



Office for  
Prevention and Fight against  
Money Laundering

# 2025

## ANNUAL REPORT

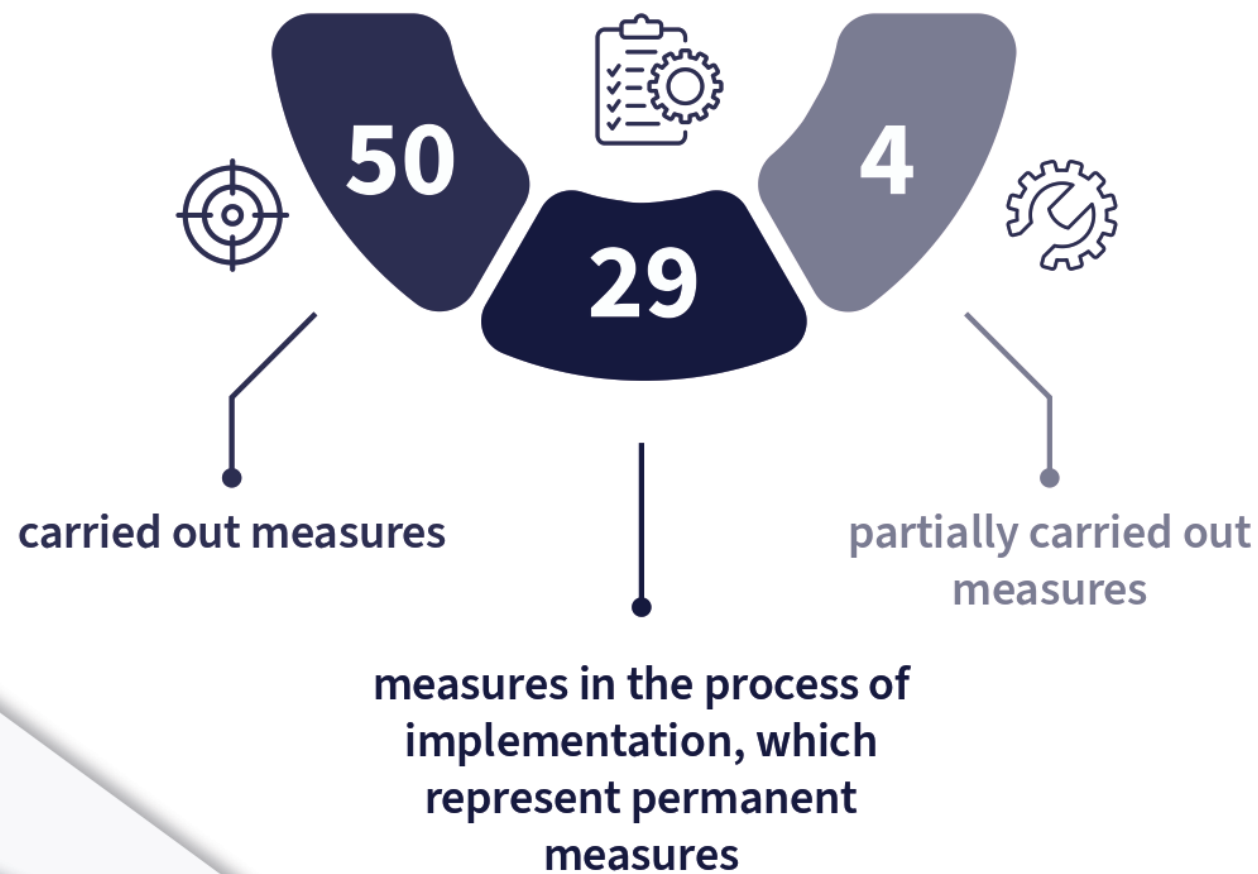
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# SUMMARY

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# National strategy in the field of preventing and combating money laundering and terrorist financing

On the basis of the information submitted by the responsible authorities regarding the measures carried out in accordance with the Action plan for the implementation of the National strategy for preventing and combating money laundering and terrorist financing for 2020-2025, it is to be noted the implementation of measures, according to the following:



## Carried out priority measures

### 1 Review of normative framework

The amendments operated at the level of the primary legal framework imposed the review and adjustment of the secondary normative framework, including of normative acts and instructions applicable to competent authorities and obliged entities. This process followed to ensure a unitary, coherent and efficient application of the new legal provisions in the field of preventing and combating money laundering and terrorist financing, as well as the elimination of potential shortcomings or ambiguities in interpretation.



### 2 Intensification of training measures and methodologic guidance

A separate attention was given to information and training activities, through the organization of training sessions oriented on obliged entities, bodies with supervision functions of obliged entities and law enforcement agencies. The approached topics included the new legal requirements, the obligation regarding the identification and verification of the beneficial owner, the reporting of suspicious transactions, the application of international financial sanctions, the risks associated with virtual assets, as well as the use of financial information for analytical and investigation purposes.

## Consolidating the inter-institutional and international cooperation

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The operative exchange of information was maintained and developed between the Office, bodies with supervision functions of obliged entities and law enforcement agencies, including in order to support the financial analysis, investigation and criminal prosecution activities. At the same time, international cooperation activities were carried out, including information exchange and the provision of international legal assistance, within the legal competences.

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## Consolidating the supervision of the obliged entities

The bodies with supervision functions of obliged entities continued the implementation and consolidation of the risk based approach in the monitoring and supervision activity of the obliged entities. On-site and off-site inspections were performed, internal procedures and the compliance degree of the obliged entities' activity with the requirements of the national legal framework in the field were analysed, recommendations were formulated for mitigating the established deficiencies, and as the case may be, sanctions were applied in accordance with the legal provisions. In parallel, were reviewed and improved the methodologic tools used in the supervision process, including the sectoral guidelines and instructions.

## Consolidating the measures for combating money laundering and terrorist financing

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The law enforcement agencies intensified the investigation and criminal prosecution measures in cases related with money laundering offences, predicate offences and terrorist financing. In this regard, criminal cases were initiated and examined, provisional measures were applied in order to seize the suspicious assets and criminal procedural actions were carried out in order to document the illicit origin of funds. At the same time, the inter-institutional cooperation was consolidated for the purpose of ensuring the complete evidence, oriented on holding accountable the involved persons and confiscating the assets derived from criminal activities.

2020 2021 2022 2023 2024 2025

## End of the 2020-2025 strategic cycle

At the end of the implementation period of the National strategy for preventing and combating money laundering and terrorist financing for 2020-2025 the end of an important cycle of public policies in this area is ascertained.

The strategy contributed to consolidating the normative and institutional framework, to development of inter-institutional cooperation and increase in the compliance level of the national system with the international standards.

The money laundering and terrorist financing national risk assessment, the dynamic of financial flows, the expansion of the use of new technologies and the enhanced complexity of criminal typologies require the transition to a new stage of strategic planning.

In this context, the money laundering and terrorist financing national risk assessment delivered an updated and detailed analysis of threats, vulnerabilities and systemic deficiencies, offering a solid basis for defining the future intervention priorities.

Therefore, it is necessary to create a new public policy document for the next period, based on the outcomes of the national risk assessment and on the experience of implementing the strategy for 2020-2025.

The new policy document has to ensure the continuity of the initiated reforms, but also a clear reorientation to efficiency, measurable results and practical application, through a consolidated risk based approach.

# The money laundering and terrorist financing national risk assessment

The money laundering and terrorist financing national risk assessment represents a fundamental process through which the state identifies, analyses and understands the real level of risks to which the national system is exposed. This assessment allows to approve adequate public policies, based on evidence and adapted to internal and international evolutions. Also, the national assessment contributes to an efficient cooperation between the public authorities and private sector, so that the prevention and combating measures are coherent, applicable and proportionate.



The Office, in cooperation with the bodies with supervision functions of obliged entities, with law enforcement agencies and competent institutions, ensured the organisation and progress of the process of the money laundering and terrorist financing national risk assessment.

The national risk assessment has the role to fundament and orient the development and the adjustment of the normative, institutional and of public policy framework in the field of preventing and combating money laundering and terrorist financing, so that it responds adequately to the identified risks. At the same time, the results of the assessment represent the basis for the efficient and proportional allocation of material, financial, and human resources by the Office, bodies with supervision functions of obliged entities, law enforcement agencies and other competent institutions.



Also, the conclusions of the national assessment are used for informing the public authorities, professional associations and obliged entities regarding the identified level and risk typologies, thus contributing to the consolidation of the national capacity to prevent and combat money laundering and terrorist financing.

## The assessment stages:



## The money laundering risk assessment per economy sectors

As a result of integrated statistical data analysis, operational information and assessment of threats and vulnerability of specific examined economy areas, it was established that the following economy sectors presents the highest levels of money laundering risk:

These sectors were qualified with high risk, by taking into account the volume of transactions, specificity of activities, exposure to cross-border transactions, use of financial mechanisms and the vulnerabilities identified during monitoring and control.



Agriculture sector



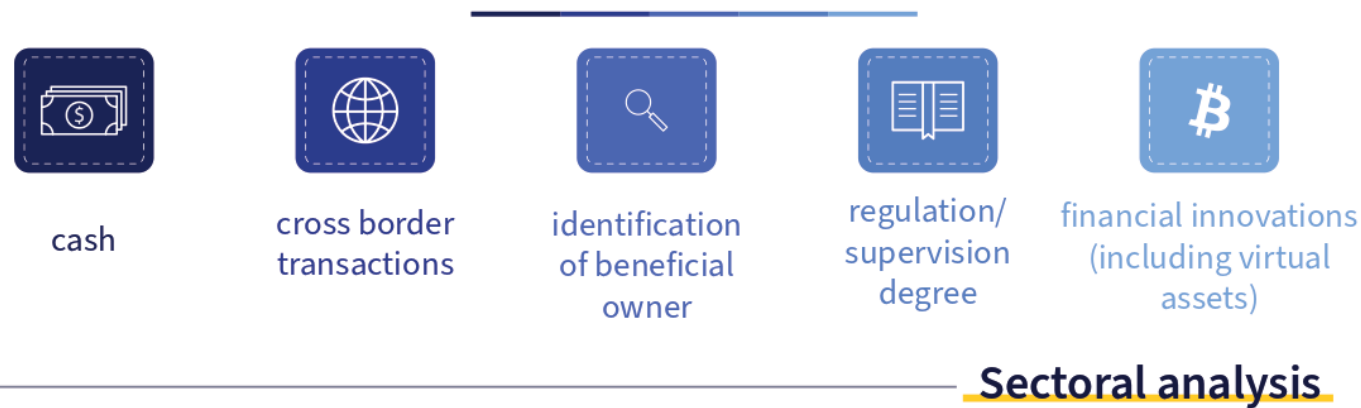
Information technology sector



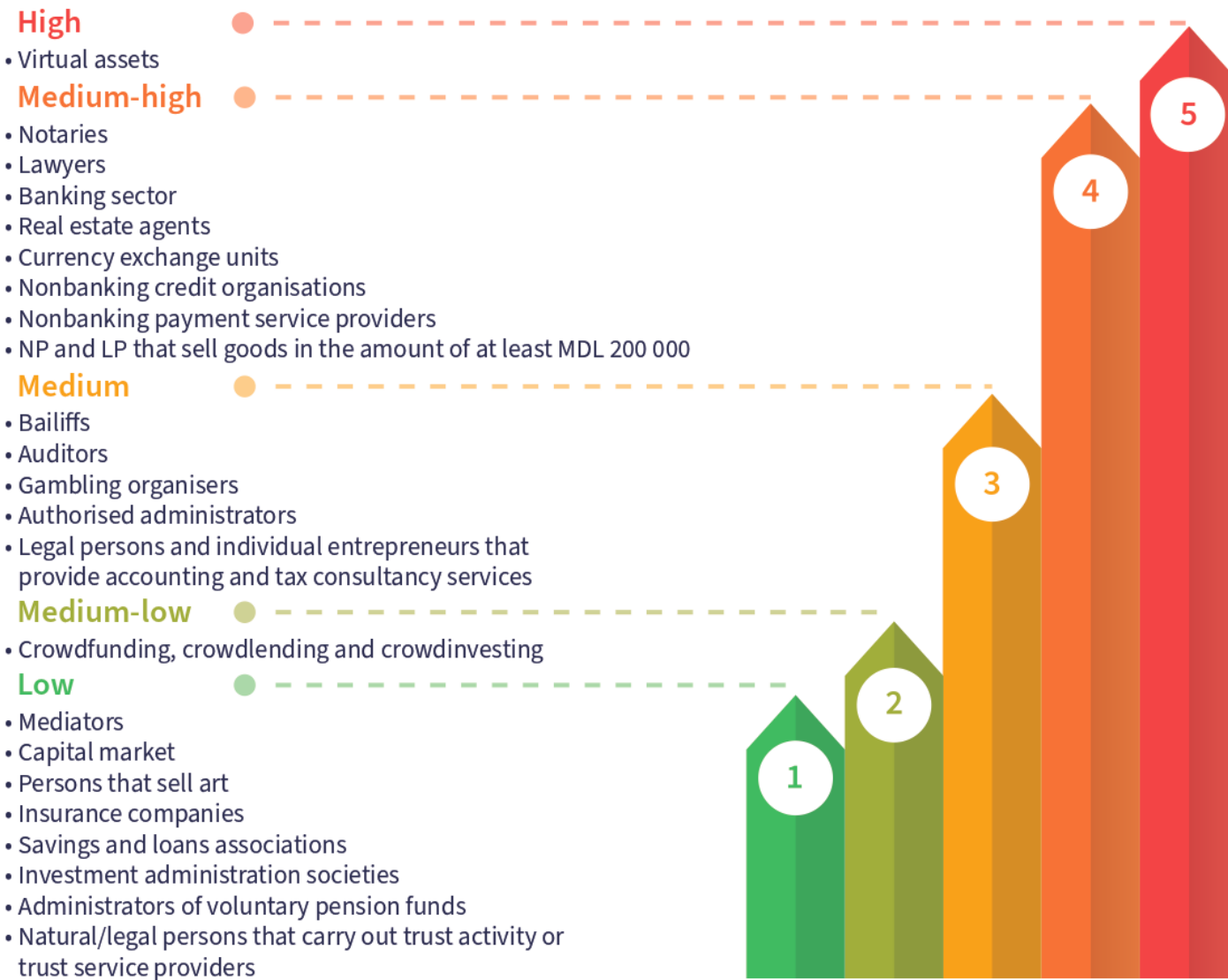
Construction sector

## Cross-sectorial risk

The performed analysis reveals that, although each assessed economic sector presents specific vulnerabilities, a series of common elements can be identified that cross the analysed areas and generate significant interdependencies from a money laundering risk perspective. A comparative look highlights five major dimensions:



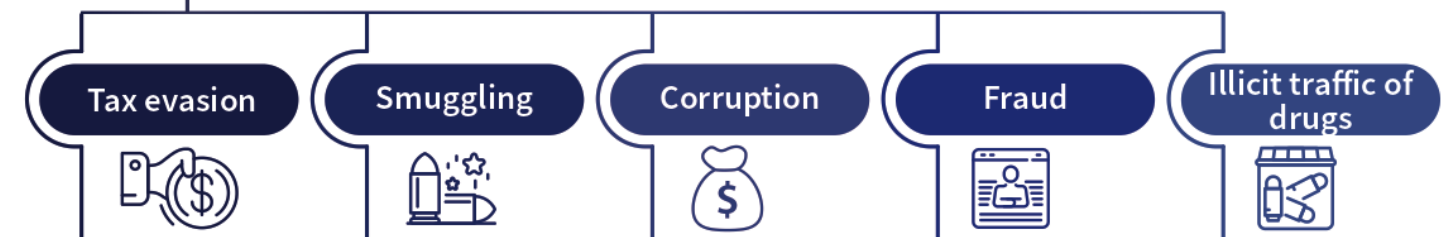
## Sectoral analysis



## Money laundering risk depending on the predicate offence

As a result of systematisation, correlation and analysis process of statistical data and available information, provided by the competent authorities, the working groups identified the main illegal proceeds generating offences at the national level, that presents a significant potential for fuelling the money laundering phenomena.

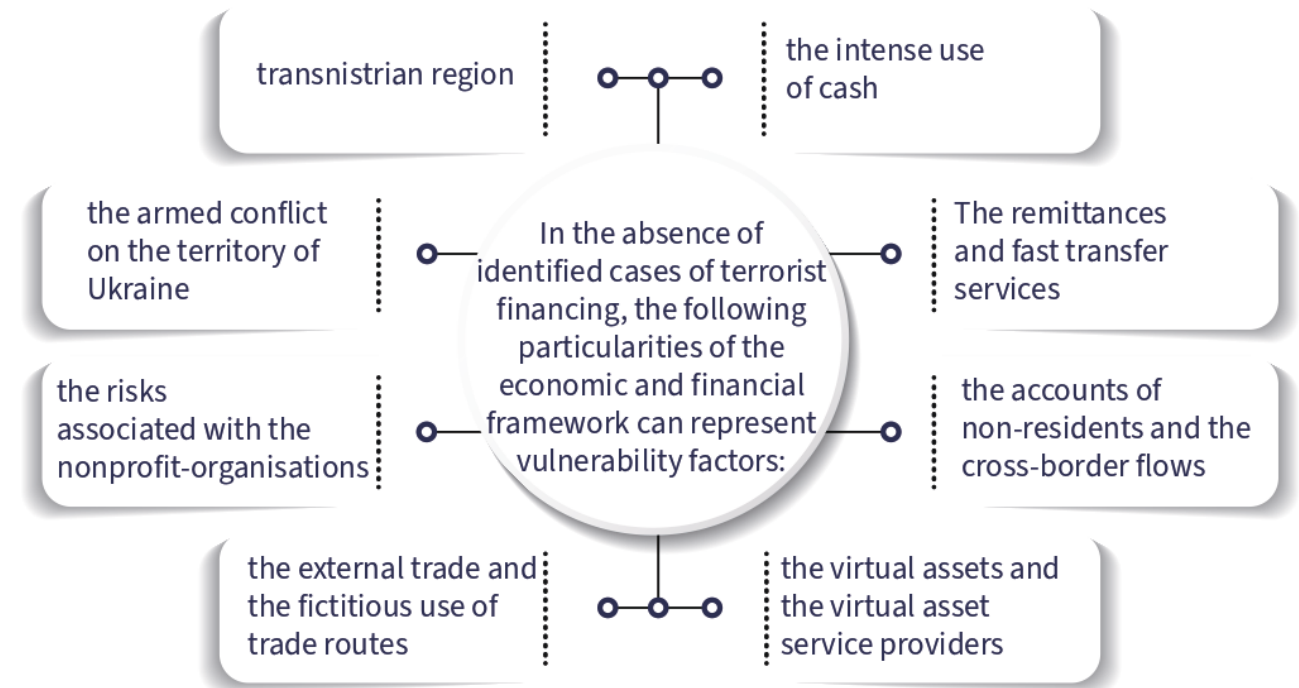
Thereby, the following categories of predicate offences were highlighted:



## The terrorist financing risk

The situation regarding terrorist financing in the Republic of Moldova is being characterised through a very low risk level, and through a distinct set of systemic, geostrategic and technological vulnerabilities, which require an ongoing assessment.

The analysis shows that the Republic of Moldova is not and never been an operational space for international terrorist groups, no active cells or supporter were identified and neither confirmed cases of terrorist financing during the assessed period.



# Supervision and Control

The activity of supervision and control of the obliged entities from the competence area of the Office refers to all actions of supervision, monitoring, assessment, verification and control carried out for the purpose of ensuring the compliance of obliged entities with the requirements of legislation regarding prevention and combating money laundering and terrorist financing, as well as the application of appropriate measures in the event of violations being found.

Through supervision and control attributions, the Office ensures the compliance of the obliged entities, reduces the money laundering and terrorist financing risks and promotes prevention, transparency and responsibility through:



Training and guiding of entities, as well as monitoring the reporting



planned or unforeseen inspections, to verify the compliance with the legislation



risk based supervision, to assess the compliance and identify the vulnerabilities



detection of violations, application of remedial measures and sanctions

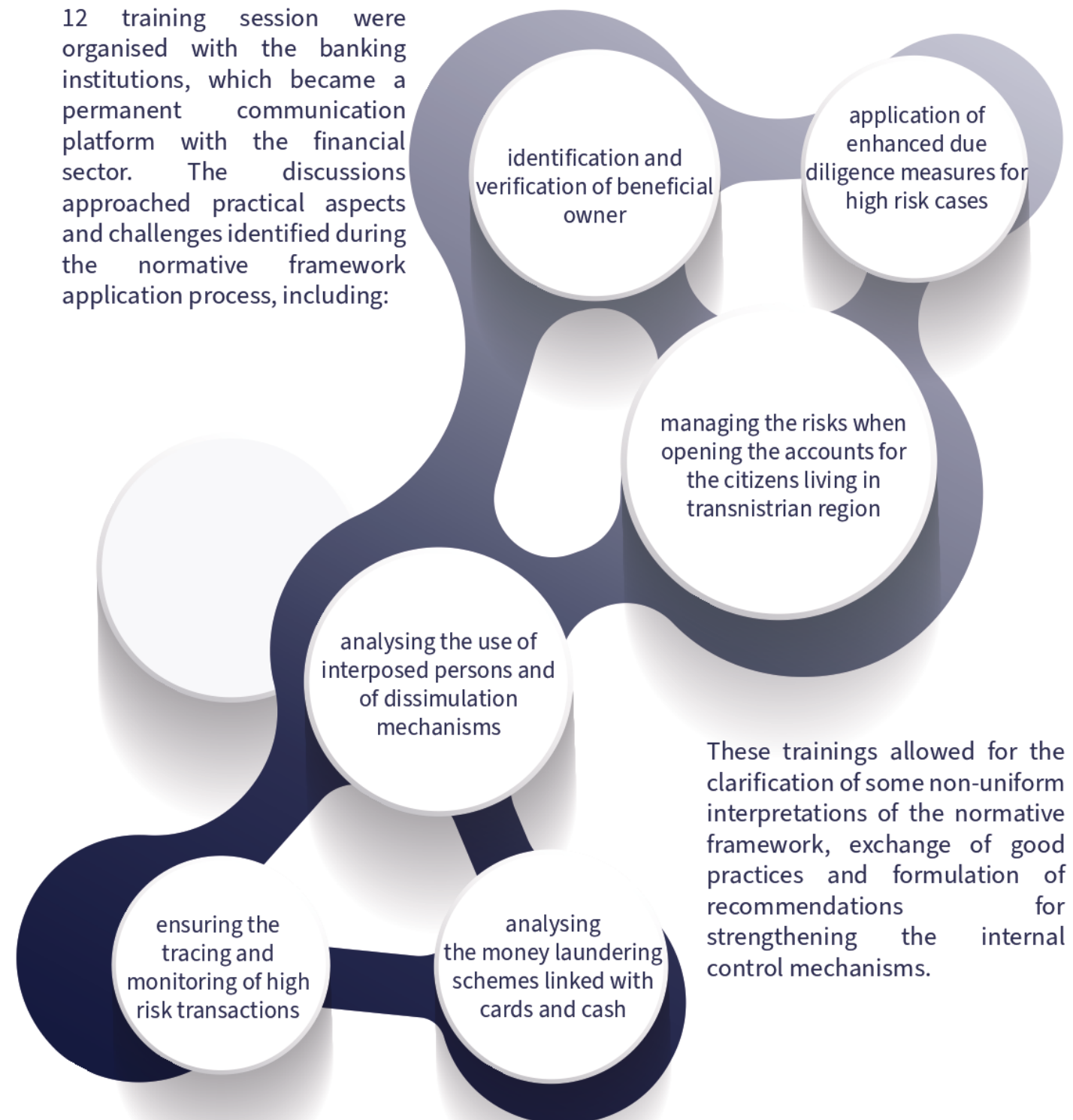


continuous monitoring of the activity and of internal prevention measures

## Consolidating the capacities of the obliged entities

During 2025, the Office carried out a continued systemic programme for informing and strengthening the capacities of obliged entities, having as objective to increase the compliance level with the legislation in the field of preventing and combating money laundering and terrorist financing, standardization of applied practices and consolidation of risk based approach at the sectoral level.

12 training sessions were organised with the banking institutions, which became a permanent communication platform with the financial sector. The discussions approached practical aspects and challenges identified during the normative framework application process, including:



These trainings allowed for the clarification of some non-uniform interpretations of the normative framework, exchange of good practices and formulation of recommendations for strengthening the internal control mechanisms.

At the same time, the Office organized 13 training sessions dedicated to other categories of obliged entities, including notaries, bailiffs, real estate agents and legal persons selling goods for more than MDL 200 000.

The professional development sessions were oriented on:

the application of the risk based approach, through carrying out the internal risk assessment and the adaptation of due diligence measures depending of the customer's profile, nature of transactions and specificity of the sector

the recognition and management of risks associated with the transactions with high value assets and use of cash, including the application of enhanced due diligence measures in high risk cases



Through these activities, the Office contributed to strengthening the capacities of the obliged entities to identify and manage the risks, to improving the compliance level and to consolidating the cooperation between the authorities and the private sector.

## The control activity

During the year, the Office initiated 6 control procedures in relation to the obliged entities in its field of competence, based on the annual control plan and the information held regarding possible violations of the normative framework. These controls aimed at assessing the degree of compliance of the obliged entities with the requirements of the legislation in the field of preventing and combating money laundering and terrorist financing, as well as verifying the efficiency of internal control mechanisms.

As a result of the performed verifications, were established deficiencies and violations of the legal obligations, of which the most frequent ones targeted:

failure to inform the Office, in the terms established by the law, regarding the performed activities or transactions, including omissions in the reporting of suspicious transactions and/or of transactions that are reaching the value thresholds provided by the legislation

failure to identified or insufficient documentation of the origin of assets and of the funds involved in transactions, especially in cases of high value operations or with high risk elements

- 1
- 2 improper application of customer due diligence measures, including deficiencies in the process of identification and verification of identity, absence of information updates regarding customers and absence of proper assessment of risk profile
- 3
- 4 failure to approve, update or the formal implementation of policies, controls and procedures for preventing and combating money laundering and terrorist financing, affecting the efficiency of suspicious transactions detection system

For the established violations, the Office applied financial sanctions in accordance with the provisions of Law No. 75/2020 in a total amount of:

**MDL 2 647 728**

The sanctions were individualized depending on the gravity of facts, nature and duration of the non-compliances, as well as the potential impact on the system for preventing and combating money laundering and terrorist financing.

# Strategic Analysis



The strategic analysis represents a fundamental tool for identifying the tendencies, typologies and vulnerabilities in the field of preventing and combating money laundering and terrorist financing.

Through the risk assessment at the sectorial and systemic level, it is possible to establish the institutional priorities, to fundament the regulation and supervision decisions and to adapt the national framework to the evolution of phenomenon and to international standards.



## Purposes and Objectives

performing the strategic analysis for identifying the tendencies, typologies and vulnerabilities



formulation of proposals, including legal for reducing risks



offering feedback to obliged entities and informing regarding new tendencies



development and transmission of analytical notes to authorities



identifying the high risk sectors and recommendations for improving the normative framework



informing the authorities regarding the risks and vulnerabilities for applying the necessary measures



# Operational Analysis

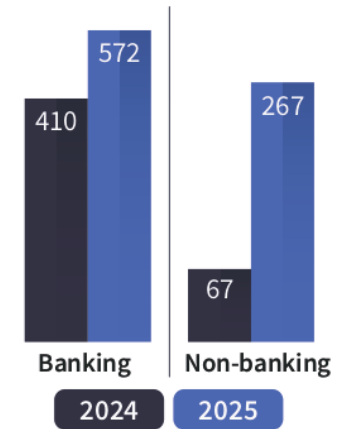
The operational analysis represents the base component of the activity for preventing and combating money laundering and terrorist financing, being oriented on the concrete examination of suspicious transactions and activities. Through collection, correlation and valorization of available information, this permits to identify the links between the persons, entities and financial flows, the establishment of suspicious character of operations and dissemination of relevant information to competent authorities.

In carrying out the operational analysis, the Office exercise the following attributions:

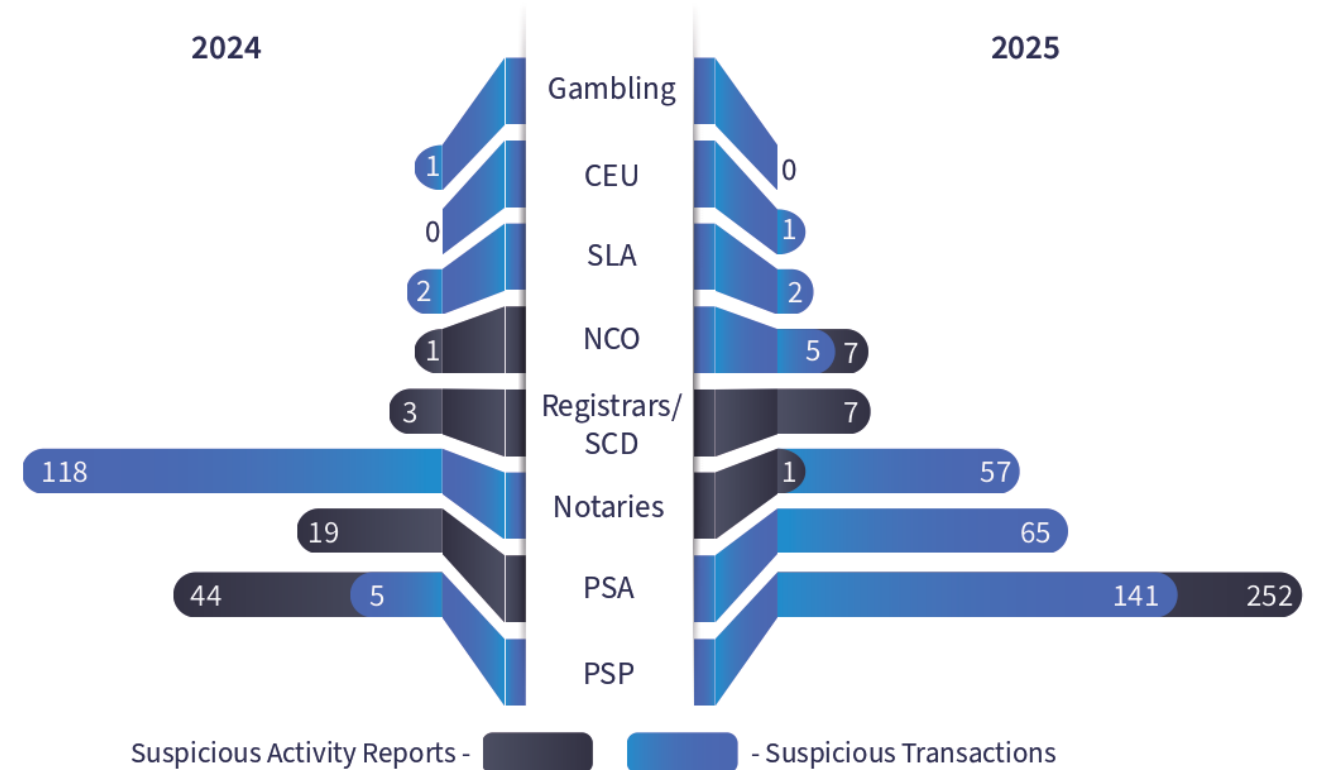
- 1 reception, registration, analysis and processing of information about suspicious transactions, transactions above the legal thresholds and cash operations, submitted by the obliged entities according to art. 11 of Law No. 308/2017
- 2 analysis and use of information regarding suspicious activities and transactions of money laundering, predicate offences and terrorist financing, as well as their transmission to competent authorities, according to the law
- 3 performance of financial investigations for suspicious transactions, by using the available data bases and request of additional information from the obliged entities, public authorities and similar services from other jurisdictions
- 4 carrying out analyses and financial investigations in the field of virtual assets
- 5 identification and elaboration of typologies regarding the new tendencies of money laundering, predicate offences and terrorist financing
- 6 application of provisional measures over the suspicious transactions and activities, according to Law No. 308/2017
- 7 informing the competent authorities when there are reasonable suspicions of money laundering or other illicit asset generating offences, as well as informing the Intelligence and Security Service in cases of terrorist financing
- 8 monitoring the results obtained by the authorities following the analysis of information submitted by the Office

Reported transactions	Banks		Non-banking entities	
	2024	2025	2024	2025
Suspicious	198	109	126	271
Cash	5 180 992	5 405 628	59 147	53 278
Threshold	2 140 718	2 513 081	32 787	42 966
Money remittances	78 103	63 528	267	383
<b>Total</b>	<b>7 400 011</b>	<b>7 982 346</b>	<b>92 327</b>	<b>96 898</b>

Suspicious Activity Reports (SARs)



The number of SARs/suspicious transactions reported by the non-banking entities

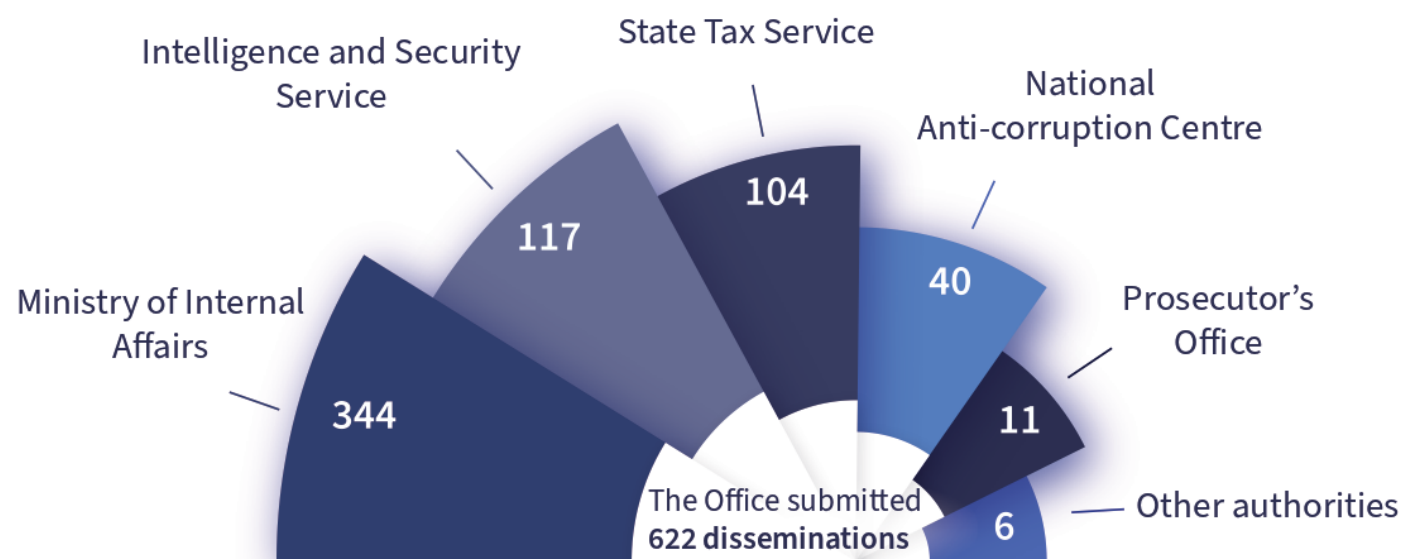


Within the operational analysis activities were performed **724 analytical notes**



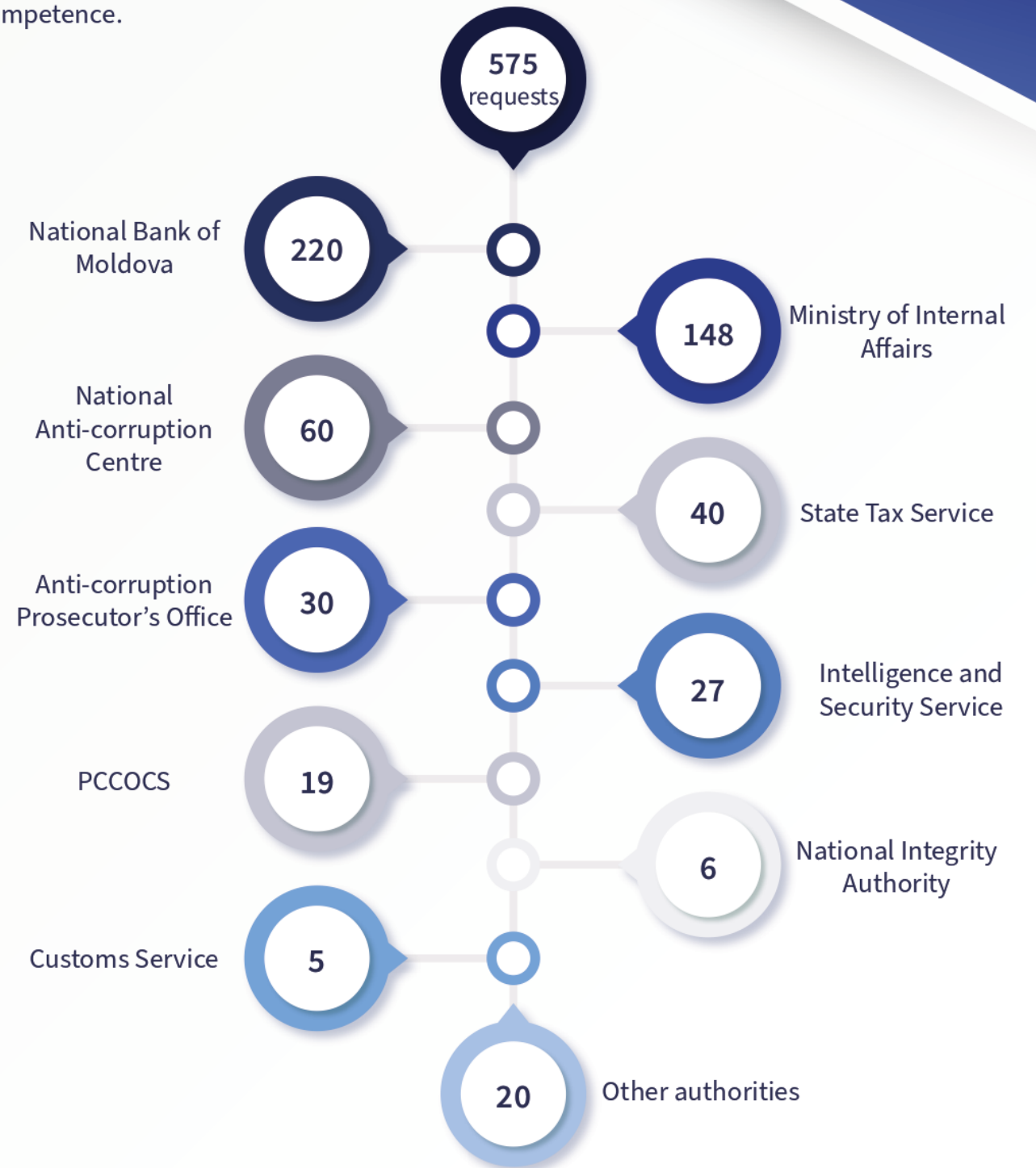
# National Cooperation

In the context of institutional information exchange with the national authorities, the Office disseminates the results of analytical notes derived from processing the information received from the obliged entities, under the basis of art. 11 of Law No. 308/2017, to the national competent authorities and, as the case may be, to similar services from abroad, depending on the area of competences.



2 488 natural persons  
 502 legal persons  
 Subjects of disseminations

Also, the Office examines the requests of other institutions, according to the competence.



706 natural persons  
 291 legal persons  
 Analysed subjects

# International Cooperation

## The Moneyval Committee of the Council of Europe

In 2025, the representatives of the Office participated at the joint Plenary Meeting of the Financial Action Task Force (FATF) and the Moneyval Committee, hosted by the Council of Europe, which reunited the representatives of the Global Network consisting of 200 jurisdictions and observers, organised with the purpose of consolidating the international efforts for combating the money laundering offences and terrorist financing. The Global Network consisting of FATF and the nine FATF style regional bodies-including the Moneyval Committee, held technical meetings regarding essential aspects linked with money laundering, terrorist financing and proliferation of weapons of mass destruction.

This reunion was marked by an important moment through the approval of the 3rd Progress Report regarding the implementation of recommendations formulated in the evaluation report of the Republic of Moldova approved in 2019, which reflected the evolutions registered by the public authorities in the field of preventing and combating money laundering and terrorist financing.

According to the established procedures, the Moneyval Committee, on the basis of data provided by the national authorities, re-examined the level of compliance with the FATF Recommendations,

previously assessed as “Partially Compliant” for the following recommendations:

- Recommendations 22 “DNFBPs: customer due diligence”;
- Recommendation 24 “Transparency and beneficial ownership of legal persons”;
- Recommendation 25 “Transparency and beneficial ownership of legal arrangements”.

The Moneyval Committee positively appreciated the significative amendments, which influenced the re-evaluation of recommendations, including the approval of the Law No. 268/2024 and the Law No. 34/2024, as well as the approval of the relevant regulations and guidelines in the field of preventing and combating money laundering and terrorist financing.



## EFIPPP

EUROPOL Financial Intelligence Public Private Partnership (EFIPPP) represents a strategic cooperation initiative aiming at consolidating the information exchange and operational collaboration in the field of preventing and combating money laundering and terrorist financing.

EFIPPP has as principal objective the creation of an efficient and functional cooperation framework between EUROPOL, law enforcement agencies, financial intelligence units, financial institutions, as well as other competent authorities from member states. Through this partnership, is facilitated the relevant exchange of information, joint analysis and the development of responses coordinated to the emergent risks from the financial field.

This forum was created in 2017, starting from the recognition of the essential role of the private sector in the identification of suspicious activities and their reporting to the competent authorities. The implication of the obliged entities significantly contributes at the timely detection of money laundering and terrorist financing schemes, as well as at the reduction of the existent and future risks. At the same time,



EFIPPP offers a platform for the exchange of experience and good practices in the application of the relevant normative framework.

The participation of Office as a member of the EFIPPP offers important opportunities for consolidating the institutional capacities. This status offers access to relevant information, interaction with experts and involvement in joint initiatives. At the same time, it contributes to the alignment of the national practices with the European and international standards and to the continuous development of the system for preventing and combating money laundering and terrorist financing.

## Conference of parties of the Member States of CETS 198

The Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS No. 198), is the first comprehensive international treaty that covers both the prevention and combating of money laundering and terrorist financing. It is the key convention of the Council of Europe, that consolidates the current global standards by establishing specific requirements regarding preventive regimes of money laundering and terrorist financing, provisional measures, seizing and confiscation, sharing of assets between the parties, financial intelligence units, international cooperation and other aspects.

The convention approaches the fact that the fast access to financial information regarding the assets held by criminal organisations, including terrorist groups, is the key to successful preventive and repressive measures and, at the end, is the best modality to stop them. The convention established a mechanism to ensure the proper enforcement by the parties of its provisions through a conference of parties. Its monitoring procedure completes the activity of relevant bodies that monitor the implementation of FATF standards, namely the Moneyval Committee and FATF. The action of the Conference of Parties is central in the fight against the organised crime and contributes to the action of the Council of Europe against corruption, traffic of human beings, cybercrime and of economic crime in general.

To be mentioned that, within the framework of the 17th plenary meeting, the representative of the Office, was re-elected as the president of COP CETS 198 for a 2-year mandate.



## Egmont Group



The Egmont Group is an international organisation, which aims to facilitate the cooperation and exchange of information between the Financial Intelligence Units. Continuously, the Egmont Group is supporting its own members in implementing the international standards and regulations in the field, by offering a dialogue platform, by issuing certain documents aiming to guide the international cooperation activity between the services of member states. Within the framework of the Egmont Group functions a coordination committee, 9 regional groups and 4 working groups.

The Office, as the Financial Intelligence Unit of the Republic of Moldova, actively participates within the activities of the Egmont Group, taking advantage of the opportunities offered by this international network. The activity of the Office is concentrated, mainly, on the operative exchange of financial information with similar services from other jurisdictions through the secured channel Egmont Secure Web, contributing in this regard to supporting the financial analyses and cross-border investigations.

Through constant participation at the events organised by the Egmont Group, the Office is developing the professional competences of its staff, especially in fields such as financial analysis, use of high technology, identification of complex money laundering schemes and international cooperation. These activities contribute to the consolidation of institutional and analytical capacities of the Office, by enhancing the efficiency in detection, analysis and dissemination of financial information, as well as supporting the activity of law enforcement agencies.

Country	↓ Requests Received	↑ Answers Transmitted	↑ Requests Transmitted	↓ Answers Received
Romania	3	3	28	46
Lithuania	1	1	13	16
Seychelles			8	6
Latvia	1	1	5	5
UAE			5	8
Ukraine	3	3	4	7
Italy	2	1	4	2
Turkey	1	1	4	5
USA			4	5
Great Britain		1	4	7
Bulgaria	1	1	3	4
Georgia	1	1	3	3
Portugal			3	4
France			3	3
Kuwait			3	3
Malta	4	4	2	5
Poland	1	1	2	4
Cyprus			2	3
Greece			2	3
Estonia			2	2
Hong Kong			2	2
Netherlands			2	2
Ireland			2	1
Germany	2	1	1	1
Hungary	1	1	1	2
Syria	2	2		
Other jurisdictions	10	11	10	15
<b>TOTAL</b>	<b>33</b>	<b>33</b>	<b>122</b>	<b>164</b>

### EGMONT correspondence

Jurisdictions with which spontaneous information exchange (SI) was carried out



## External Assistance

In the context of increased money laundering and terrorist financing risk, including as a result of the development of the virtual assets and of cross-border financial flows, the consolidation of institutional capacities and international cooperation represented a strategic priority. In this regard, the Office benefited from a complex support from several external partners. Their contribution targeted both the operational and technical dimension, as well as the strategic and normative, having as a common objective the consolidation of institutional capacities, the development of professional competences and the alignment of the national system for preventing and combating money laundering and terrorist financing with international and European standards.

### Study visits and exchange of experience 1

These activities allowed direct familiarization with the institutional and operational models applied by similar authorities, including inter-institutional cooperation mechanisms, the use of financial information in investigations and the risk-based approach. The participation in international conferences and platforms facilitated the exchange of experience, the development of professional relationships and the understanding of emerging trends in the field of preventing and combating money laundering and terrorist financing.

### 2 Training, workshops and formation programmes

The training activities were aimed at developing the practical and analytical skills of the staff, covering complex areas such as financial transaction analysis, blockchain investigations, concealment techniques and identifying risks associated with virtual assets. They included theoretical sessions and practical applications, contributing to the consolidation of institutional capacities.

### 3 Development of analyses, reports and methodological products

Analytical products and technical documents were developed to support the decision-making and the public policy development. These included the national risk assessment and the practical guideline for the application of the normative framework. The results contributed to a better understanding of the system's vulnerabilities and the definition of intervention priorities.

### Institutional development and normative support 4

The interventions targeted the improving of the legislative and institutional framework by examining the draft normative acts, identifying gaps and formulating recommendations for the alignment with international standards and the European Union acquis. At the same time, the cooperation between national institutions was consolidated, including by clarifying the roles and responsibilities and improving the information exchange mechanisms.

### 5 Training Centre in the field of preventing and combating money laundering and financing of terrorism

The process of establishing a national continuous professional training and certification mechanism was supported, through the development of a structured curriculum, adapted to the needs of the obliged entities. This is aligned with international standards and the national legal framework and aims to ensure a uniform level of professional training in the field.

### 6 Technical assistance and equipment with hardware and software tools

It included the modernization of the Office's critical infrastructure (servers and workstations) and the implementation of modern technological solutions for financial data analysis and identification of suspicious transaction, including specialized tools for blockchain analysis. These contributed to increasing the information processing and analysis capacity, as well as to streamlining the Office's operational activities.

# Key priorities

## European Integration

The European integration of the Republic of Moldova represents a national strategic priority, and the Office consistently played an important role in achieving this goal. During 2025, the institution launched a series of actions aimed at consolidating the European integration process and continuing the necessary preparations for the accession of the Republic of Moldova to the European Union, the Office's contribution being oriented particularly at negotiation chapters such as Chapter 4 "Free movement of capital" and Chapter 24 "Justice, freedom and security".

During the reference period, the Office aimed to continue the process of legislative and institutional harmonization with the European Union acquis, by promoting essential reforms in the field of preventing and combating money laundering and terrorist financing, as well as by consolidating the inter-institutional and international cooperation mechanisms. Among the major objectives were the following:



Initiating the process for transposing the provisions related with the EU 6th package in the field of preventing and combating money laundering and terrorist financing, in order to align the national normative framework with the new European standards



The consolidation of the institutional and operational framework of the Office, through the development of analytical and operational capacities, including through the implementation of modern information systems, as goAML, in order to ensure the efficiency in processing and analysing the financial information

Contributing to the development of the national strategic framework, through the creation of the National programme in the field of AML/CFT for the period of 2026-2030, in accordance with the European integration objectives



Creation of a training centre in the field of preventing and combating money laundering and terrorist financing, designated to ensure a continue professional formation process for the obliged entities, bodies with supervision functions of obliged entities, as well as other interested parties

By achieving these objectives, the Office will contribute to consolidate the national framework for preventing and combating money laundering and terrorist financing, increase the efficiency of institutional mechanisms and progressively align the Republic of Moldova with European Union standards, thus facilitating integration into the European space.

## Implementation of the goAML information system

In 2025, the Office has taken an important step in modernising the information infrastructure and consolidating the operational capacities of the Financial Intelligence Unit. With the financial support of the Government of the United Kingdom of Great Britain and Northern Ireland, an agreement was signed with UNODC regarding the installation and maintenance of the goAML information system.



The goAML system is an advanced IT solution, developed by UNODC for Financial Intelligence Units, used internationally to manage the reporting, collection, processing and analysis of financial information. Its implementation aims to streamline reporting, strengthen analytical capabilities and improve cooperation with competent authorities.

During 2025, the goAML implementation was oriented on adapting the system to the institutional needs and the national framework. Adjustments were made to the XML scheme, configuration and customisation of the system, installation on the internal infrastructure, as well as the preparation of the testing environment for verification and piloting.



An important element was the development of documentation and methodological tools for using the platform. Instructions were developed for the obliged entities and were adjusted the internal processes, for system integration and optimization of data reception, validation, processing and data analysis.

As part of the goAML+ support package, funded by the Government of the United Kingdom, the UNODC experts delivered 8 training sessions for the employees and obliged entities. These were focused on the practical use of the system, familiarization with the functionalities and preparation for testing and transition to the new mechanism.



Starting with 2026, the Office is planning the piloting phase in the test environment, in cooperation with selected entities, followed by the preparation of the migration to the production environment. The transition is planned after the completion of the piloting and validation of the system.

The implementation of goAML represents a strategic project, oriented towards digitalizing the reporting, increasing data quality, streamlining the financial analysis and aligning with international best practices in preventing and combating money laundering and terrorist financing.



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