) Cash Transaction Reports (CTRs) and nine hundred and eighty-six thousand, two hundred and seventy-seven (986,277) Electronic Currency Transaction Reports (ECTRs).

Below is a breakdown of CTRs and ECTRs received from January to December 2018.

INSTITUTION	CTRs	ECTRs
Banks	1,626,130	986,277
Savings & Loans Companies	5,503	
Rural /Community Banks (RCBs)	10,378	
<b>Total</b>	<b>1,642,011.00</b>	<b>986,277</b>

Issues identified in the CTRs during the period under review included the following:

- Some mandatory fields of the CTRs were not completed by some Accountable Institutions.
- Some of the fields requiring numbers were filled with letters thereby rendering the reports inappropriate for review.



That notwithstanding, the FIC experienced late receipts of CTRs and ECTRs from some Accountable Institutions, particularly some banks and NBFIs. Consequently, the Centre cautioned these non-compliant institutions to desist from the late submission of reports else risk being sanctioned for non-compliance by their regulators.

### Currency Declaration Reports (CDRs)

One hundred and six (106) Currency Declaration Forms were received from the Customs Division of the Ghana Revenue Authority in line with the Foreign Exchange Act and the Bank of Ghana Directive. The FIC reviewed these forms and advised relevant stakeholders on the importation of currencies from their jurisdictions to the country by some suspected criminals.

#### Below is a breakdown of currencies declared in 2018

Currency	Total Amounts
USD	2,521,545.00
GBP	13,600.00
Euro	50,657.00
CFA	17,428,413.81

### Cloned Cheques Report

In 2018, the Centre received twenty-one (21) cloned cheque reports from financial institutions.

The table below shows the breakdown of the Cloned Cheques Report.

	1 <sup>st</sup> Quarter	2 <sup>nd</sup> Quarter	3 <sup>rd</sup> Quarter	4 <sup>th</sup> Quarter	Total
No. of cloned cheques	18	4	5	1	28
Total Amt of GH¢ cheques	1,595,160	949,963	3,049,180	2,000	5,596,303
Total amt of USD cheques	-	-	-	-	-
Total amt of GBP cheques	-	-	-	-	-
No. of successfully cashed cheques	7	-	2	-	9
Total amt of successfully cashed cheque (GH¢)	52,350	-	43,800	-	96,150

### STRATEGIC ANALYSIS

The Interpretative Note to FATF Recommendation 29, requests that FIU analysis should add value to the information received and held by the FIU. It further indicates that the FIU should conduct the following types of analysis: Operational analysis and Strategic analysis. Strategic analysis uses available and obtainable information, including data that may be provided by other competent authorities, to identify money laundering and terrorist financing related trends and patterns. This information is also used by the FIU or other state entities in order to determine money laundering and terrorist financing related threats and vulnerabilities.



Strategic analysis may also help establish policies and goals for the FIU, or more broadly for other entities within the AML/CFT regime.

Accordingly, Regulation 40 (f)(g) of the Anti-Money Laundering Regulations, 2011 (L.I 1987) obligates the Centre to provide Accountable Institutions with feedback which includes information on current risks, trends and methods of ML/TF and examples of actual ML cases that occurred in the country.

The Centre receives disclosures from Accountable Institutions as well as information from other sources. These disclosures and information are analysed for risks, trends, patterns and other links indicative of ML/TF. The outcome of this analysis may be shared with domestic law enforcement agencies, policy makers and relevant stakeholders in the fight against ML/TF.

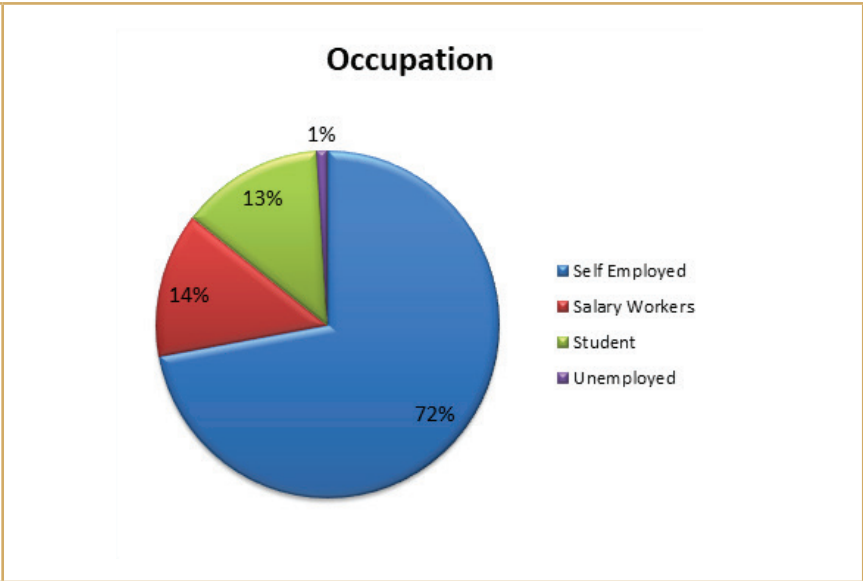
The table below illustrates the strategic analysis of IRs received in 2018

**Risks, Trends and Methods from IRs analysis**

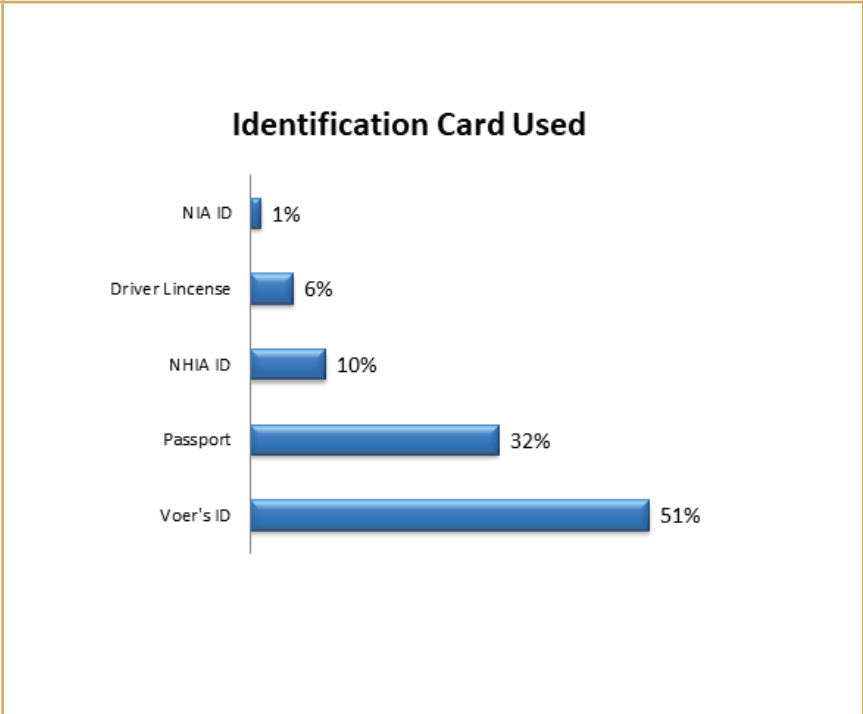
Comments/Analysis	Pictorial View																																	
<p>During the period under review, five hundred and forty (540) Suspicious Transactions Reports (STRs) were filed to the Centre. Out of this number, one hundred and thirty-four (134) were disseminated as Intelligence Reports (IRs) to Law Enforcement Agencies.</p>	<p style="text-align: center;"><b>Total STRs Received &amp; Disseminated</b></p> <table border="1"> <caption>Total STRs Received &amp; Disseminated (2009-2018)</caption> <thead> <tr> <th>Year</th> <th>Received</th> <th>Disseminated</th> </tr> </thead> <tbody> <tr><td>2009</td><td>1</td><td>1</td></tr> <tr><td>2010</td><td>71</td><td>25</td></tr> <tr><td>2011</td><td>137</td><td>57</td></tr> <tr><td>2012</td><td>375</td><td>254</td></tr> <tr><td>2013</td><td>356</td><td>225</td></tr> <tr><td>2014</td><td>310</td><td>86</td></tr> <tr><td>2015</td><td>410</td><td>78</td></tr> <tr><td>2016</td><td>420</td><td>77</td></tr> <tr><td>2017</td><td>596</td><td>168</td></tr> <tr><td>2018</td><td>540</td><td>134</td></tr> </tbody> </table>	Year	Received	Disseminated	2009	1	1	2010	71	25	2011	137	57	2012	375	254	2013	356	225	2014	310	86	2015	410	78	2016	420	77	2017	596	168	2018	540	134
Year	Received	Disseminated																																
2009	1	1																																
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2018	540	134																																
<p>Out of the 134 Intelligence Reports disseminated, 87% of the subjects were Ghanaians, 6% Nigerians, the Indians and Lebanese representing 2% each. The others were Cameroonians, Canadians, and Ivoirians represented by 1% each.</p>	<p style="text-align: center;"><b>Nationality</b></p> <table border="1"> <caption>Nationality of Subjects in Disseminated IRs</caption> <thead> <tr> <th>Nationality</th> <th>Percentage</th> </tr> </thead> <tbody> <tr><td>Ghana</td><td>87%</td></tr> <tr><td>Nigeria</td><td>6%</td></tr> <tr><td>India</td><td>2%</td></tr> <tr><td>Lebanon</td><td>2%</td></tr> <tr><td>Cameroon</td><td>1%</td></tr> <tr><td>Canada</td><td>1%</td></tr> <tr><td>Ivory Coast</td><td>1%</td></tr> </tbody> </table>	Nationality	Percentage	Ghana	87%	Nigeria	6%	India	2%	Lebanon	2%	Cameroon	1%	Canada	1%	Ivory Coast	1%																	
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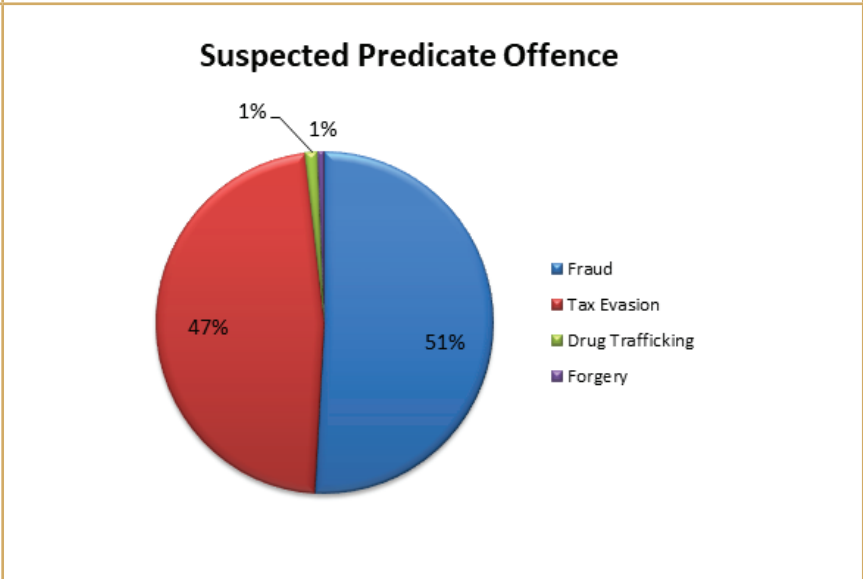
The occupations of subjects of the IRs were represented as seventy-two per cent (72%) self-employed, fourteen per cent (14%) salary workers, thirteen per cent (13%) students and one per cent (1%) unemployed.



Identification documents used by subjects were passport, voters' identification cards, Driver's Licence, National Health Insurance Scheme Identification Cards (NHIS) and the National Identification Authority (NIA) card. Voter's IDs and Passports constituted 51% and 32% respectively. Other documents used were the NHIS card, the Driver's Licence, and the National Identification card (NIA) which accounted for 10%, 6% and 1% respectively.



The predicate offences recorded during the period were fraud, tax evasion, forgery and drug trafficking. Fraud had the highest representation of fifty-one per cent (51%), followed by tax evasion with forty-seven per cent (47%). Forgery and drug trafficking each recording one per cent (1%).

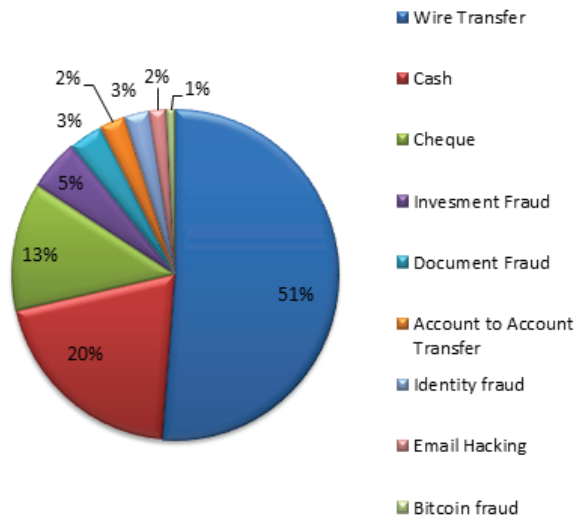






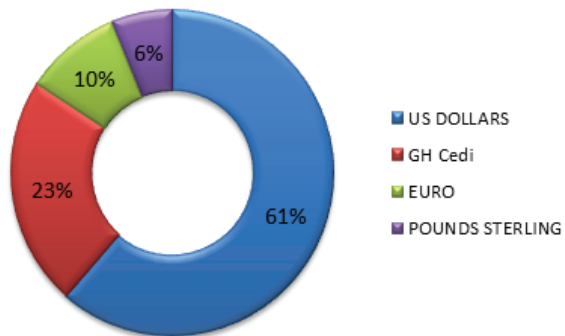
The Technique/instruments used to perpetrate Money Laundering activities during the period were cash, cheques, wire transfers, account to account transfer, investment fraud, email hacking, identity fraud, document fraud, and bitcoin fraud. The distribution is as follows; 51% wire transfer, 20% cash, 13% cheque, and 5% investment fraud. Document fraud and identity fraud were both represented by 3% each. Also, account to account transfer and email hacking were each represented by 2%. Bitcoin fraud was represented 1%.

### Technique/Instrument Used



The currency which was frequently used during the period was the United States Dollar (USD) constituting 61%, Ghana Cedi, Euros and the Pounds Sterling accounted for 23%, 10% and 6% respectively.

### Currency frequently Used





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## TYOLOGY

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A typology can be said to be the classification of the various schemes and techniques used to perpetuate money laundering offences / activities recorded in the country during a period of time. For instance, under investment fraud there are several schemes including Ponzi schemes, investments offering outrageous interest rates among others.

### **An Example of Investment Fraud Scheme**

On October 7, 2017, the FIC received an STR from an Investment Company R for fraudulent transactions involving Ms. F and her Investment Broker W.

Ms. F made an investment with Investment Company R through Investment Broker W. On April 24, 2017, Ms. F made a fixed deposit of GH¢10,000.00 and GH¢54,000.00 with Investment Company R and withdrew all the funds after a number of rollovers. On July 6, 2019, a representative of Ms. F approached Company R and presented investment certificates purportedly issued by Company R. During investigations, Company R observed that some of the documents presented by the representative of Ms. F were forged.

Further intelligence revealed that, Ms. F had earlier contacted Company R to confirm whether the funds were with Broker W or the Investment Company R. Mr. T, a staff of Broker W misrepresented himself as a staff of Investment Company R to Ms. F. The matter is being investigated by the regulator.

### **Indicators/redflags**

1. Use of forged and misleading disclosure documents.
2. Misrepresentation of client to the investment company.
3. Misrepresentation of a broker dealer in the transaction.

**Suspected Predicate Offence:** Fraud

**Status:** Investigation is ongoing



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## 4. ANTI-MONEY LAUNDERING/COMBATING THE FINANCING OF TERRORISM (AML/CFT) TRAINING AND AWARENESS

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The Centre conducted Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT) training sessions and knowledge updates for Accountable Institutions (AIs) during the period under review. Participants were drawn from key management and other operational staff of the institutions.

The training sessions included the responsibilities of staff particularly the Compliance Officers and the obligations of AIs as a whole under the AML Act, 2008 (Act 749), as amended. Again, the Centre participated in a number of AMLROs fora including those organised by the Banks and Market Operators. The Centre also received, reviewed and took action on Compliance Reports received from AIs.

The training sessions mentioned above focused on the following key areas;

- Selected core and key Financial Action Task Force (FATF) 40 Revised Recommendations which included Customer Due Diligence - R10, Politically Exposed Persons - R12 and filing of STRs - 20.
- Reporting requirements of Accountable Institutions under Act 749, as amended.
- The need to develop institutional based AML/CFT Compliance Manual/Policy document.
- The need for institutions to develop Employee Education and Training Programmes.
- Institutional Risk Assessment and applying Risk-Based Approach (RBA) in conducting due diligence on clients.

To strengthen collaboration with the key stakeholder institutions, the Centre also received a number of requests to conduct background checks on key management staff and shareholders from financial sector regulators including the Bank of Ghana and the National Insurance Commission.

### **FIC/Ghana Police/Interpol Collaboration**

Eighty-four (84) personnel were drawn from the CID, Military Police, Immigration Service, NACOB, Prison Service, GRA and EOCO at the Detective Training Academy, Tesano, Police Training School, Accra from July, 16 to August 31, 2018. The officers were trained in AML/CFT matters, Asset Recovery and Detective Skills and Knowledge.

### **GIABA/FIC Collaboration**

A National Sensitization Seminar for High-Level Religious Leaders and Institutions on Implementing AML/CFT Measures was organised on April 18 and 19, 2018 for some selected religious bodies drawn from the Christian and Muslim communities. This programme was sponsored GIABA.

### **In-House Training/Orientation for Newly Appointed Compliance Officers/AMLROs during the Year**

During the period under review, some AIs either appointed new Compliance Officers or replaced existing Compliance Officers and notified the Centre.

Subsequently, the Centre invited these Officers from the under-listed institutions for orientation programmes on their AML/CFT obligations.



- Yilo Star Microfinance Limited
- First Trust Savings and Loans
- Premium Place Investments
- Republic Investments Ghana Limited
- Alpha Capital Savings and Loans
- Pan-African Savings and Loans
- NDK Financial Services
- Khols & Hols Insurance Brokers
- Amanano Rural Bank
- ASA Savings and Loans
- Direct Savings and Loans
- Forms Capital Limited
- Chapel Hill Denham Management (Gh) Limited
- Liberty Asset Management Limited
- Liberty Securities Limited
- DCI Microfinance Limited
- Reliance Capital and Asset Financial Limited
- Bond Savings and Loans
- OmniBank Ghana Limited
- Gateway Wealth Management
- Ultimate Trust Fund Management Limited
- Services Integrity Savings and Loans
- Ghana Post Company Limited

The orientation highlighted the independence of the Compliance Officer under the Act and the responsibilities placed on the Officer by the sectoral AML/CFT Guidelines.

#### Training of Accountable Institutions (Reporting Entities)

In total, one thousand, seven hundred and fifteen (1,715) participants were trained in the year 2018.

S/N	SECTOR	ACTIVITY/PARTICIPANTS	COMMENTS/OUTCOMES
1	Banking	Training for Board of Directors, Key Management Staff and Compliance Officers/Anti-Money Laundering Reporting Officers (AMLROs) of Banks and Non-Bank Financial Institutions (NBFIs).	One thousand and sixty-eight (1,068) participants were trained.
2	Insurance	Training for Life and Non-Life insurance Companies as well as the Broking Companies.	One hundred and ninety seven (197) participants were trained.
3	Securities	Training for Capital Market Operators (CMOs)	Two hundred and twenty-one (221) participants were trained.
4	Designated Non-Financial Businesses and Professions (DNFBPs)	Training for Real Estates Developers, Car Dealers, Churches and Casinos.	Two hundred and twenty-nine (229) participants were trained.

**SUBMISSION OF 2018 END OF YEAR AML/CFT COMPLIANCE REPORTS**

In accordance with Section 41(a) of the Anti-Money Laundering Act, 2008 (Act 749), as amended, Regulation 1(2)(f)(g) of the Anti-Money Laundering Regulations, 2011 (LI.1987) and the various sectoral Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT) Guidelines, the AIs were requested to submit their 2018 AML/CFT End of Year Compliance Reports.

Accordingly, the following AIs submitted their Compliance Reports to the Centre.

BANKS	NBFIs	INSURANCE	SECURITIES
GN Bank	Services Integrity Savings and Loans	Ghana Reinsurance Company Limited	Parkstone Capital
Zenith Bank	ASA Savings and Loans	Metropolitan Life	SEM Capital Advisors Ltd
NIB	CDH Savings and Loans	Prudential Life	Ideal Capital Partners
GCB Bank	Bayport Savings and Loans	Ghana Union Assurance	Delta Capital
Republic Bank	Pacific Savings and Loans	Tri Star Insurance Services	Wealth Management Limited
FNB	SIC Life Savings and Loans	RegencyNem Insurance	InvesTrust Capital Limited
Bank of Baroda	uniCredit Savings and Loans	EDC Investment Security	SIC Brokerage Limited
Energy Bank	Bond Savings and Loans	Hollard Insurance	SIC-FSL Investment Advisory Services
Cal Bank	Opportunity International Savings and Loans	Donewell Insurance	Dusk Capital
Omni Bank	Direct Savings and Loans	NSIA Insurance	CDH Asset Management
GHL Bank	Commerz Savings and Loans	Activa Insurance	CDH Securities
UBA	Ndk Financial Services	Saham Insurance	Republic Investments
Access Bank	IFS Financial Services	Old Mutual Insurance	Republic Securities
CBG	Anlo Rural Bank	QLAC Life	SDC Capital
BSIC	Awutu Emasa Rural Bank	Ark Insurance Brokers	Family Fountain
SCB	Kwahu Rural Bank		Mutual Integrity
Fidelity Bank	Nyakrom Rural Bank		Liberty Securities Limited
FAB	Enyan Denkyira Rural Bank		Liberty Asset Management
Stanbic Bank	Akim Bosome Rural Bank		Reliance Capital and Asset Finance
Adb	Naara Rural Bank		Prudential Stockbrokers Limited
Heritage Bank	Atwima Mponua Rural Bank		Prudential Securities Limited



Prudential Bank	Asubonten Rural Bank		New Case Capital
Ecobank	Kwaebibirim Rural Bank		Union Capital
UMB	Amanano Rural Bank		Glico Capital
	Amuga Rural Bank		Nimed Capital
	Fiaseman Rural Bank		
	Atwima Rural Bank		
	Odotobri Rural Bank		
	Otuasekan Rural Bank		
	Upper Manya Krobo Rural Bank		
	Avenor Rural Bank		
	Kwahu Praso Rural Bank		
	Asokore Rural Bank		
	Nkoranza-Kwabre Rural Bank		
	Builsa Community Bank		

#### DUE DILIGENCE REQUESTS FROM THE BANK OF GHANA

During the period under review, the Centre received requests from Bank of Ghana to conduct due diligence on new employees or key management staff of banks and Non-Bank Financial Institutions. These requests were referred to Bureau of National Investigation, Research Department of the Ministry of Foreign Affairs and Regional Integration and other competent authorities for action.

Below is a breakdown of due diligence in 2018.

Institutional Correspondence	Total	No. of responses submitted (by FIC)
BSD – FIC	195	124
OFISD – FIC	385	82
BOG – FIC	103	75
PS – FIC	48	21
NIC – FIC	131	82
OTHERS – FIC	10	2

#### Issue identified

During the period under review, due diligence conducted on some key personnel could not confirm that they were educated at the institutions they indicated on their Personality Notes (PN) Forms or their CVs.

Subsequently, the Centre advised the Bank of Ghana to confront these persons to provide further clarifications and additional evidence on the intelligence received in order to substantiate their claims.



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## 5. OTHER AML/CFT&P - RELATED PROGRAMMES

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### **Second Round of Mutual Evaluation Report and Follow-up Actions**

The Mutual Evaluation Report which was adopted in May 2017, focused on both Technical Compliance and Effectiveness. Following the exercise, Ghana was placed on an Enhanced Follow up reporting regime. This meant that Ghana was to present a report on progress made on yearly basis. The Mutual Evaluation Report identified some strategic deficiencies in Ghana's AML/CFT regime and made some recommendations to address the gaps identified. Subsequently, Ghana was placed on International Cooperation Review Group (ICRG) of the FATF Observation and Monitoring process. This process enjoins Ghana to put adequate measures in place to correct any deficiencies identified during the exercise.

In March 2018, Ghana presented its first Follow-up Report to GIABA on the progress made in respect of Technical Compliance and Effectiveness of its AML/CFT regime. The report was discussed in May 2018 at its Plenary held in Somone, Senegal. Ghana requested for an upgrade on five (5) Recommendations (Rec. 16, 17, 18, 33 & 35) which were rated Partially Compliant (PC). Recommendations 16 and 17 were upgraded from PC to Largely Compliant (LC) following certain reviews in its AML/CFT Guidelines. However, the other Recommendations did not receive a favourable response.

Also, in June 2018, Ghana ended its one-year observation and monitoring period of the FATF by the International Cooperation Review Group (ICRG). Ghana was expected to implement the recommended actions in the Mutual Evaluation Report and demonstrate the effectiveness of its AML/CFT regime.

Accordingly, in September 2018, Ghana was asked to submit a progress report and subsequently invited by the ICRG of the FATF to a face-to-face meeting to demonstrate and defend effective actions undertaken on its AML/CFT regime. The ICRG of the FATF observed that there were still some remaining deficiencies Ghana was yet to fully address. Consequently, an Action Plan with strict timelines ending in December 2020 have been developed for the Ghana on the following Immediate Outcomes; (1, 3, 4, 6, 9, 10 & 11) criteria to ascertain the effectiveness of AML/CFT regime.

The Ghana delegation which was led by the Hon. Kwaku Kwarteng, Deputy Minister of Finance assured the ICRG of the FATF of the Government's commitment towards the fight against AML/CFT and its preparedness to ensure that all the deficiencies are addressed.

### **The Review of the National Risk Assessment (NRA)**

Recommendation 1 of the FATF Revised Recommendations (2012) admonishes countries to identify and assess threats and vulnerabilities at the national level. This Recommendation outlines general principles that serve as a useful framework in assessing Money Laundering/Terrorist Financing and Proliferation (ML/TF&P) risks.

Following the conclusion of the Second Round of the Mutual Evaluation exercise, it was identified that Ghana had not included certain emerging risks areas such as the extractive, hotelier and the cocoa sectors in its National Risk Assessment (NRA) Report conducted in 2014. Subsequently, there was the need to review the NRA to assess the ML/TF risks within those sectors. The review exercise of the NRA also considered an assessment of the national vulnerabilities and sectoral vulnerabilities in line with the World Bank Tool.



The composition of the Working Groups for the NRA review were drawn from all the relevant stakeholders in the country. Eight (8) Working Groups were formed in line with the World Bank Risk Assessment Tool. The process involved the collection of data, analysis of data, drafting of the report and recommendations.

The review also affected certain high ratings as the ML/TF risks within those sectors were downgraded to medium risk or low risk as a result of adequate measures being put in place following the recommendations of the NRA report of 2014. The review exercise also considered amendments made to the legal and institutional frameworks of certain institutions. The revised NRA report was completed and published in 2018.

#### **The Committee for Cooperation between Law Enforcement and the Banking (COCLAB)**

The Committee for Cooperation between Law Enforcement and Banking (COCLAB) was re-constituted in August 2017. Subsequently in April 2018, COCLAB members which include the Financial Intelligence Centre met to discuss issues of relevance on Anti-Money Laundering and Combating the financing of terrorism (AML/CFT) particularly in the area of information sharing.





## 6. INTERNATIONAL COOPERATION

The Centre exchanged information with relevant international counterparts on a range of issues related to Money Laundering, Terrorist Financing, and Proliferation of weapons of mass destruction and asset tracing.

The Centre received twenty-seven (27) requests from foreign counterparts and sent fifty-six (56) requests to foreign counterparts in 2018. In contrast, the Centre sent thirty-six (36) spontaneous disseminations to various jurisdictions and received nineteen (19) spontaneous disseminations.

To foster cooperation and understanding with foreign counterparts, the Centre signed Memoranda of Understanding (MoU) with the Financial Intelligence Authority, Uganda on February 15, 2018 and the Indonesian Financial Transaction Reports and Analysis Centre (PPATK) on March 03, 2018.

During the year, the Centre actively participated in activities of various international organizations and networks to facilitate cooperation, information exchange and compliance with international standards.

The Centre participated in the Financial Action Task Force (FATF) Plenary Meetings held in Paris, France from June 21-23, 2018 and October 17-19, 2018. At these meetings, among other issues, progress made by Ghana following the completion of its Mutual Evaluation exercise in 2016 was discussed.

The Centre engaged with one hundred and fifty- one (151) counterpart FIUs and benefited from various training sessions during the 25th Plenary Group Meeting of the Egmont Group of Financial Intelligence Units held in Sydney, Australia from September 24 to September 27, 2018.

At the sub-regional level, the Centre benefitted from in-depth exchanges with Member Countries during the 29th and 30th Technical Commission /Plenary Meetings of the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) held on May 7-13, 2018 and November 11-16, 2018 in Senegal and Gambia respectively.

The Annual Meeting of the Asset Recovery Inter-Agency Network for West Africa (ARIN-WA) held in Cotonou, Benin from November 20-23, 2018 afforded the Centre the opportunity to exchange experiences on asset tracking and freezing, confiscation and other related efforts with other member countries.

During the year, the Centre hosted three (3) delegations from West Africa and one (1) delegation from East Africa. These visits facilitated mutual exchanges on a range of AML/CFT issues. These delegations comprised the following;

- i. Board members of the Financial Intelligence Authority (FIA) of Uganda, from February 13 to 15, 2018,
- ii. Commissioners from the Cellule Nationale de Traitement des Information (CENTIF)-Burkina Faso, from February 27-March 3, 2018,
- iii. Board members of the Financial Intelligence Unit of The Gambia, from July 17-20, 2018.
- iv. Representative from the Cellule Nationale de Traitement des Information (CENTIF)-Benin, from December 12 to 14, 2018.





## 7. HUMAN RESOURCE DEVELOPMENT

In line with efforts to build the capacity of staff at the FIC, staff were nominated to participate in various forms of domestic and international capacity building programmes. Details of these capacity building programmes are indicated below.

### International capacity building programmes

S/N	Date	Course Attended	Number of staff	Sponsors	Venue
1	January 2018	Joint GIABA-Egmont Group Regional Strategic Analysis Course for Financial Intelligence Units	2	EGMONT	Senegal
2	January 2018	GIABA-MENFATF-ESAAMLG Typology Study	2	GIABA	Morocco
3	February 2018	Global Tax Policy	1	FIC	Vienna
4	February 2018	ECOFEL Programme Meeting	1	EGMONT	France
5	February 2018	FATF Plenary	2	FIC	France
6 7	March 2018	High-Level Workshop On Digital Coin, Block chain Technologies Cryptocurrencies and The ECOWAS ECO	1	WAIFEM	Dubai
8	May 2018	GIABA Plenary	2	FIC	Senegal
9	May 2018	Regional Course on Combating Money Laundering and other financial crimes	2	WAIFEM	Sierra Leone
10	June 2018	Regional training of trainers workshop under SAMWA Project	1	GIABA	Senegal
11	July 2018	Annual Cyber Security Boot Camp	1	FIC	Spain
12	August 2018	Special Control Unit against Money Laundering (SCUML)	2	FIC	Nigeria



13	November 2018	Treasury and Compliance Management	1	FIC	Abuja
14	October 2018	Facilitating a common currency in ECOWAS: Blockchain Mining Technology, Monetary Sovereignty and Fiscal Issues	1	WAIFEM	Dubai
15	October 2018	GIABA Regional Capacity building Workshop for LEAs on the Structure, Investigation, and Techniques of Criminal Assets Seizures, Freezing, Confiscation, Recoveries, Management in Compliance with UNSCRs.	1	GIABA	Abuja
16	October 2018	Regional Conference on Combating Money Laundering and Terrorist Financing in the Maritime Sector	1	GIABA	Sierra Leone
17	November 2018	Joint Regional Meeting of Chief Compliance Officers of Financial Institutions-DNFBBs and Competent Authorities on ML&TF Issues	1	GIABA	Togo

### Local Capacity Building Programmes

S/N	Date	Course Attended	Number of staff	Sponsors	Venue
1	February 2018	Executive Leadership And Management Programme	3	Commonwealth Secretariat	Accra
2	February 2018	Cyber Crime Investigations Course	1	US Embassy	West African Regional Training Centre, Accra
3	March 2018	Financial crime	5	US Embassy	West African Regional Training Centre, Accra



3	March 2018	Integrity Management Forum	2	e-Crime Bureau	Accra
4	May 2018	Procurement Principles and Practice	1	FIC	Accra
5	July 2018	Advanced Financial crimes and Digital Evidence	5	US Embassy	West African Regional Training Centre, Accra
6	September 2018	Principles And Methods of Police Evaluation.	3	German Embassy	Accra
7	November 2018	Basic Police Tactics and Methods	3	German Embassy	Accra
8	October 2018	Anti-Money Laundering For Casinos	2	US Embassy	West African Regional Training Centre, Accra

## 8. ACHIEVEMENTS

- The review of the National Risk Assessment report to include emerging ML/TF risks areas such as the extractive, cocoa and the hoteliers sectors.
- The launch of the go-AML to facilitate the reporting of Suspicious Transaction Reports, Electronic Cash Transaction Reports and Cash Transaction Reports by Accountable Institutions.
- Effective and continuous capacity building programmes for the Law Enforcement Agencies and DNFBPs.

## 9. CHALLENGES

- Untimely release of funds to support the activities of the Centre.
- Inadequate office space.
- Absence of legal, institutional framework as well as appropriate AML/CFT Guidelines for the regulation of the DNFBP sector.
- Poor reporting by Accountable Institutions through the go-AML software.

## 10. WAY FORWARD

- Development of Money Laundering typology document to assist Accountable Institutions in reporting suspicious transactions.
- Development of AML/CFT Guidelines for selected DNFBPs to assist them in meeting their responsibilities and obligations under Act 749, as amended.
- Operationalisation of the Beneficial Ownership Register.
- Deepen national coordination and collaboration among key stakeholders.
- Build the capacity of Regulatory and Supervisory Bodies and Accountable Institutions on ML/TF.

