

Anti-money laundering and counter-terrorist financing measures - Norway



# 8. International cooperation

Effectiveness and technical compliance

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## **Key Findings**

- The system in place for mutual legal assistance between Nordic and European Union (EU) countries is straightforward and dealt with directly between the competent judicial authorities in accordance with the Nordic Agreement and the EU 2000 Convention. In addition, Nordic arrest warrants are forwarded directly between the competent judicial authorities in accordance with the Convention on the Nordic Arrest Warrant.
- International cooperation between Norway and its Nordic partners is very close, uncomplicated and dealt with quite speedily. In addition, formal cooperation between Norway, European Economic Area (EEA) and non-EEA countries is working well. The legal framework for mutual legal assistance and extradition is generally broad. The only deficiencies relate to enforcement of non-conviction based confiscation orders and the requirement to start domestic proceedings rather than enforce a foreign order.
- With respect to other forms of cooperation, the financial intelligence units (FIU), law enforcement agencies (LEAs) and the Customs Authority are well engaged in international cooperation with their counterparts, both upon request and spontaneously.
- The Norwegian police are very involved in cooperation with Nordic and EU countries to strengthen and improve the fight against international crime, including for money laundering (ML), associated predicate offences and terrorist financing (TF). However, they have noted that the potential for them to obtain information from abroad has not been fully exploited.
- There is a sound legal framework in place to allow the FSA to exchange information with foreign counterparts in the financial sector, but so far the FSA's international information exchange has not focused on AML/CFT matters, nor has it been extended to non-financial sector anti-money laundering / counter-terrorist financing (AML/CFT) counterparts.
- Norway does not maintain comprehensive statistics on mutual legal assistance and extradition which makes it difficult to assess the effectiveness of their international cooperation, and the assessment team has had to rely on qualitative information in this regard. It is noted that the Norwegian authorities did not follow up on any of the specific recommendations included in the 2005 Mutual Evaluation Report regarding this kind of statistics, namely that Norway should keep statistics concerning: (i) the number of requests; (ii) the nature of requests; (iii) whether requests were granted or refused; (iv) what crime the requests were related to; and (v) how much time was required to respond to the requests

### 8.1 Background and Context

8.1. Norway's closest partners regarding both formal and informal international cooperation are the Nordic and EU countries. The legal framework for mutual legal assistance and extradition is generally broad as outlined below. The MoJ is the designated central authority for mutual legal assistance and extradition pursuant to a number of conventions, including, the European Convention on Mutual Assistance in Criminal Matters, 1959; the UN Convention against Transnational Organized Crime, 2000; the UN Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic Substances, 1988 and the UN Convention Against Corruption, 2003. However a lot of the cooperation with Nordic/EU/Schengen countries takes place directly between prosecutors.

### 8.2 Technical Compliance (R.36-40)

### Recommendation 36 - International instruments

8.2. Norway is rated compliant (C) with Recommendation (R.) 36. Norway has signed and ratified the Vienna, Palermo, Terrorist Financing and Merida Conventions, and has implemented those Conventions as required under the FATF Standards. Norway has also signed and ratified the Council of Europe (Strasbourg) Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime 1990, but not the more recent Warsaw Convention 2005.

### Recommendation 37 - Mutual legal assistance

8.3. Norway is rated largely compliant (LC) with R.37. The legal basis for Norway's mutual legal assistance regime is found in laws such as the *Extradition Act* (*EA*), the *Courts of Justice Act*, and the *Regulations relating to International Cooperation* in *Criminal Matters 2012* (*Regulations on International Cooperation*). Other laws such as the *CPA* may be used in response to foreign requests to the same extent and on the same basis as in domestic cases, and apply fully to ML, associated predicate offences and TF. Assistance can be provided irrespective of whether there is a treaty. However, if assistance through coercive measures are sought then dual criminality applies (unless it is a Nordic country). Dual criminality is based on whether the conduct underlying the offence is criminalised in Norway and the requesting country. The legal powers are broad, do not contain any unreasonable restrictive conditions, and appear sufficient to respond to almost all foreign requests (see also R.38). The Ministry of Justice (MoJ) is the designated central authority for mutual legal assistance, though requests can also be sent directly between judicial and law enforcement authorities in Nordic and European Union countries. The MoJ monitors requests in the case management system, *Websak*. However, this does not include requests made directly from or to other authorities. Although there are no specific confidentiality requirements relating to mutual legal assistance requests, all concerned authorities have confidentiality requirements under their own internal or national security protocols.

### Recommendation 38 – Mutual legal assistance: freezing and confiscation

Norway is rated LC with R.38. Norway does not have specific legal requirements concerning the enforcement of foreign freezing, seizing or confiscation orders but relies on domestic powers such as those in the *CPA*. Where a foreign state is a signatory to the Vienna, Strasbourg or Merida Conventions, and seeks assistance under those conventions, then Norway can recognise and enforce the foreign order directly. However, if that is not the case then Norway cannot give effect to the foreign order directly but must start its own proceedings. This applies to all property that is the proceeds of or an instrumentality of ML, predicate offences and TF. Norway's laws do not refer to the enforcement of foreign non-conviction based (NCB) confiscation orders, and domestically, the requirement to use the criminal standard of proof under s.34 would mean that NCB orders could not be enforced. As regards other measures in place, it is possible to share assets with other countries, but there is no mechanism for managing property that has been seized or confiscated.

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#### Recommendation 39 - Extradition

- 8.5. Norway is rated LC with R.39. Any person who is charged, accused or sentenced by a foreign state for a punishable act may be extradited in accordance with the *EA*. Both ML and TF are extraditable offences. Extradition with other Nordic countries is governed by the *Convention on the Nordic Arrest Warrant* which entered into force on 16 October 2012. Extradition to all other countries is regulated in the *EA*, and may only take place if there is dual criminality and the offence is punishable under Norwegian law with imprisonment for more than one year. A difference in the classification or denomination of the offence does not affect the dual criminality principle. There are clear procedures for timely execution of extradition requests, and judicial authorities have case management systems in place to track extradition requests. However, this does not include requests made directly from or to other authorities.
- 8.6. Norway does not extradite its nationals to non-Nordic countries. When extradition is refused because the person in question is a Norwegian national, proceedings can be brought in Norway. Simplified procedures for extradition are in place with other states parties to the *Schengen Convention*, such as direct transmission of extradition requests between the appropriate ministries. There are also simplified procedures to extradite consenting persons for both Nordic and non-Nordic countries.

### Recommendation 40 – Other forms of international cooperation

8.7. Norway is rated LC with R.40. Norwegian legislation allows for a wide range of information exchange with foreign authorities for preventing and detecting criminal acts. There is no legal impediment for information to be exchanged both spontaneously and upon request. The FSA is able to provide assistance to foreign supervisory counterparts without the need of a Memorandum of Understanding (MOU). The FIU has a sound legal basis for the exchange of information with its foreign counterparts and has mechanisms for cooperation and responds adequately to requests. Where possible, information is sent and received via the Egmont Secure Web. Norwegian LEAs have appropriate powers and mechanisms to cooperate with foreign competent authorities, especially the Nordic countries and countries in the EEA. Finally, customs authorities do not have secure gateways for the transmission and execution of requests.

### 8.3 Effectiveness: Immediate Outcome 2 (International Cooperation)

8.8. The lack of detailed risk information regarding transnational aspects of ML presents a challenge to effective implementation. While the National Risk Assessment (NRA) has only general information regarding transnational risks, the National Criminal Investigation Service (KRIPOS) and National Authority for Investigation and Prosecution of Economic and Environmental Crime (ØKOKRIM) threat assessments include some information regarding risks from Nordic countries, EU countries and other countries and regions including organised crime risks from the Baltic region and West Africa.

### Mutual legal assistance and Extradition

8.9. Nordic and EU-countries are Norway's most important partners in international cooperation, especially in relation to mutual legal assistance and extradition. Mutual legal assistance requests between Norway and Nordic and EU/Schengen-countries are mostly sent directly between the judicial authorities in accordance with the Nordic agreement and the EU 2000-Convention. This provides for simplified and less time consuming procedures with requests and responses sent directly from prosecutor to prosecutor. The only negative aspect that the assessment team identified is that these requests are not centrally registered and no comprehensive statistics are available which could assist in the assessment of effectiveness. Importantly, Norway does not keep statistics on the crime type of mutual legal assistance and extradition matters and it is therefore the number of matters relating to ML/TF cannot be determined. However, feedback received from other Nordic countries indicates that, in general, this direct exchange of information works well and it is rapid and uncomplicated. This statement is particularly true for cooperation with prosecutors and LEAs in the Oslo police district.

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- 8.10. The MoJ is the designated central authority pursuant to a number of EU and UN Conventions on which Norway heavily relies for providing and requesting mutual legal assistance. In addition, Norway has two formal bi-lateral mutual legal assistance treaties. For countries where there is no formal agreement, Norway follows the provisions in Chapter 5 of the EA which state that such requests shall be complied with wherever possible. In practice, assistance not based on formal agreements is generally provided. Norwegian authorities indicated that the lack of bilateral agreements is seldom an impediment for successful cooperation and it takes a very flexible approach when providing assistance to countries which are not a party to the Conventions or a bilateral treaty. Norway has an open and constructive approach in providing mutual legal assistance which enhances its effectiveness. This was confirmed by the feedback received from 18 countries. The majority of the countries which responded did not present any information which stated that they have encountered problems with cooperation with Norway¹.
- 8.11. Norway has taken action to ensure that mutual legal assistance is provided in a timely manner and the *Regulations on International Cooperation in Criminal Matters* referred to above guide both the central and regional authorities on how to deal with requests, including prioritisation of requests, follow-up on ongoing requests, and the timing of responses. These are supplemented by the circular letter on International Cooperation in Criminal Matters issued by the MoJ. In addition, to ensure the prioritisation of the requests it receives, the MoJ has introduced a routine whereby the MoJ sends a reminder of the request to the competent Norwegian authority after three months. While no official statistics are available with regard to the time it has taken Norway to respond to mutual legal assistance requests, the authorities indicated that even the more complicated requests were fully satisfied within 12-18 months (at most). Norway has specific procedures in place to deal with urgent requests and it is common practice that these are submitted via INTERPOL channels and confirmed via formal channels shortly afterwards.
- 8.12. Norway has also shown that it is actively engaged in seeking mutual legal assistance. An increasing number of larger and more complex cases have international ramifications and proceeds and/or evidence are often not present in Norway. Norway has provided examples of economic crimes where assistance has been successfully sought, both on evidence gathering and on asset tracing and freezing.

### Box 8.1. International cooperation: the *Gruben case*

The *Gruben case* the laundering in Norway of proceeds which were generated from tax offences committed abroad. Large cash exchanges from NOK to Euro were conducted in various banks and exchange offices in the Oslo-area by people linked to the defendant and were reported as suspicious transactions to the FIU. ØKOKRIM was responsible for this investigation and identified some ML aspects in Norway, including through STRs received by the FIU, evidence on international financial transactions. The predicate offence could only be identified through international assistance as the proceeds were derived from investments abroad. This led ØKOKRIM to undertake significant engagement with other countries through informal contact and formal mutual legal assistance requests to determine the source of the funds. The mutual legal assistance received from other countries led to a successful ML conviction relating to the proceeds of tax evasion, estimated to NOK 17 million (EUR 2.2 million) (as at the time of the on-site visit the case was on appeal). The defendant was sentenced for ML to 3 years and 6 months in prison.

Armenia; Austria; Australia; Belgium, Canada; France; Greece; Hong Kong, China; Ireland; Isle of Man, UK; Japan; Macao, China; Mexico; Russia; San Marino; Slovenia; Sweden; and United States.

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- 8.13. In order to support and strengthen coordination in serious cross-border crime, Norway has entered into an agreement with Eurojust. In accordance with the agreement, Norway has seconded a Liaison Prosecutor to Eurojust. Eurojust has proved to be a valuable counterpart and facilitator when dealing with mutual legal assistance. ØKOKRIM has several investigations where Eurojust has been of assistance. In this context, joint investigation teams appear to help and have had a positive impact on the effectiveness of Norway's international cooperation.
- 8.14. As explained above, simplified procedures for extradition are in place for states which are parties to the *Schengen Convention* and for Nordic Arrest Warrants. The Nordic system of arrest warrants has been inspired and influenced by the development of the European Arrest Warrant scheme. Under each of the regimes, there are strict time limits for decisions regarding extradition and few grounds for refusal. Norway has signed three bilateral treaties in respect of extradition. However, according to the Extradition Act, extradition may take place irrespective of the existence of an extradition treaty between the parties. It has not been shown that Norway's lack of bilateral treaties has been an impediment to cooperation in this area. Also, as with mutual legal assistance, the quality and assistance provided by Norway in the context of extradition appears to be good. Information supporting this statement was received from international partners, especially the Nordic partners. The circular letter cited above deals with extradition requests, including on prioritisation of requests and timeliness in responding. It normally takes from six months to one year to decide on and execute an extradition request; this depends on the complexity of the case and how often the decisions of the courts and the MoJ are appealed. During the on-site the team was advised that the longest time that Norway had taken to execute an extradition request was three years. However, simplified extradition procedures normally only take two to three months.
- 8.15. ML and TF are extraditable offences. Norway does not extradite its nationals to non-Nordic countries. However, when extradition is refused on this basis, the case can be dealt with in Norway. There are no statistics to rely on how often this has already happened. In practice, the Norwegian Interpol and Sirene office informs the state that has issued an alert, at an early stage, that Norwegian nationals will not be extradited. Consequently, there are not many such requests for extradition. However, Norwegian nationals have been prosecuted in Norway for offences committed abroad because of the lack of possibility to extradite. Usually the requesting state has to ask the Norwegian authorities to prosecute the matter.

### Other forms of international cooperation

- 8.16. With the exception of the FSA, most of Norway's competent authorities are well engaged in international cooperation with foreign counterparts. Norway's FIU is actively involved in direct and indirect information exchange, especially on behalf of domestic LEAs, and promotes this tool when coordinating and cooperating with other domestic authorities. In addition, Norway's competent authorities provide very little feedback to their international counterparts regarding the usefulness of the information provided and that the value the information received has added to the domestic processes.
- 8.17. Norway's FIU is well engaged in information exchange with its foreign counterparts as part of its analytical process. Collecting information from foreign counterparts is one of many sources of information the FIU uses (see R.29 and IO.6 above). The FIU also responds to requests from foreign FIUs and it uses all of the information sources available to it. Overall, positive feedback was received from the FIU's foreign counterparts regarding the nature and level of cooperation provided.
- 8.18. The FIU has assigned the information exchange with foreign partners to one of its analysts. Centralising requests received ensures that the FIU responds to foreign requests within a reasonable amount of time (maximum one month) and gives priority to urgent requests which are answered within the timeline sought by the foreign partner. In addition, specific expertise in dealing with requests from foreign FIUs is developed. While the FIU is also engaged in spontaneous information exchange, the majority of requests sent and received can be categorised as upon request. Information exchange with foreign FIUs takes place via the Egmont Secure Web which provides a secure gateway. The FIU also keeps comprehensive statistics regarding its information exchange, including regarding timing of responses, which provide a good basis for the assessment of effectiveness. In addition to quantitative information, the FIU was able to present

- 8.19. The FIU plays an important role in facilitating indirect information exchange between competent authorities. It reaches out on behalf of LEAs, especially other teams within ØKOKRIM and PST. The FIU provided the team with the necessary assurances that foreign counterparts are always aware when a request is formulated on behalf of a LEA. The FIU also provided several case examples to show how indirect information exchange is used as an important source of information for LEAs. One of these examples relates to the Anders Behring Breivik case and the information provided demonstrates that the Egmont cooperation was a very useful tool for receiving information from other countries in a swift, safe and efficient way. Several foreign FIUs were approached and this resulted in the collection of very useful information concerning Breivik's financial activities in other countries. At least seven of those answers proved to be so useful that the police immediately engaged in formal mutual legal assistance with the countries concerned for use of the information as evidence in the criminal case.
- 8.20. The Norwegian FIU does not require an MOU in order to cooperate with foreign FIUs. Therefore, the FIU does not actively seek to sign MOUs. It does, however, recognise that other FIUs may need to have an MOU in place for the exchange of information and tries to comply with the needs of other FIUs in this regard. The FIU has signed 10 MOUs with foreign FIUs.
- 8.21. KRIPOS plays a central role in international police cooperation, and has an important responsibility with regard to coordination of information with various foreign LEAs and relevant arenas of police cooperation, such as INTERPOL. KRIPOS is also Norway's central point of contact for foreign LEAs, and provided the assessment team with feedback indicating that, overall, the local police districts and the various teams within  $\emptyset$ KOKRIM take a positive approach when providing necessary assistance to foreign police. Some supporting case examples have been provided in relation to ML/TF and associated predicate offences. However, there are some examples where lack of resources at the local level and/or different priorities may have hindered the provision of full support needed by foreign authorities.
- 8.22. The ML Unit at ØKOKRIM provided the assessment team with several examples indicating how international cooperation has been both effective and efficient, both from the requesting and providing side. Some of these cases have also involved the repatriation of confiscated assets/sharing of assets with other jurisdictions (see Box 3.5 & 8.1). International assistance can be provided quickly and money can be seized relatively easily but the formal procedures that need to follow take much more time to complete. While international information exchange by ØKOKRIM is intensive, this is not necessarily reflected in statistics, especially not when it involves exchange of information with neighbouring countries. However, based on the different material and information that has been provided it appears that there is a high level of international cooperation and related expertise shown by ØKOKRIM's ML Unit.
- 8.23. The PST is extensively engaged in international information exchange. It cooperates both bilaterally and multilaterally with police and security authorities in a number of countries. Cooperation with other intelligence services is based on regular meetings with PST's main counterparts, and also on more thematic and case based meetings with other counterparts in different countries.
- 8.24. The PST is also a member of a European security partnership, the Club of Bern. In order to strengthen its efforts against Islamist terrorist activities, in 2001 the club of Bern established a separate co-operation forum called the Counter Terrorist Group, in which PST participates. PST also represents Norway in NATOs Special Committee and in the Police Working Group on Terrorism and is in liaison with foreign police authorities through Norwegian membership of Interpol, Europol and Eurojust.
- 8.25. Operational cooperation takes place on a daily basis, including in relation to general operational intelligence and law enforcement investigations. The exchange of information appears to be fast and efficient, and there are routines on how quickly the requests shall be replied to. The PST provided information on several cases to illustrate its successful engagement in international cooperation.
- 8.26. One of the cases was a covert operation carried out from 2007. This was an investigation of an extreme Islamist network operating in Norway and providing financial and logistic support to Al-Shabaab. It involved

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the cooperation of and parallel investigation carried out by three FATF member countries. As a result of a coordinated operation, two persons were arrested in Sweden at the same time as the arrest of the Norwegian suspects. In another matter, PST arrested three individuals on 8 July 2010, charged with conspiracy to commit a terrorist act. The investigation lasted for more than 3 years. There was broad cooperation with other law enforcement agencies. During the investigation PST carried out interrogations in 5 different countries. In court (in Oslo), the prosecution had witnesses from these other countries. Two persons were found guilty of entering into terrorist conspiracies and received 8 years and 3 years prison sentences. Another was found guilty of contributing to making explosives which were to be used in a criminal act and was sentenced to 120 days of imprisonment.

- 8.27. Norwegian Customs and Excise participate in different international operations regarding detection of cash smuggling. Participation in these operations focusses on sharing of information with domestic LEAs and internationally with foreign customs authorities. Norwegian customs authorities appear to have good experience in sharing of information with other customs authorities about persons declaring cash leaving Norway in order to detect if cash is declared entering into the indicated destination country. Norway provided the assessment team with several case examples, especially the Athena and Atlas cash smuggling operations, which led to successful seizures of cash both in Norway and abroad.
- 8.28. On the basis of the EEA-agreement therefore there are no barriers to exchange information for regulatory purposes between Norway and other EEA countries. Based on a Nordic MoU there is formalised contact between the FSA and other Nordic financial supervisory authorities, such as annual meetings, regular sector specific meetings and expert meetings but there are no examples of discussions on AML/CFT supervision at any of these meetings.
- 8.29. The FSA also has bilateral MoUs with counterparts in some European countries, India, US and Russia. In addition, the FSA has a multilateral Cooperation and Coordination Agreement on the prudential supervision of a large Nordic financial group. None of these are directed at AML/CFT supervision and Norway has been unable to provide information on how these channels have been used for AML/CFT supervision. In addition to the limited formalised international work, cooperation takes place on an ad hoc basis though this is not usually initiated by Norway. For example, subsequent to a request from the Swedish FSA to develop a standard procedure for AML supervision of a major Nordic bank (still under development), the FSA carried out an inspection in that bank focusing on beneficial ownership and the origin of customers' assets. The result was presented for Nordic supervisory authorities in 2012.
- 8.30. In 2011, the FSA in coordination with supervisory authorities from Sweden and Denmark contacted the relevant supervisory authority in Ireland with the purpose of initiating cooperation over the supervision of agents of a payment service provider authorised in Ireland and operating in the Nordic countries. However, no formalized cooperation was established and no inspections of agents have been carried out in Norway. This attempt did fail, however, and the FSA has not followed through in relation to entering into cooperation with the home supervisor (See IO.4 above).
- 8.31. In the context of international cooperation, outside of formal EEA structures and ad hoc exchanges, Norway was able to provide very limited information on how it sought or provided exchange of information to foreign supervisory counterparts for AML/CFT purposes. With the exception of the single outreach to the home supervisor of the MVTS provider, the FSA has not engaged in any AML/CFT specific exchange of information.

#### Conclusion on IO.2

8.32. Norway's system for international cooperation demonstrates many of the features of an effective system. The lack of statistics relating to international cooperation makes it difficult to assess, but based on qualitative information it is clear that Norway takes an open and collaborative approach to international cooperation. The method of international cooperation varies due to the level of engagement which is to be expected, but there is strong cooperation with Norway's close partners, such as the Nordic states, where cooperation is close, uncomplicated and dealt with speedily. This includes through the use of Nordic arrest warrants, which are forwarded directly between the competent judicial authorities. Norwegian LEAs are very involved in cooperation with EEA countries under the EU framework for cooperation, including for ML,

8.33. Norway has a **substantial level of effectiveness** for IO.2.

## 8.4 Recommendations on International Cooperation

- a. Norway should, as a matter of priority (noted in the 2005 MER), have a data and case management system that would enable the authorities to keep statistics on all mutual legal assistance and extradition concerning: (i) the number of requests; (ii) the nature of requests; (iii) whether requests were granted or refused; (iv) the type of crime to which the requests relates; and (v) how much time was required to respond to the requests.
- **b.** Norway should prioritise implementation of measures for international cooperation in keeping with identified risks.
- c. Norway should establish a clear legal basis for the enforcement of foreign freezing/seizing/ confiscation orders when they are formulated under a request made by a foreign state under any treaty to which Norway is a signatory.
- **d.** The FSA should prioritise and support international cooperation on regulation and supervision of FIs and DNFBPs commensurate with the risks faced by Norway. In particular, the FSA should:
  - establish and use clear and secure gateways and mechanisms that will facilitate and allow for the transmission and execution of requests. In addition, the FSA should broaden its assistance to international supervisors for all types of FIs and DNFBPs it supervises.
  - work with European partners to establish an effective supervisory regime for passported FIs, and in particular the MVTS sector.
- **e.** Noting the risks outlined in the NRA, Customs authorities should prioritise international cooperation, including setting up and using secure gateways for the transmission and execution of their requests.
- f. Norway's competent authorities should provide feedback to their international counterparts regarding the usefulness of the information provided and the value of the information received added to their domestic processes.



### Recommendation 36 - International instruments

- a8.1. In the  $3^{rd}$  Mutual Evaluation Report (MER) Norway was rated LC with the requirements to sign, ratify and implement international conventions (due to deficiencies in the ML offence and preventive measures) and PC concerning the TF Convention and UNSCRs (due to deficiencies in relation to the UNSCRs). Norway has made progress in addressing the ML offence and the UNSCRs are dealt with in R.6.
- a8.2. **Criterion 36.1** Norway is a party to the Vienna, Palermo, Merida and Terrorist Financing Conventions. Norway is not a party to the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (2005), although it has signed and ratified the predecessor Strasbourg Convention (1990). However, Norway ratified the Council of Europe Convention on Cybercrime (2001) on 30 June 2006.
- a8.3. **Criterion 36.2** Norway has fully implemented the relevant articles of the Vienna, Palermo and TF Conventions by addressing the remaining deficiencies identified in the 3<sup>rd</sup> MER concerning the ML offence and preventive measures. It should be noted that the Convention requirements do not encompass all the FATF requirements. Norway has also implemented the Merida Convention.
- a8.4. Weighting and conclusion: Norway is rated C with R.36.

### **Recommendation 37 - Mutual legal assistance**

- a8.5. In its 3<sup>rd</sup> MER, Norway was rated LC with requirements relating to mutual legal assistance. The main deficiency was the application of dual criminality to requests relating to ML/TF activities not fully criminalised in Norway.
- a8.6. **Criterion 37.1** Norway does not have a separate mutual legal assistance act and the legal basis is found in different laws and regulations, such as the *Extradition Act (EA)* in Chapter V, the *Courts of Justice Act* in Chapter 2, and the *Regulations relating to International Cooperation in Criminal Matters, December 2012 (Regulations on International Cooperation)*. Norway's laws (e.g., *PC* and *CPA*) may be employed fully in response to foreign requests and may be used to the same extent as in domestic cases. The legal framework in relation to mutual legal assistance does not differentiate between categories of offences and is in principle the same for ML, predicate offences and TF. Norway may provide assistance irrespective of the existence or applicability of a treaty: *EA* s.26(3).
- a8.7. **Criterion 37.2** The *Regulations on International Cooperation* (ss.3 and 10) and the *EA* s.23a designate the MoJ as the central authority for mutual legal assistance. In addition, requests can be sent directly to judicial authorities from Nordic and EU countries (s.3a-d) pursuant to the *European Convention on Mutual Assistance in Criminal Matters* and the *Convention on Mutual Assistance in Criminal Matters between Member States of the European Union*. The MoJ maintains a case management system called *Websak*. However, this records only requests made through the MoJ and not those made directly from or to other authorities. When Norway is notified of urgent cases, incoming requests may be transmitted through formal channels and through Interpol. Requests for assistance in criminal matters are prioritised: *Regulations on International Cooperation* s.5.
- a8.8. **Criterion 37.3** The system for providing mutual legal assistance to Nordic countries is straightforward and not subject to unduly restrictive conditions. The system for mutual legal assistance to EU or Schengen countries is also very streamlined as it allows for direct law enforcement to law enforcement assistance. In all cases involving mutual legal assistance requests from non-Nordic countries (where coercive measures are being sought), dual criminality applies.
- a8.9. **Criterion 37.4** There is no rule under Norwegian law that a mutual legal assistance request must



be refused if the offence is considered to involve fiscal matters, or due to secrecy or confidentiality.

- a8.10. **Criterion 37.5** There are no specific confidentiality requirements relating to the information in mutual legal assistance requests. However, judicial authorities such as the MoJ, courts and LEAs have confidentiality requirements under their own internal or national security protocols.
- a8.11. **Criterion 37.6** Where the measure sought is not a coercive measure, there is no requirement for dual criminality: *EA* s.23a(5). There is also no dual criminality requirement even if coercive measures are required if the mutual legal assistance request originates in a Nordic country.
- a8.12. **Criterion 37.7** Where dual criminality is required for mutual legal assistance, it is sufficient that the conduct underlying the offence is criminalised in both Norway and the requesting country. A difference in the classification of the offence does not affect the dual criminality principle: *EA s.24*. For Nordic countries no dual criminality is required. There is a deficiency with the TF offence since the collection of funds in the knowledge that they are to be used by a terrorist organisation or an individual terrorist (for any purpose) is not criminalised as a stand-alone offence. However, the underlying conduct is criminalised as an attempt to make funds available to terrorists or terrorist organisations (*PC* s.147b), or as an attempt to provide financial or material support to terrorist organisations when the organisation has taken steps to realise the purpose by illegal means: *PC* s.147d. Therefore, given that the conduct is criminalised, the deficiency with the TF offence does not apply to R.37 as the classification of the offence does not affect dual criminality requirements.
- a8.13. **Criterion 37.8** The underlying basis for the mutual legal assistance system in Norway is that a request from a foreign country should be handled in the same way and using the same means as if it were an investigation being carried out by a Norwegian authority. The result of this is that law enforcement authorities may use their powers to obtain information based on their enabling legislation or the *CPA* when executing a request from abroad.
- a8.14. **Weighting and conclusion:** The deficiency in the TF offence has a spill-over effect as it may limit assistance due to dual criminality requirements. **Norway is rated LC with R.37**.

### Recommendation 38 - Mutual legal assistance: freezing and confiscation

- a8.15. In its 3<sup>rd</sup> MER, Norway was rated PC for confiscation assistance. The main deficiencies were that Norway must start its own domestic proceedings to allow for confiscation in situations other than those covered by the Vienna and Strasbourg Conventions.
- a8.16. **Criterion 38.1** Where a foreign state (that is not a signatory to the Vienna, Strasbourg or Merida Convention) requests Norway to execute a foreign freezing/seizing/confiscation order (including NCB confiscation), Norway can recognise the order, but cannot give effect to it without starting its own proceedings. Regarding confiscation, this could delay any action taken. If a foreign country is a signatory to the Conventions, there is no requirement for Norway to start its own proceedings. In other cases, Norway would need to provide mutual legal assistance, which does not need a treaty, and open its own proceedings.
- a8.17. **Criterion 38.2** Norway's laws do not refer to the enforcement of foreign NCB confiscation requests. Norway considers that NCB confiscation could be available pursuant to a foreign request under *PC s.34*. As noted under R.4 above, although not entirely clear, it appears that some form of NCB confiscation may be possible, but with stringent preconditions. Extended confiscation requires a criminal conviction: *PC* s.34a. Property can be confiscated without a conviction (both domestically and pursuant to a request) when there is a risk that it could be used to commit a crime, or when the owner is unknown or has no known residence in Norway: *PC* s.37b&c.
- a8.18. **Criterion 38.3** There are no formal pre-existing arrangements for coordinating seizure and confiscation actions with other countries, but Norway has a series of national contact points which allow it to co-ordinate appropriately. As with domestic confiscation, there is no specific mechanism through which Norwegian authorities manage certain types of property that has been frozen, seized or confiscated. The LEA that seizes the property is responsible for managing the property, including disposal.



- a8.19. **Criterion 38.4** The MoJ may decide to share confiscated assets with other countries: *PC* s.37d.
- a8.20. **Weighting and conclusion:** The restriction on the ability to expeditiously enforce a foreign confiscation order, and the lack of a mechanism to manage confiscated property are minor deficiencies. **Norway is rated LC with R.38**.

#### Recommendation 39 - Extradition

- a8.21. Norway was rated LC in its 3<sup>rd</sup> MER for requirements concerning extradition. The main deficiency was the effect of the deficiencies in the ML/TF offences on extradition due to dual criminality requirements.
- a8.22. **Criterion 39.1** Any person who is charged, accused or sentenced by a foreign state for a punishable act, and who is in Norway, may be extradited and ML/TF are extraditable offences: *EA* s.1. Extradition with other Nordic countries is governed by the *Convention on the Nordic Arrest Warrant* of 16 November 2012. Extradition to all other countries is regulated in the *EA*, and may only take place if there is dual criminality and the offence is punishable under Norwegian law with imprisonment for more than one year: *EA* s.3. This means that the limitation in the TF offence has an effect on extradition. There are clear procedures for timely execution of extradition requests, and judicial authorities use case management systems. However, cases handled directly by law enforcement agencies through Nordic arrest warrants are not recorded.
- a8.23. **Criterion 39.2** Norway does not extradite its nationals to non-Nordic countries. When extradition is refused because the person in question is a Norwegian national, the case will (upon request) be forwarded to the Prosecution Authority. If considered appropriate, proceedings may take place, including transmission of information relating to the offence.
- a8.24. **Criterion 39.3** Where dual criminality is required for extradition (i.e. with non-Nordic countries), it is necessary that the conduct underlying the offence has been criminalised in both Norway and the requesting country. A difference in the classification or denomination of the offence does not affect the dual criminality principle: *EA* s.3. There is a deficiency with the TF offence since the collection of funds in the knowledge that they are to be used by a terrorist organisation or an individual terrorist (for any purpose) is not criminalised as a stand-alone offence. However, Norway has advised that the underlying conduct will always be criminalised as an attempt to make funds available to terrorists or terrorist organisations (*PC* s.147b), or as an attempt to provide financial or material support to terrorist organisations when the organisation has taken steps to realise the purpose by illegal means: *PC* s.147d. Therefore, given that the conduct is criminalised, the deficiency with the TF offence does not apply to R.39 as the classification of the offence does not affect dual criminality requirements.
- a8.25. **Criterion 39.4** Simplified procedures for extradition are in place for states such as Norway which are parties to the *Schengen Convention*. This allows the direct transmission of extradition requests between the appropriate ministries. Further, if the subject consents to extradition, the extradition request may be decided and processed by the Public Prosecutor: *EA* s.17a(1). For Nordic states, requests for extradition are forwarded directly between the prosecuting authorities, and there can be a simplified decision regarding the arrest warrant if the person sought consents to the surrender.
- a8.26. **Weighting and conclusion:** The deficiency in the TF offence has an effect as it may limit Norway's ability to provide assistance when dual criminality is required. **Norway is rated LC with R.39**.

### **Recommendation 40 - Other forms of international cooperation**

- a8.27. In its 3<sup>rd</sup> MER, Norway was rated C with these requirements (see paragraphs 440-450). Norway is a party to the EEA Agreement and transposes and implements EEA relevant Acts adopted at EU level.
- a8.28. **Criterion 40.1** As a matter of policy, Norway's competent authorities give priority to rapid exchange of information with international counterparts in combating ML, associated predicate offences and TF. Norwegian legislation allows for a wide range of information exchange with foreign authorities, and there



is no legal impediment for information to be exchanged both spontaneously and upon request.

- a8.29. **Criterion 40.2 Supervisors:** The FSA has the authority to exchange information with foreign counterparts. Under the *FSA Regulations*, the FSA may assist foreign supervisory authorities that make inquiries related to the ordinary discharge of their supervisory functions and powers: *FS Act* s.4(3). There is nothing that would prevent the FSA from using the most efficient means to cooperate. All information sent and received is registered, safeguarded and processed internally according the *Archives Act* and an encrypted mail solution is used when deemed necessary.
- a8.30. **FIU:** The FIU has a sound legal basis for the exchange of information with its foreign counterparts: *MLA* s.30 and *Police Registry Regulation* s.52-5. There are no impediments that would prevent the FIU from using the most efficient means to cooperate. Where possible, information is sent and received via the Egmont Secure Web which provides for a clear and secure channel for the transmission and execution of requests. Most of the FIU's information exchange takes place with other Egmont members. All exchange of information with foreign counterparts is registered in the FIU's database "Ask".
- a8.31. **LEAs:** LEAs are permitted to internationally exchange information which is not related to a specific criminal case: *PA* s.24. There is nothing that would prevent LEAs from using the most efficient means to cooperate. Disclosure of information to foreign LEAs takes place via "*Indicia*", which is a clear and secure gateway. There are clear processes in place to safeguard the information received in criminal cases: *Regulations on International Cooperation*. The protection of the information received is also governed by the *Police Information Registration Act*. The PST can exchange information with foreign police and intelligence authorities, which are approved by the MoJ: *PA* s.17. When the PST investigates cases with international connections, it establishes contacts with foreign counterparts and with Norwegian liaison officers. Intelligence information which is needed as evidence always needs to be confirmed via a formal request through legal channels. The PST gives high priority to foreign requests for information.
- a8.32. **Customs authorities:** The Customs Authority is allowed to share information with other countries' customs and excise administrations: *CA* ss.4, 12-1 and chapter 15. The Enforcement Department in the Norwegian Directorate of Customs and Excise administers all incoming and outgoing requests for assistance, including when they come through customs regions. All cases are registered in an electronic case-handling system which is regularly scrutinised to ensure that cases are dealt with in a timely manner. Urgent requests are given priority. Exchange of information with foreign customs authorities is mostly executed by post and e-mail but in urgent cases, is made by phone or e-mail. The absence of a secure gateway to exchange information is an issue for the secure transmission and execution of requests.
- a8.33. **Criterion 40.3 Supervisors:** The FSA does not need an MOU to assist foreign supervisory authorities, though it has established bi-lateral MOUs when requested. The FSA has bi-lateral MOUs with some European countries; the Reserve Bank of India; the US' Securities and Exchange Commission; and the Central Bank of Russia. The FSA also exchanges information based on multi-lateral MOUs, such as the Nordic MOUs which also provide for supervisory cooperation in relation to supervision of particular financial groups. The FSA also closely cooperates with the three European supervisory authorities to support effective regulation and effective supervision across the single EU internal market.
- a8.34. **FIU:** The FIU does not need an MOU to be able to exchange information with foreign counterparts, but can sign MOUs upon request. The FIU exchanges information based on the Egmont principles of information exchange which require confidentiality and reciprocity, and these principles are covered in the MOUs it signs.
- a8.35. **Law enforcement authorities:** Norway has been a member of Interpol since 1931 and has entered into several agreements with the EU concerning police cooperation. In 2001, Norway signed a cooperation agreement with Europol and has a Norwegian liaison officer at Europol. Communication between the Norwegian police and Interpol and Europol takes place via KRIPOS. Norway has entered into an agreement to the Schengen cooperation in 1999 and to the Prüm Convention (Schengen III agreement) and focusses on combating terrorism. In addition, police are heavily involved in the Nordic Police and Customs Cooperation and have entered into bi-lateral agreements with Russia, Bulgaria and Romania.
- a8.36. Customs authorities: In addition to customs' mutual assistance agreements (Protocol 11 of the

Agreement on the EEA and the Nairobi Convention), Norwegian customs authorities concluded MOUs with Poland (1990), the Russian Federation (1997) and the Netherlands (1998). Norwegian customs authorities also extensively engage in the Nordic Police and Customs Cooperation referred to above. There is nothing what prevents the customs authorities to provide assistance to foreign counterparts in this regard.

- a8.37. **Criterion 40.4** There are no general impediments which would prevent Norwegian competent authorities from providing feedback regarding assistance received, if so requested. Norwegian authorities report to provide feedback to foreign counterparts upon a specific feedback request from the counterpart and provided some FIU specific examples to support this statement.
- a8.38. **Criterion 40.5** Competent authorities do not refuse requests for cooperation solely on the ground that the request is considered to involve fiscal matters nor do they refuse international cooperation on the grounds of secrecy laws or confidentiality requirements. In general, exchange of information is not made subject to unduly restrictive conditions and in on-going proceedings, international cooperation can be provided, unless the assistance would impede the proceeding. Norway reports that the majority of its cooperation agreements allow for the use of information for tax purposes. Finally, cooperation is not dependent on the nature or status of the requesting counterpart authority.
- a8.39. **Criterion 40.6** Competent authorities strictly protect the information received from their foreign counterparts. The FIU and the FSA will only pass on information obtained from foreign counterparts based on express prior consent. LEAs are obliged to keep confidentiality: s.61a *PCA*, s.24 *PA*. Information received from foreign counterparts regarding criminal investigations is mostly obtained by letter rogatory where the question of using the information in court is part of the agreement. When the police obtain information from foreign counterparts which is not specifically related to a criminal investigation, the information is never passed on without prior consent. Customs authorities only pass information to other authorities than the police when prior consent is received: s12-1 *CA*.
- a8.40. **Criterion 40.7** Competent authorities maintain appropriate confidentiality with regard to requests for information received, consistent with privacy and data protection requirements and with confidentiality rules that are applied to information received from domestic sources. Information exchanged should also be subject to confidentiality by the requesting foreign authority. In general, foreign authorities may only pass on information received from Norway with explicit prior approval. Competent authorities will not exchange information if the requesting counterpart cannot assure effective protection of information, including prior authorisation.
- a8.41. **Criterion 40.8** The FSA may assist foreign supervisory authorities with the discharge of their supervisory functions and can use its power to conduct inquiries on their behalf, including in relation to information held by reporting entities. There is no restriction regarding the type of information to be exchanged and it is in a position to exchange regulatory, prudential and AML/CFT information. The FIU can use its powers to collect additional information based on a request from a foreign counterpart; however, as mentioned in relation to R.29 above, this information does not extend to information to be collected from financial institutions, unless the request matches a specific STR. LEAs are authorised to conduct investigations on behalf of foreign counterparts as outlined above.
- a8.42. **Criterion 40.9** See c.40.2 above. The information provided may only be used for intelligence purposes and not as part of a criminal investigation.
- a8.43. **Criterion 40.10** The FIU provides feedback in accordance with the Egmont criteria for feedback between FIUs. Feedback is provided in cases where the counterpart FIU actively seeks feedback, for instance by attaching a feedback form to the information provided.
- a8.44. **Criterion 40.11** The FIU has a wide range of powers to collect information from financial, administrative and police powers and is able to exchange this information with its foreign counterparts.
- a8.45. **Criterion 40.12** As noted in relation to c.40.2, the FSA has the authority to exchange information with foreign counterparts in relation to the ordinary discharge of their supervisory functions and powers: *FS Act* s.4(3). This includes with respect to the exchange of information for the supervision of AML/CFT



#### requirements.

- a8.46. **Criterion 40.13** As indicated above in relation to c.40.8, the FSA can legally exchange information domestically available to it, including client specific information, with its foreign counterparts in the EEA. However, as explained in relation to c.40.2, the FSA can only exchange information with certain counterpart supervisors established outside the EEA. The proportionality principle is not a factor that determines the extent to which the FSA responds to foreign requests.
- a8.47. **Criterion 40.14** When relevant for AML/CFT purposes, the FSA is in a position to exchange: (i) regulatory information; (ii) prudential information; and (iii) AML/CFT information. See also c.40.8.
- a8.48. **Criterion 40.15** In addition to conducting enquiries on behalf of foreign counterparts, the FSA may authorise foreign counterparts to conduct inquiries themselves in Norway in order to facilitate group supervision. The Nordic supervisory authorities have signed more detailed MOUs in relation to the supervision of particular financial groups.
- a8.49. **Criterion 40.16** Information received by the FSA from foreign supervisory authorities may only be passed on with the consent of the authority concerned and only for the purposes for which the consent was given: *FSA Regulations* s.3.
- a8.50. **Criterion 40.17** LEAs are permitted to internationally exchange information for both intelligence and investigative purposes as long as the information is not used in the context of a specific criminal case: *PA* s.24. This extends to domestically available information related to ML, predicate offences or TF, including the identification and tracing of the proceeds or instrumentalities of crime.
- a8.51. **Criterion 40.18** LEAs are able to use their domestic powers to conduct enquires and obtain information on behalf of a foreign counterpart based on multilateral or bilateral agreements in place. As indicated in relation to c.40.3 above, Norway extensively cooperates with foreign counterparts based on multilateral agreements in the context of Interpol, Europol, the Schengen agreement and the Prüm Convention. Such cooperation with foreign counterparts is coordinated by Norway's KRIPOS. Finally, in the context of the Nordic Police and Customs Cooperation, liaison officers of Denmark, Sweden and Norway are located around the world. The PST is able to use all of its powers, including coercive measures which also cover undercover operations, when multilateral or bilateral agreements are in place.
- a8.52. **Criterion 40.19** LEAs participate in cooperative investigations with foreign competent authorities, especially the Nordic countries. These cooperative investigations are conducted consistent with chapter 8 of the Agreement between the Nordic countries' law enforcement agencies on police cooperation. A similar arrangement exists within Europol and police authorities participate in that context. Norway reports that the PST has participated in joint investigations into TF offences.
- a8.53. **Criterion 40.20** Indirect exchange of information with foreign non-counterparts is permitted. The FIU often reaches out to foreign counterparts to support on-going investigations within ØKOKRIM. When doing so, it provides the necessary background information to allow its counterparts to make a clear distinction between co-operation sought for the FIU's intelligence purposes and information requested for purely investigative purposes. The information received from a foreign FIU will only be shared with domestic LEAs if the Norwegian FIU receives a formal consent from its counterpart.
- a8.54. **Weighting and conclusion:** Competent authorities are generally able to provide a wide range of direct and indirect international assistance, with only minor deficiencies. **Norway is rated LC with R.40**.





# **Table of Acronyms**

3AMLD EU 3rd Anti-Money Laundering Directive

AA Auditors Act

AC/AML Project Anti-corruption and Money Laundering project

Action Plan 2000 Norwegian Government's Action Plan for Combating Economic Crime 2000 Action Plan 2004 Norwegian Government's Action Plan for Combating Economic Crime 2004

AEAA Authorisation of External Accountants Act

Al-Qaida Regulations Regulation on sanctions against Al-Qaida of 22 December 1999

AML Anti-money laundering

AMLD EU Anti-Money Laundering Directive

ANSC Association of Norwegian Stockbrokers Companies

BERA Business Enterprise Registration Act
BNI Bearer Negotiable Instruments
BRC Bronnoysund Register Centre

C Compliant
CA Customs Act

CBA Commercial Banks Act

CCR Central Coordinating Register for Legal Entities
CCRA Central Coordinating Register for Legal Entities Act

CDD Customer due diligence
CFT Counter-terrorist financing
CJA Court of Justice Act

Circular 9/2004 FSA Circular 9/2004 of 15 April 2004

CLA Courts of Law Act

COE Corruption Convention Council of Europe Criminal Law Convention on Corruption

Control Committee Control Committee for Measures to Combat Money Laundering

Control Committee Regulations Regulation on the Control Committee for Measures to Combat Money

Laundering

CPA Criminal Procedure Act
CRA Currency Register Act

CRR Currency Register Regulations

Customs Directorate of Customs and Excise

DGPP Director General of Public Prosecutions

DNFBP Designated non-financial businesses and professions

DnR Norwegian Institute of Public Auditors

DOB Date of birth

DPA Data Protection Authority

DPP Director General of Public Prosecutions

EA Extradition Act

ECHR European Court of Human Rights

EEA European Economic Area

Egmont Principles for Information Egmont Principles for Information Exchange Between Financial Intelligence

Exchange Units for Money Laundering Cases

### TABLE OF ACRONYMS

EU European Union

EU Extradition Convention European Convention on Extradition

EUR Euros

FATF Financial Action Task Force
FCA Financial Contracts Act
FIA Financial Institutions Act
FIU Financial intelligence unit

FNH Norwegian Financial Services Association
FSA Financial Supervisory Authority (Kredittilsynet)

FS Act Financial Services Act

FSA Regulations Regulations concerning the exchange of information with supervisory

authorities from countries within and outside the EEA

FT Financing of terrorism / terrorist financing

HSH Federation of Norwegian Commercial and Service Enterprises

FUR Follow-up report
IA Insurance Act

ISA International Standards on Auditing and related services

IOPS International Pension Supervisors Group

IT Information technology

KRIPOS National Criminal Investigation Service

LEA Law Enforcement Agency
LLC Act Limited Liability Companies Act

LC Largely compliant

MFA Ministry of Foreign Affairs

MLA Money laundering
MLA Money Laundering Act

MLA Prep. Works Preparatory Works of the Money Laundering Act

MLR Money Laundering Regulations

MoF Ministry of Finance

MoJ Ministry of Justice and Public Security

MOU Memorandum/memoranda of understanding

MVTS Money or value transfer service (i.e. money remitter / alternative remittance

service)

N/A Non Applicable

NARF Norges Autoriserte Regnskapsføreres Forening (Association of Authorised

Accountants)

NAST National Authority for Prosecution of Organised and Other Serious Crime

NBA Norwegian Bar Association

NC Non-compliant

NCB Non-conviction based

NEA Nordic Extradition Act

NHO Confederation of Norwegian Business and Industry

NIPA Norwegian Institute of Public Auditors

NMFA Norwegian Mutual Fund Association

NOK Norwegian Kroner

NPD National Police Directorate
NRA National Risk Assessment

OECD Bribery Convention OECD Convention on Combating Bribery of Foreign Public Officials in

International Business Transactions

ØKOKRIM National Authority for Investigation and Prosecution of Economic and

**Environmental Crime** 

PA Police Act

PAA Public Administration Act

Palermo Convention United Nations Convention against Transnational Organised Crime (2000)

PC Partially compliant
PC Penal Code

PCCC Police Computer Crime Centre
PEP Politically exposed person

PLLC Act Public Limited Liability Companies Act

PF Proliferation financing

POB Place of birth

Police Academy
Police Directorate
National Police Academy
National Police Directorate

Population Register Norwegian Population and Employer Register

Prosecution Authority Government body responsible for conducting criminal prosecutions (headed

by the Director General of Public Prosecutions)

PSP Payment services provider

PST Norwegian Police Security Service
PSD EU Payment Services Directive

RBA Risk-based approach

RCA Regulations to the Customs Act

REAA Real Estate Agency Act
REBA Real Estate Business Act

Reg.1102 Regulation no.1102 of 30 November 1998 concerning exchange of

information with supervisory authorities from countries within and outside the

EEA

Regulations on International

Cooperation

Regulations relating to International Cooperation in Criminal Matters

Reporting DNFBP or All non-financial businesses or professions that are obligated to comply with

Reporting Designated Non-Financial

Businesses and Professions

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the Money Laundering Act and Regulations

Reporting entity All entities that are obligated to comply with the Money Laundering Act and

Regulations

Reporting FI or All financial institutions that are obligated to comply with the Money

Reporting Financial Institution Laundering Act and Regulations

RFA Regulations for Advocates

ROK Advisory Council for Combating Organised Crime

SBA Savings Banks Act
SFA Securities Funds Act

### TABLE OF ACRONYMS

S/RES/ United Nations Security Council Resolution

SRB Self-regulating body
SSB Statistics Norway
STA Securities Trading Act

STR Suspicious transaction report

Strasbourg Convention Council of Europe Convention on Laundering, Search, Seizure and

Confiscation of the Proceeds from Crime 1990

Supervisory Council Supervisory Council for Legal Practice

Taliban Regulations Regulation on sanctions against Taliban of 8 November 2013

Tax Bulletin Tax Directorate Bulletin of 5 November 2003

Tax Directorate Directorate of Taxes

TCSP Trust and company service provider

Terrorist Financing Convention United Nations Convention for the Suppression of the Financing of Terrorism

(1999)

UN United Nations

UNCAC United Nations Convention Against Corruption
UNCTC United Nations Counter Terrorism Committee

UNSC United Nations Security Council

USD United States Dollars

Vienna Convention United Nations Convention against Illicit Traffic in Narcotic Drugs and

Psychotropic Substances 1988