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Studying the Prevention and Combating of Money Laundering Considering the Approach of International Financial Institutions

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ABSTRACT

In recent decades, we have witnessed numerous advances in the fields of industry and technology, the use of which has been able to affect financial markets. On the other hand, some criminal organizations are trying to create chaos in the stock market and weaken financial structures by conducting false transactions. It is obvious that the spread of these activities has caused instability in the global economy and can reduce the effectiveness of international laws and regulations and foreign investments.

Given the increasing complexity of financial crimes and the need to combat international crimes and terrorism, the question arises as to what impact the phenomenon of money laundering has had on the global economy and what is the approach of international financial institutions in preventing and combating this process? Based on the findings of this study, which was conducted using a descriptive-analytical method, money laundering is one of the fundamental problems in the field of international economics.

The supervision of international institutions over financial systems should be carried out with the aim of protecting the integrity and stability of international financial systems, and this requires that international financial institutions, through interaction with each other and cooperation with various countries, improve their measures in the field of combating money laundering, including tracking the flow of dirty money, increasing the transparency of international banking systems, further developing electronic infrastructure, integrating financial information systems, etc., and raise them at the global level.

KEY WORDS: International economy, money laundering, international community, combating money laundering, international institutions

Introduction

Human achievements in the 20th century have led to major developments in the global economy and in banking and financial systems, and at the same time, and inevitably, they have led to the development of traditional crimes on a global scale and with new methods and methods, including the phenomenon of money

laundering.

The phenomenon of money laundering, taking advantage of developments in the field of financial affairs and the phenomenon of globalization in recent decades, has expanded unprecedentedly and has faced serious challenges for the economies of all countries and the global economy. Money laundering means making illegal funds

and income appear legal.

The International Monetary Fund has defined this crime on its official website as a process in which the illegal source of assets obtained or generated by criminal activities is concealed in order to hide the connection between the funds and the main criminal activity.

A similar explanation has been given by an intergovernmental body known as the Financial Action Task Force, which states that when a criminal activity generates significant profits, the individual or group involved in the criminal act must find a way to control the funds without attracting attention. The underlying activity or individuals involved and the criminals do this by hiding the sources, transforming or moving the funds to a place where they are less likely to attract attention.

Money laundering can include any financial transaction that results from an illegal act. The illegal activity of laundering money through a complex network of shell companies is now recognized as a potential risk. Given the diversity of illegal activities and the vast volume of money generated by them, a large volume of capital in circulation is accounted for by dirty money.

“Given the destructive and harmful economic, social and political effects of money laundering, today the need to prevent the conversion, transfer, acceptance or possession of assets of illegal origin is fully felt” (Ranjbar & Nejad Mousavi, 2022; 7). In the present study, we seek to answer these questions: what impact has the phenomenon of money laundering had on the global economy and what is the approach of international financial institutions in preventing and combating this process? Today, money laundering has grown significantly and is considered a threat to international financial systems. For this reason, the determination of international financial institutions is focused on combating it and has implemented various programs to achieve this.

1. Background

In a study entitled “The International Anti-Money Laundering Regime: The Role of the Financial Action Task Force” (Alexander, 2001: 248- 231). It is stated that the Financial Action Task Force has initiatives to combat money laundering and, with the approach it adopts, prevents financial crimes. In another study entitled “The Participation of the International Monetary Fund in Combating Money Laundering” (Holder E, 2003: 383-387).

It is stated that the International Monetary Fund has the authority and tools to combat money laundering. It also examines the interactions of the International Monetary Fund with the Financial Action Task Force in combating money laundering. In a study entitled “The Effectiveness of Judicial Cooperation in Combating Money Laundering” (Gaudin & Vernier, 2008:20), it has been stated what effects the cooperation of international institutions has in combating money laundering.

It has also been stated that international institutions should apply stricter laws. The difference between the aforementioned studies and this article is that these studies have not paid careful and direct attention to the category of the role of international financial institutions in combating the phenomenon of money laundering. The authors of this study intend to examine in particular the approach of international financial institutions in preventing and combating the phenomenon of money laundering.

2. Conceptual Framework and Theoretical Foundations

2.1 The Concept of Money Laundering

It is a process of concealing the criminal origin of funds obtained

from various crimes such as drug trafficking, arms trafficking, prostitution, etc. with the aim of creating the belief that the illegally obtained capital has a legal source and then introducing this capital into the legal economy; in other words, money laundering is generally defined as the introduction of The proceeds of illegal activities are defined as the proceeds of crime in legal economic circuits.

Criminals have always tried to hide the origin of assets obtained from crimes in order to erase all traces of their wrongdoing. These days, money laundering methods have become more sophisticated and the logic of laundering is no longer to transform banknotes into gold bars, but to create a legal window for illegal operations and activities.

According to the Financial Action Task Force on Money Laundering, an international organization specialized in combating money laundering, “money laundering involves the reprocessing of proceeds of criminal origin in order to hide their illegal origin. This process is of vital importance because it allows the criminal to benefit from these benefits.” The Council of Europe has defined money laundering based on its purpose, which can be summarized as: “the transformation of illicit funds into legal money, which can be reinvested in legal sectors or used for personal purposes.”

“Technically, money laundering consists of the concealment of assets of illegal origin by means of the misuse of financial market instruments and circuits, in order to minimize the risk Discovering the link between the crimes committed and the profits made, in simple terms, money laundering is the method of legalizing dirty money” (Vernier, 2017: 59).

2.2 The money laundering process

In theory, any money laundering process pursues three consecutive goals: the first activities are aimed at concealing the ownership as well as the illegal origin of the dirty funds. Then, the form of money must be changed, that is, the huge and cumbersome volume of cash must be converted into non-cash money, and the last step is to break the chain between the original crime that constitutes the source of the funds and the proceeds.

The aim of these activities is to erase the traces that lead back to the origin of the income. “The money laundering process has several models, the best known of which is the classic model developed by the United States Customs authorities. In this model, the laundering operation consists of three parts, each part of which must be carried out carefully and completely, and then you can move on to the next step.

These three parts are “placement, accumulation and integration” and of course the riskiest stage is the final point, the stage of integration and investment of money in the legal economy. In the first stage (placement), money launderers seek to introduce the cash proceeds of crimes into the financial system, in order to convert them into “credit” within the banking system. This process is carried out over a relatively long period of time by depositing funds into bank accounts.

In the second stage, the operation is carried out by carrying out several consecutive transactions that are often carried out in the financial and banking system. Given the large number of actions carried out, combined with the complex and ingenious techniques, this stage makes it difficult for legal authorities to reconstruct the chain of transactions to reach the criminal origin.

In this stage, launderers, for example, convert cash that has already been placed in the bank into payment instruments such as checks. In

the last stage of the money laundering process, the aim is to return funds of illegal origin to the legal monetary and financial network in order to invest them in various economically profitable projects.

In this stage, money launderers usually pursue two objectives: on the one hand, they seek to maximize the return "Their investment is like any other rational investor. On the other hand, they try to sell the products obtained from the previous two stages at any price" (Sateai, 2022: 8).

2.3 Effects of Money Laundering on the Economy

Combating money laundering is a phenomenon that should be given special attention by the international community and policymakers and statesmen of all countries in the world in order to bring them economic security and stability.

According to the International Monetary Fund, combating money laundering is a necessary and essential thing to create stable conditions and economic transparency. The more the economy moves away from competitive conditions, the more prepared and widespread the ground for money laundering activities will be.

The most important risk of money laundering is the threat to the economy at the national and international levels. According to statistics from the International Monetary Fund, money laundering is about 2 to 5 percent of the gross domestic product of countries. This percentage shows that the amount of money laundering is between 590 billion and 5.1 trillion dollars, meaning that the lowest amount of money laundering is a figure equivalent to the total economic output of a country like Spain. "In underdeveloped countries, money laundering causes capital to flee illegally.

In these countries, criminals convert money into currency through banks and exchange offices and transfer it to advanced countries" (Ardebili, 2003:184). Money laundering has many negative effects and consequences in various economic and social areas (Jantani, 2017: 62). In general, the effects of money laundering on the macroeconomics of countries include the following:

- 1) Creating unequal competition in the markets.
- 2) Disruption in the monetary system.
- 3) Disruption in the foreign exchange market.
- 4) Disruption in the tax system.
- 5) Creating incorrect economic information and statistics.
- 6) Disruption in the market mechanism.
- 7) Disruption in the banking system.
- 8) Adverse impact on society's savings.
- 9) Disruption in international trade.
- 10) Contamination and instability of the economy.
- 11) Weakening of the private sector and privatization programs.

2.4 Money laundering in the world

According to statistics published by the United Nations, the rate of money laundering in the world It is estimated that around 500 to 1000 billion dollars are laundered annually. More than 50 percent of these operations belong to the Swiss banking system. The mechanism of money laundering is different in the world. The simplest method is to create nested bank accounts.

In this method, money is passed through several routes so that its origin is lost through multiple channels in different banks and cannot be traced. The use of the banking system and stock exchange should be considered one of the most common methods of money laundering. Banks are the channel through which most dirty money enters the legal financial system. The International Monetary Fund

estimates that 2 to 5 percent of world production is laundered every year.

Conviction of a country, especially its banks and financial institutions, for not complying with internationally accepted standards in combating money laundering entails serious consequences in terms of reputational risk, etc. This causes financial centers The country has been accused and is classified internationally as an unsafe financial center. "Banks are required to report money laundering whenever there are reasonable grounds to suspect it.

However, this is not practical and is subject to individual opinions" (Walker, 1999: 7). Money laundering can occur both in the banking system and in the stock market. Financial resources may be converted into shares or deposit accounts through illegal and illegitimate means. If investors do not provide legal documentation when selling shares, the question arises as to where this income came from. Although cash is not used to buy and sell shares on the stock exchange and the said funds are provided to the stock exchange in the form of bank checks, etc., the origin of the money obtained must be clear so that it can be prevented from a judicial, security and law enforcement perspective in the event of a breach; the banking system and the stock exchange must have sufficient supervision and control over this matter.

Another way in which money laundering occurs in the stock exchange Using a legal representative to buy shares in a company breaks the link between the criminal and the money he has illegally obtained.

The representative's name is recorded in the company's books and documents as the holder of the shares. The representative is only an agent or trustee for the real owner, and the real owner of the shares may not even be known to the representative. "Stock and securities trading can also be a channel for money launderers to escape" (Durguti et al.,2023: 5).

Another method of money laundering is money laundering. This means that small bills obtained from the sale of drugs and contraband on the street are converted into large bills. Usually, many people are used to convert small bills into large bills. It is worth noting that the provision and conversion of these bills is often carried out by third parties. "It seems that measures are being taken to separate legal financial proceeds from dirty money can reduce the added value of this crime" (McCarthy et al. 2014: 4)

2.5 The Need to Combat Money Laundering

International efforts to combat money laundering reflect a strategy aimed at weakening the economic power of criminal organizations. This is achieved by preventing the consumption of proceeds from criminal activities and the adverse economic impact of criminal activities on the fabric of the legal and formal economy.

Anti-money laundering refers to a network of laws, regulations and procedures that aim to uncover attempts to conceal illicit funds from transactions. The fight against money laundering seeks to uncover the process of concealment in various dimensions, from tax evasion and drug, human and arms trafficking to public corruption and the financing of individuals and groups.

Anti-money laundering systems are implemented in some major international institutions to monitor potential activities suspected of money laundering. Anti-money laundering efforts seek to make it more difficult to conceal the proceeds of crime.

"In recent years, money laundering has caused and continues to

cause irreparable damage to national and international economies, so that many institutions have been established to combat it at the national and global levels" (Alldrige, 2008:6).

3. History of money laundering and its fight

Money laundering has a long history. The use of the term money laundering dates back to the 1930s. During this period, the Al Capone gang purchased and set up coin laundries to collect money from criminal activities. Money laundering took on wider dimensions after World War II and affected the national economy.

The first coherent and centralized anti-money laundering structures were established at the initiative of the Financial Action Task Force in 1989. Thus, a group of countries and international organizations formed the Financial Action Task Force to create integrated and effective cooperation in the global arena to combat organized money laundering.

In October 2001, with the escalation of terrorist attacks, especially the September 11 terrorist disaster, the main focus of the Financial Action Task Force's activities expanded to combat the financing of terrorism. The United States Anti-Money Laundering Act of 2020, which was passed in early 2021, was the most extensive reform of the world's anti-money laundering regulations since 2001.

The 2021 Act also included organizational transparency mechanisms that make it more difficult to use shell companies and layered transactions for sanctioned activities, tax evasion, and money laundering.

4. Approaches of international financial institutions in preventing and combating money laundering

4.1 International Monetary Fund

The IMF's strong presence on the global stage, high supervisory capacity, and expertise in the financial field have made this organization an integral member of the international arena in combating money laundering and terrorist financing. In March 2004, the IMF decided to include anti-money laundering compliance assessments and technical assistance in this area in its regular activities, in order to provide greater assistance to affected countries and regions. "In fact, this action was taken with the aim of assisting governments and providing large loans to combat money laundering and terrorist financing" (Biglaiser & Hunter, 2020: 3). "The IMF enters the international fight against money laundering and terrorist financing with a multilateral approach, because as a globally recognized cooperative organization, the Fund is a trusted and vital institution for sharing information, developing common approaches on important issues, and promoting desirable policies and standards in the field of combating money laundering and terrorist financing" (Bartulovic et al. 2023: 7). Currently, the three main areas of activity of the IMF in the field of combating money laundering and combating the financing of terrorism are:

- a) Assessments: According to the Fund's approach, any assessment related to the strengths and weaknesses of the financial mechanism of member countries must be refined in terms of compliance with the Financial Action Task Force on Money Laundering and the draft Convention on the Suppression of the Financing of Terrorism

Such assessments are measured and implemented in an integrated manner and in coordination with the recommendations of the Financial Action Task Force and the World Bank, based on an agreed and common approach for financial institutions, banks, and non-financial institutions.

- b) Technical assistance: The IMF, in collaboration with the World Bank, provides significant technical assistance to its member countries to strengthen their legal, regulatory, institutional, and financial frameworks for combating money laundering and terrorist financing.
- c) Practical policy proposals: IMF and World Bank researchers and planners have been active in the field of policy advice and research assistance by providing fundamental analyses and proposing international policies in the design, implementation, and implementation of laws and approaches to combating money laundering and terrorist financing.

"The institution's participation in determining financial policies has been able to facilitate the creation of a productive economy and the provision of public goods in many countries" (Holder, 2003: 6).

4.2 European Bank for Reconstruction and Development

The Bank was established in 1991 in response to the unprecedented challenges and changes brought about by the transition of the countries of Eastern Europe and Central Asia from centrally planned economies to market-led economies, and committed to supporting this transformation.

The Bank, as a major investor and lender in debt and equity transactions of businesses and financial institutions resident in the countries of its operations, has improved and continuously improved anti-money laundering and countering the financing of terrorism measures.

"The Bank was also determined to ensure that all its operations had a transformative effect, contributing to the transformation of these countries' economies from planned to free market economies, and contributed to this process by insisting on anti-money laundering and countering the financing of terrorism standards" (Florea et al. 2022:5).

As in the past, the Bank emphasizes the importance of appropriate anti-money laundering and counter-terrorism measures in its restructuring and improvement projects and in its other investments with governments in which it operates. It cooperates with the World Bank, the International Monetary Fund and other international financial institutions through its role as a principal investor and lender. It will cooperate with pioneers in the development of anti-money laundering and counter-terrorism financing standards, including the Financial Action Task Force.

"Some economic experts believe that the establishment of the European Bank for Reconstruction and Development was aimed at promoting entrepreneurship in European societies and developing economic enterprises in order to reduce the long-term damage caused by the post-Cold War era" (Linarelli, 1995:7).

4.3 Financial Action Task Force

The Financial Action Task Force regularly reviews money laundering and terrorist financing practices and trends to ensure the continued relevance of its policies and standards. "Money laundering for business purposes has attracted the attention of anti-money laundering agencies, especially the FATF, due to its hidden aspects and unknown methods of commission" (Jamali, Mirzaei & Abdulahi & Hajjani, 2023: 257). Thus, the first task of the FATF was to establish international standards for combating money laundering. The FATF issued its first set of international anti-money laundering standards in 1990 with forty recommendations on money laundering. These recommendations were revised in 1996 to take into account changes in money laundering methods. "The

continuous evolution of money laundering methods prompted the FATF to take action by updating the FATF standards in June 2003” (Yeh, 2022: 5). The FATF must ensure global action to combat money laundering and the financing of terrorism and the strict implementation of its forty recommendations worldwide.

So the Financial Action Task Force started this action with its own members. “The FATF has developed a strong partnership with these organizations to form a global network of organizations against money laundering and terrorist financing” (Zaqibh-Al, 2013: 45).

The FATF calls on all countries to take the necessary steps to align their national systems for combating money laundering and terrorist financing with the new FATF recommendations and to implement them effectively.

In its Forty Recommendations for Combating Money Laundering, the FATF specifically incorporates the technical and legal definitions of money laundering as set out in the Vienna and Palermo Conventions and lists 20 categories of offences that should be included as predicate offences for money laundering. “A key element in combating money laundering is the need to monitor and evaluate countries’ systems in line with international standards” (Felix, 2019: 44).

4.4 International Association of Insurance Supervisors

The International Association of Insurance Supervisors, established in 1994 The International Association of Insurance Supervisors (IAIS) is a supervisory organization consisting of over 100 countries and jurisdictions.

“Its primary objectives are:

1. To promote cooperation among insurance regulators.
2. To set international standards for insurance supervision.
3. To educate members.
4. To work collaboratively with regulators in other financial sectors and international financial institutions” (Suppiah & Ujoodha, 2023). The IAIS covers a variety of topics, including all areas of insurance supervision, and has addressed the issue of money laundering in one of its publications.

In January 2002, the IAIS published Publication No. 5, Guidelines for the Supervision of Insurance Companies. This publication comprehensively addresses the issue of money laundering in the insurance industry. Like other international publications, the anti-money laundering guidelines are intended for implementation in countries and are specific to specific insurance companies, the services provided in a country, the financial system, The economy, and its legal and organizational structure are discussed. The publication has four principles for insurance companies:

1. Comply with anti-money laundering laws.
2. Have customer identification programs.
3. Cooperate with all law enforcement agencies.
4. Have anti-money laundering policies and procedures and training programs for employees.

These four principles are parallel to the four principles stated in the Ball Committee statement. “The publication is fully consistent with the forty recommendations, including suspicious transaction reporting and other requirements” (Kawai, 2005, 8).

4.5 International Organization of Securities Commissions

The International Organization of Securities Commissions is responsible for the regulation and administration of securities laws

in their respective countries.

There are currently 105 member countries in this organization. If a government authority is not responsible for administering securities laws in a country, a self-governing body, such as a stock exchange organization, from that country can have voting rights. International organizations and affiliates also participate in this organization, but do not have voting privileges. “The International Organization of Securities Commissions has three main objectives:

1. To protect investors.
2. To ensure the existence of sound, efficient and transparent markets.
3. To reduce risk. (Gerbrands, et al. 2022: 6) “SystematicIn 1992, the International Organization of Securities Commissions adopted a resolution on money laundering.

Like other international organizations, the International Organization of Securities Commissions does not have legislative authority. Like the Ball Committee and the International Association of Insurance Supervisors, it relies on its members to implement its recommendations in their respective countries. “In fact, it seeks to create a platform for cooperation among international organizations by promoting new standards in the regulation and supervision of financial institutions” (Alexander, 2010:5).

4.6 OECD

The organization has given priority to combating economic crimes, including corruption and tax fraud. The principles of corporate governance and the work done in the area of proprietary interests are of interest to the Financial Action Task Force on Money Laundering. The organization closely monitors international money laundering and international bribery.

The Organization’s Convention on Combating Bribery of High-Level Public Officials in International Business Transactions requires signatory countries to take measures to launder money obtained from bribery of high-level public officials.

The Convention establishes a parallel review system to ensure that signatory countries are effectively implementing the organization’s anti-bribery instruments. Part of this process includes reviewing the effectiveness of anti-money laundering systems and their application to international bribery.

“Since 1998, the Organization’s Finance Committee has been working with the Financial Action Task Force on Money Laundering to promote international and regional cooperation between tax and anti-money laundering authorities as a way of enhancing the ability of governments to combat these activities” (Woodward, 2004: 9).

4.7 The Egmont Group

The Egmont Group is an international alliance of 164 financial intelligence units from around the world that was formed in 1995 at Egmont Palace in Brussels to enhance coordination between units responsible for combating money laundering and countering the financing of terrorism.

The goal of the Egmont Group is for the FIUs of member countries to act in a coordinated and effective manner in the fight against money laundering and countering the financing of terrorism. “The Group strives to strike a balance between the sensitive nature of financial information disclosure and the protection of the confidentiality of such disclosure, and cases, after careful review and analysis in the FIUs of the countries, are handed over to the competent authorities for investigation, prosecution or trial on a

case-by-case basis” (6 2022: Aksenova).

Strengthening international cooperation between FIUs of countries is one of the important goals of the Egmont Group, which, in addition to the website and training, is carried out through the annual meetings of the group.

At these meetings, newly established FIUs are provided with the necessary training and on the development of cooperation with other units and organizations. The Group helps FIUs to develop models for cooperation and exchange of information and to adopt memoranda of understanding for effective communication with each other.

The Egmont Group aims to convince FIUs of the many areas for cooperation between them and the need for such cooperation to be effective and sustainable and to be strengthened in order to combat the financing of terrorism and money laundering at the national and international levels. “Accordingly, in the preamble to the Egmont Group Charter and its resolutions, the members of the Group emphasize the following principles:

1. To unite their efforts to further improve the effective exchange of information, upon request and on a voluntary basis, in order to combat money laundering and the financing of terrorism.
2. To effectively exchange information on their respective experiences in order to enhance the performance of FIUs of countries.
3. To support the capacity of FIUs of countries by providing training and technical assistance, improving the exchange of skilled manpower, developing operational and strategic cooperation and providing access to a secure channel for the exchange of information between member units.
4. To cooperate legally in all areas relevant to this Charter” (Adetunji, 2019:10).

In general, in response to environmental developments, the Egmont Group seeks to strengthen the effective exchange of information between countries' financial intelligence units in order to combat terrorist financing and money laundering.

4.8 Basel Committee on Banking Supervision

The highest international body involved in banking supervision is the Basel Committee. This committee is composed of senior representatives of the central banks of a number of major industrialized countries in the world, including: Germany, the United Kingdom, Italy, France, the United States, Switzerland, Sweden, Japan, Canada and Luxembourg, which is usually convened every three months by the Bank for International Settlements as its permanent secretariat in Basel, Switzerland.

Because the aforementioned meetings are held in Basel, this committee is known as the Basel Committee. The Basel Committee does not have legal power, but most member countries are implicitly obliged to implement its recommendations. The main task of the Basel Committee is to provide advice to the banking system in relation to money laundering:

1. Issuing statements on money laundering in banks.
2. Developing principles for banking free from money laundering and terrorist financing.
3. Developing a framework for investigating bank customers suspected of money laundering and terrorist financing (Singh, 2005:300).

The Swiss Basel Committee, in addition to its global responsibilities in relation to banking policy, is also responsible for combating money laundering. It develops, implements and monitors policies to strengthen banks against money laundering risks. “It should be noted that membership of the Basel Committee is limited to the G10 member countries plus Luxembourg, Belgium and Switzerland” (Rost, 2010:9).

“It should also be noted that another body is active in relation to bank resilience, called the Wolfsburg Group, whose scope of activities is in the field of private banks” (Aiolfi & Pieth, 2003:10)

4.9 Wolfsburg Banking Group

The Wolfsburg Group is a non-governmental association of 13 international banks. The aim of this association is to develop financial industry standards in the field of policies to combat money laundering, customer identification and combating the financing of terrorism. The activities of this association can be compared to the activities of the Financial Action Task Force on money laundering at the international level.

The Wolfsburg Group believes that the FATF's recommendations on combating money laundering are “overly descriptive and at the same time too poorly understood.” “A variety of documents, including principles, guidelines, and frequently asked questions, are developed and published by the Wolfsburg Group. These documents include:

“Statements on the Financing of Terrorism,” “Anti-Money Laundering Principles for Correspondent Banks,” “Guidance on a Risk-Based Approach to Managing Money Laundering Risks,” “Frequently Asked Questions on Politically Exposed Persons,” “Principles of Business Finance,” “Guidance on Anti-Bribery and Corruption Compliance Programs,” and a statement emphasizing standards for increasing the transparency of international transactions to enhance the effectiveness of international programs to combat money laundering and the financing of terrorism” (Haynes, 2004: 5).

The Wolfsburg Questionnaire is one of the tools developed by the Wolfsburg Group to exchange information necessary for compliance with laws and regulations and the fight against money laundering and terrorist financing. The usable content of this questionnaire and the importance of exchanging this information are so important to banks that, without there being any obligation to use this questionnaire, most banks (including large and small banks) have included its use in their agenda.

“The importance of this questionnaire is such that SWIFT has also signed an agreement with the Wolfsberg Group. The aforementioned questionnaire has recently been revised and the previous questions have been asked in more detail and in a more complete manner. So that the number of headings has increased from 10 to 13 headings and the number of questions in total from 140 to more than 300 questions. This indicates the increasing importance of the degree to which banks comply with laws and regulations when applying for brokerage relationships” (Dinkel, et al.1991: 3).

“Since the cost of implementing standards to resume relations with international banks, through contracting with companies providing consulting services and related solutions in this area, is very high, banks can use this questionnaire as a checklist of the necessary standards to reach the desired level.

An action that can reduce the costs related to identifying the gap between the current situation and the desired situation, by identifying in which areas what actions should be taken to eliminate

this gap in the shortest possible time, and will greatly help banks in reaching the desired level of global standards" (Canales & Rocha,2022: 10).

Conclusion.

The acquisition and laundering of dirty money is an illegal and illegal act and has negative consequences on the economy of countries and even the global economy. Therefore, money laundering is one of the fundamental problems in the international economy. For more than decades, the international community has prioritized the fight against money laundering.

International financial institutions such as the International Monetary Fund, the Financial Action Task Force, the Egmont Group, the Wolfsburg Group, the Ball Committee and other institutions have provided a single definition of money laundering and have developed standard strategies (such as customer identification and verification, refraining from conducting suspicious transactions and operations and reporting them to legal authorities, cooperation with law enforcement agencies, etc.) to combat money laundering.

Among the goals of international financial institutions in combating the crime of money laundering are protecting the integrity and stability of international financial systems, cutting off resources available to terrorists, and making it difficult for actors in the field of terrorism and criminal activities to profit. Although international financial institutions have provided numerous strategies and initiatives in the field of combating money laundering, more measures are still needed.

Therefore, it is essential that such institutions, through interaction with each other and cooperation with various countries (through signing bilateral and multilateral agreements), strengthen their measures in the field of combating money laundering, including tracing the flow of dirty money, increasing the transparency of international banking systems, further developing electronic infrastructure, integrating financial information systems, etc., and promote them at the global level.

International anti-money laundering institutions can also play an important role in identifying and confiscating illegal income by updating international financial documents and laws. International institutions' supervision of financial systems should be carried out with the aim of identifying and prosecuting international criminals, and this requires creating appropriate platforms for cooperation between governments in the field of extradition of criminals.

Countering the phenomenon of money laundering requires a special and informed view at the global level, so international institutions should develop specific legal training that includes awareness of all laws and regulations on combating money laundering.

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