Money laundering (ML) can be defined as the process whereby criminals introduce the proceeds of their criminal activities into the world's financial system in an attempt to disguise the true source of the funds. These funds may be proceeds from drug trafficking or other serious crimes. The laundering of tainted funds in this manner allows the criminals to use their "dirty money" without fear of detection or prosecution. Closely linked to money laundering is terrorism financing (TF). In terrorism financing, funds may originate from legitimate or criminal sources. However, the techniques used to conceal the sources and uses of the terrorists' funds are similar to ML. Singapore is keenly aware of the significant harm that ML and TF can bring. As a major financial centre in this region, Singapore has put in place measures to ensure that we are not a safe haven for money launderers and terrorism financiers. The measures include robust AML/CFT legislation, close partnership with the business community, strict enforcement action and ongoing supervision and active international cooperation. These measures form Singapore's AML/CFT framework where everyone plays an important role in combating ML and TF and help build and maintain Singapore's strong reputation as a well-regulated major financial centre. The Financial Investigation Division of CAD is the specialist AML/CFT division in CAD. It enforces the AML/CFT regime through the detection of ML/TF activities, investigation and prosecution of ML/TF offences and in the seizure and confiscation of illegal proceeds. Singapore's AML/CFT policy objectives are to detect, deter and prevent money laundering, associated predicate offences and terrorism financing; and protect the integrity of its financial system from illegal activities and illicit fund flows. To adequately focus on money laundering investigations in Singapore, regardless whether the money laundering offence arose from a domestic or foreign predicate offence. To deprive criminals of the proceeds and instrumentalities of their crimes (both domestic and foreign), or of property of an equivalent value. The first strategy is to ensure that money laundering is pursued in all appropriate cases, including those arising from foreign predicate offences. This includes Case Proforma to be completed by the investigator and counterchecked by both his supervisor and the Attorney-General's Chambers, audits to be conducted by CAD for compliance within the Singapore Police Force, formalise and update Standard Operating Procedures with other law enforcement agencies and competent authorities, for money laundering cases to be referred to CAD, review all incoming formal or informal foreign request for assistance for possible money laundering offences committed in Singapore and right-sizing of resources for investigations. The second strategy is to promote effective international cooperation, proactively engage foreign counterparts, especially counterparts from higher risk jurisdictions, whenever suspected ML is detected in Singapore arising from foreign predicate offences, conduct parallel/joint investigations with foreign counterparts, on the basis of confidentiality and reciprocity, where appropriate and share information with foreign counterpart in the context of a parallel/joint investigation. The third strategy is asset Confiscation as a Desired Outcome which includes conduct parallel financial investigations for cases with criminal proceeds generated, seize criminal proceeds at the earliest opportunity to prevent dissipation, streamline workflows to ensure fast response in cases where suspected tainted assets are still in Singapore and strengthen strategic partnerships especially with financial institutions on asset seizures. The fourth strategy is to address ML risks identified in NRA including proactively engage the regulators for the higher risk sectors, update AML/CFT Steering Committee and relevant agencies whenever new ML trends/threats are detected and proportionality principle in mitigating risks for Medium or Low

Risk areas. The fifth strategy is to strengthen collaboration with STRO which include work with STRO to develop "red flag indicators" to the reporting entities to assist them to detect suspicious transactions, work with STRO's liaison officers to fine-tune referral criteria and to support STRO in outreach efforts; to provide the public with case studies on STRs that led to the detection of ML and investigation outcomes. The sixth strategy is attention to emerging trends/Reduce "unknown unknowns" which include to acknowledge that risks are dynamic, may change from time to time, and that even with best efforts we cannot know everything there is to know about the ML risk in Singapore, continue sending quality spontaneous exchanges of information to detect crime, especially ML in Singapore, proactively engage foreign counterparts for their perception of ML risks in Singapore vis-à-vis their respective home countries. To discuss and seriously consider these risks even if the risk in the latest NRA is assessed as low. To explore ways to detect ML cases in situations where there are few ML cases in a particular area/crime category and to scan international/media reports to find out others' perception of risks and pursue the cases, if sufficient details are provided.