



Federation of European Accountants  
Fédération des Experts comptables Européens

FEE is committed to the fight against money-laundering and terrorist-financing, which is a shared responsibility for society as a whole. Last year we published various recommendations on the proposal for a fourth AML directive and co-hosted a constructive and thought-provoking breakfast briefing with Transparency International.

We at FEE see four key principles for effective AML regulation:

### Create the right environment

Good corporate governance is of the utmost importance, as this helps to ensure sound decision-making and risk-management. As money-laundering and terrorist-financing thrive on a lack of transparency, high-quality financial reporting is also essential. Furthermore, independent audits enhance the reliability of financial information and thus act as a deterrent.

### Take a comprehensive risk-based approach

A risk-based approach is crucial: it allows resources to be allocated more efficiently and encourages obliged entities to think more critically instead of simply engaging in tick-box compliance exercises. It should be adopted at all levels: by reporters, supervisors and legislators.

### Make things simple

Access to information is required in order to carry out effective customer due diligence and to identify beneficial owners and politically exposed persons. Costs and administrative burdens should be kept to a minimum.

### Keep people safe

Those who report instances of money-laundering protect the public interest and therefore deserve protection themselves. Their safety must be absolutely paramount.



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For more information on FEE's work, please visit [www.fee.be](http://www.fee.be).

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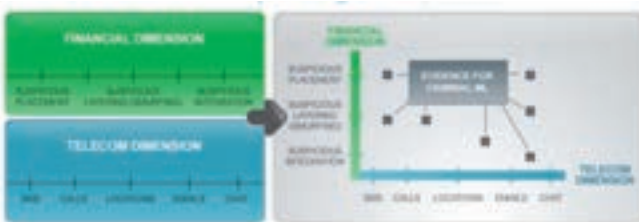
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# HEMOLIA

Hybrid Enhanced Money Laundering Investigation, Intelligence, Incrimination and Alerts

**HEMOLIA** is a new generation of Investigation and Intelligence System for Anti-Money-Laundering (AML) and Counter-Terrorism-Financing (CTF), which in addition to the traditional Financial Plane Sources, makes extensive use of modern society Telecom Plane sources, thereby opening up a new dimension of capabilities to Money Laundering Fighters (FIUs, LEAs). Adding the Telecom Plane to the existing Financial Plane may improve and change dramatically AML doctrines, since another dimension is added to the analysis and investigation processes.



### HEMOLIA Scope: Two—Dimensional investigation of AML

Significant Money Laundering (ML) activities are usually done across the globe, therefore ML fighters have to collaborate and share information for better intelligence, investigation and incrimination. Being a WEB based system in its nature, HEMOLIA enables secure networking (IPSEC) and global information sharing between FIUs/LEAs in Europe and around the globe in a way that enables each donor FIU/LEA to be a 'master' that have full control about the data parameters to share with any recipient country. The shared data formation is usually determined based on bilateral agreements between countries.

HEMOLIA info sharing mechanism and network is called '**P3A**', which stands for **Privacy Preserving Push Alerts (and Reports)**, meaning that HEMOLIA enables FIUs/LEAs to protect the suspect privacy because of the above two reasons (using IPSEC and a donor which is master). P3A can be implemented in any FIU who has HEMOLIA system in its premises

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