



Annual Report 2024



**FIGHTING FINANCIAL CRIME AND STRENGTHENING FINANCIAL SECTOR INTEGRITY BY WORKING TOGETHER
AS A SINGLE, RESULTS-ORIENTED PUBLIC AUTHORITY.**

Foreword



The FEC: 25 years of fighting financial crime

In 2024, the Financial Expertise Centre (FEC) celebrated its silver jubilee. A quarter of a century of cooperation between authorities that have supervisory, monitoring, prosecution or investigative tasks in the Netherlands' financial sector. A quarter of a century of working together to strengthen the sector's integrity.

The immediate reason for the FEC's creation was Operation Click Fund. On 24 October 1997, the police, together with the Fiscal Intelligence and Investigation Service (FIOD) and the Economic Surveillance Department (ECD), raided the stock exchange, as well as several banks and stockbrokers. Several high-profile figures from the world of finance were arrested, and some of them were in detention for weeks.

The operation ended with a whimper – most of those accused were acquitted or given light probation sentences. But it was a wake-up call: regulatory and investigative authorities did not seem to be cooperating enough. Given the great societal importance of an ethical financial sector and the importance of sound supervision of administrative and criminal law enforcement in the financial sector, it was decided to establish a Financial Expertise Centre.

Twenty-five years on, the FEC has broken away from the Ministry of Finance and evolved into a professional partnership. Earlier in 2025, it was formalised in Dutch legislation on data processing by partnerships. Moreover, our partnership has long since ceased to be limited to public-sector partners: collaboration with private-sector partners has become an inseparable part of the FEC.

Given the importance of the financial sector to the Dutch economy, moreover, the FEC's raison d'être can hardly be questioned. Indeed, the FEC is flourishing. For instance, in 2024, the Financial Supervision Office (BFT) joined the FEC as a partner and the National Police Internal Investigations Department joined the FEC's Serious Crime Task Force (SCTF) as a participant.

Considering what we achieved in 2024 in terms of our three core tasks, I am honoured to lead our unique partnership as its Chair. The FEC: twenty-five years young, a quarter of a century of cooperation, a quarter of a century of successes and challenges.

We rightly celebrated our silver jubilee in style, but past achievements should not be a reason to become complacent. Reflecting on the past with satisfaction, we approach the future with renewed optimism, knowing that our joint efforts can achieve more than we can alone.

Laura van Geest, FEC Chair

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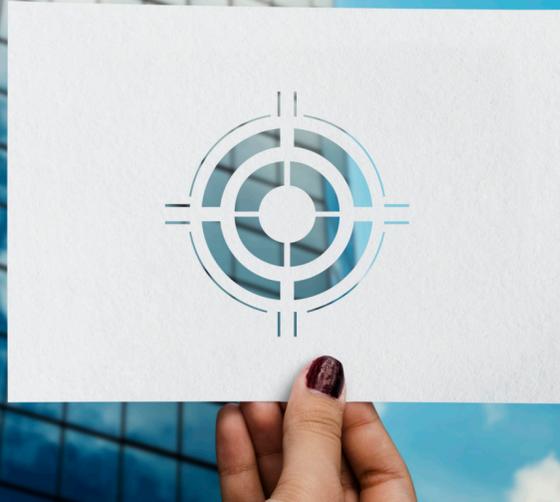


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Mission, objective and tasks



Mission, objective and tasks

The Financial Expertise Centre (FEC) is a partnership of various authorities with supervisory, monitoring, prosecution or investigative tasks in the Netherlands' financial sector, which has been established to strengthen sector integrity.

Its partners and observers do so by sharing their insights, knowledge and skills, including through education and internal and external communications. The FEC's enhanced information position and collective approach allows for more incisive problem-oriented action with a broad impact. This enables it to more effectively prevent and combat financial crime and unethical behaviour.

Our Key tasks:



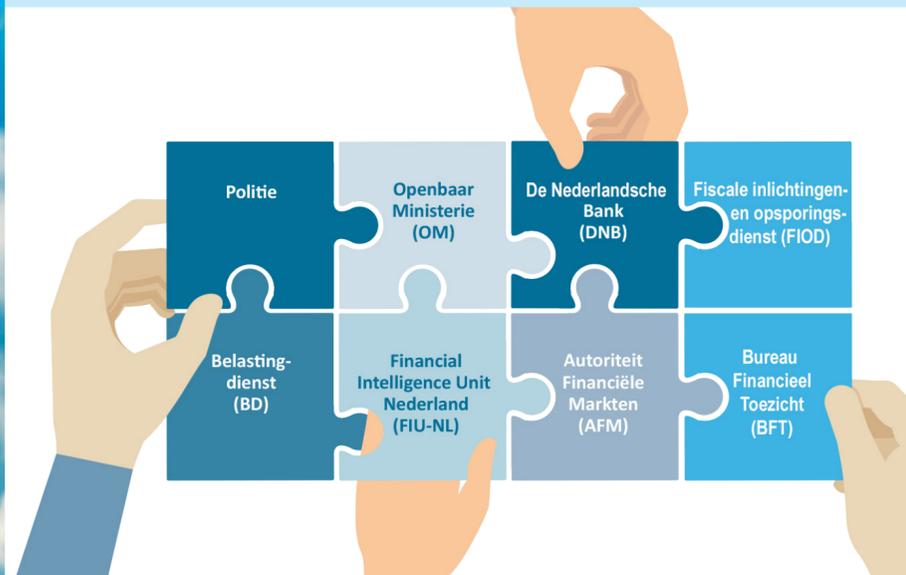
Exchanging information



Share knowledge



Collaborate in projects and task forces

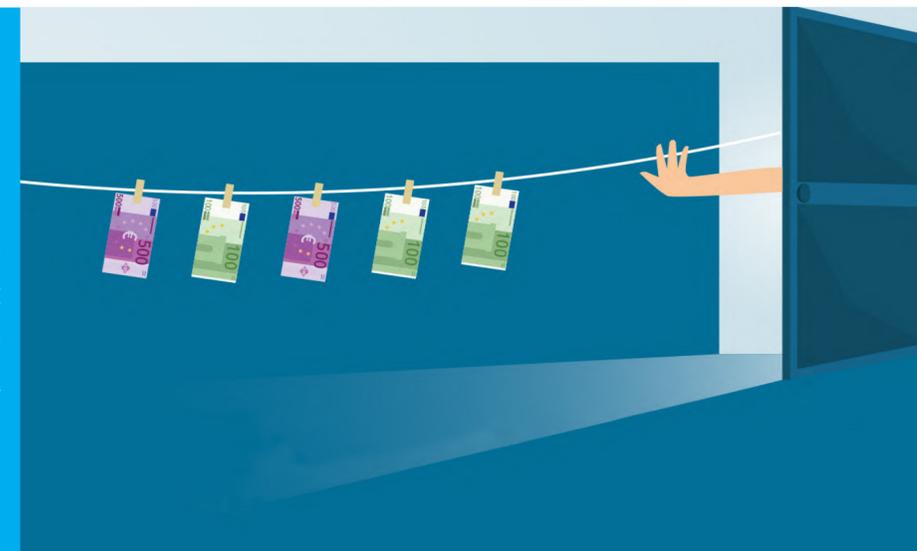


Working together as a single public authority

The FEC partners are the Dutch Authority for the Financial Markets (AFM), the Tax and Customs Administration, the Financial Supervision Office (BFT), De Nederlandsche Bank (DNB), the Fiscal Intelligence and Investigation Service (FIOD), the Financial Intelligence Unit (FIU-NL), the Public Prosecution Service (OM) and the police. The Ministry of Finance and the Ministry of Justice and Security are involved in the FEC as observers. Together, they are working as a single public authority to strengthen financial sector integrity.

The FEC's public-private partnership (FEC-PPP)

To strengthen financial sector integrity and prevent and fight financial crime, the FEC also works with private-sector parties that fulfil the role of gatekeepers to the financial system. Gatekeepers such as banks have an important role in protecting the financial system from abuse and crime. To do so, they need to carefully monitor who gets a bank account and what they use it for. Parties participating in this partnership are the Dutch Banking Association (NVB) and the four major banks (ABN AMRO, ING, Rabobank and de Volksbank). The task forces also include two other banks, Knab and Triodos Bank.



The FEC celebrates 25 years of cooperation



“

HENNIE VERBEEK

(FIU-NL - FEC COUNCIL MEMBER)

“What I value most is that we have reached a point where we can hold each other accountable for results and everyone’s contribution to them. To me, that is worth celebrating. Also, that in our current composition we may not always agree, but we always move forward together.”

”

“

JEROEN POELERT

(POLICE - CO-INITIATOR OF THE SCTF)

“What I value highly is that the FEC brings together multiple public-sector and private-sector organisations to address security issues. The FEC partners are the foundation of our rule of law. They are important organisations in our society.”

”

“

MEDY VAN DER LAAN

(NVB - FEC COUNCIL PPP MEMBER)

“In recent years, even closer collaboration has developed. Developing, practice-testing and applying knowledge together has great added value!”

”

In 2024, the FEC marked its 25th anniversary, a milestone we celebrated on 1 February with a jubilee event at the Tobacco Theatre in Amsterdam. Approximately 150 current and former FEC members convened to reflect on the FEC’s accomplishments over the past twenty-five years and to contemplate its future trajectory. In her opening address, Laura van Geest emphasised that over the past 25 years, the FEC has evolved into a distinctive public-private partnership. However, she cautioned that the threat posed by criminals requires constant vigilance and that there is no time for complacency.

The programme offered a balanced selection of retrospective analyses and forward-looking perspectives. In various line-ups, former and current FEC members and external experts shared their insights on past, present and future challenges and achievements. We reflected on the unique nature of the close collaboration between government agencies with supervisory, monitoring, investigative and prosecution tasks in the financial sector, and how private-sector parties have also been involved since 2011. Our unique cooperation is as important as ever to deter criminals and prevent them from abusing our financial system for money laundering and terrorist financing.





What did we achieve in 2024?

In 2024, the partners submitted a total of 74 signals, a slight decrease compared to 2023. In terms of type of signals, we see a further increase in information requests (around 68% of the total number of signals in 2024) and a decrease in information transfers (around 26% of the total number of signals in 2024). The share of expertise requests is traditionally the lowest (around 7%).

Year	Number of signals
2022	60
2023	77
2024	74

The top three most named risks in the signals received overall show the same picture as 2023:

- Illegal financial activities (approx. 31%)
- Fraud, forgery, embezzlement and deception (approx. 21%)
- Money laundering (approx. 12%)



Exchanging information

FEC Information Platform (IP)



HANS KERSBERGEN AND HENK TEN HOOPE
(TAX AND CUSTOMS ADMINISTRATION - IP MEMBERS)

“In the FEC Information Platform, the FEC partners exchange information. You can think of it as individual jigsaw pieces of a complex case, with each FEC partner contributing its own piece. It is encouraging to observe that, due to the resulting excellent information position, we are now able to resolve a case fully and take enforcement action.”



The FEC Information Platform (IP)

In the FEC, information is exchanged mainly through the FEC Information Platform (IP). This is a consultative structure in which FEC partner organisations share signals and exchange information on potential integrity issues that could threaten the financial system. Relevant information on the individuals or firms involved is then shared with appropriate partners, always within the confines of the applicable statutory frameworks. By cooperating in this manner, the FEC partners enhance each other’s information position and are better equipped to collectively address issues of corruption, money laundering, fraud and other integrity concerns.

What was done with the signals?

In 2024, results from 54 closed signals have been recorded. They are results achieved at the time a signal was closed. Results achieved after the signal was closed are not shown below. Among the results from the signals are the following:

- Knowledge was shared: 15
- Information received was considered in assessment: 7
- Administrative investigation was initiated: 6
- Criminal (preliminary) investigation was initiated: 6
- Tax investigation/firm assessment was initiated: 2
- Administrative measures were taken: 1



Exchanging information

IP data rooms



IP data rooms

Sometimes new information provides the missing piece of the puzzle, allowing a partner to continue their investigation. However, information may also prompt follow-up questions or create a need for further interpretation. Should coordination of a proper strategy be deemed necessary, the FEC unit organises a data room between the FEC partners involved – a closed consultation between experts from the partners involved in a signal. A total of 26 data rooms were organised in 2024, 4 up from the previous year. In 2024 it was notable that 5 signals involving an expertise request were submitted, all of which led to the creation of a data room. A wide variety of topics were addressed in the data rooms, including unfair commercial practices, mortgage fraud and boiler room fraud.

Year	Number of data rooms
2022	25
2023	21
2024	26





What did we achieve in 2024?

The activities that took place in 2024 under the FEC-TF programme were in line with the objectives. Monthly TF data rooms are organised in which around 25 members from 13 organisations (partners and participants) discuss analyses and possible interventions. Two intervention data rooms were held in the second half of 2024. Until 12 December 2024, partners and participants were asked to report possible interventions prior to intervention data rooms. FEC-TF programme activities will continue in 2025 based on the same objectives.



Exchanging information

FEC-TF programme



MAARTEN PIJLS

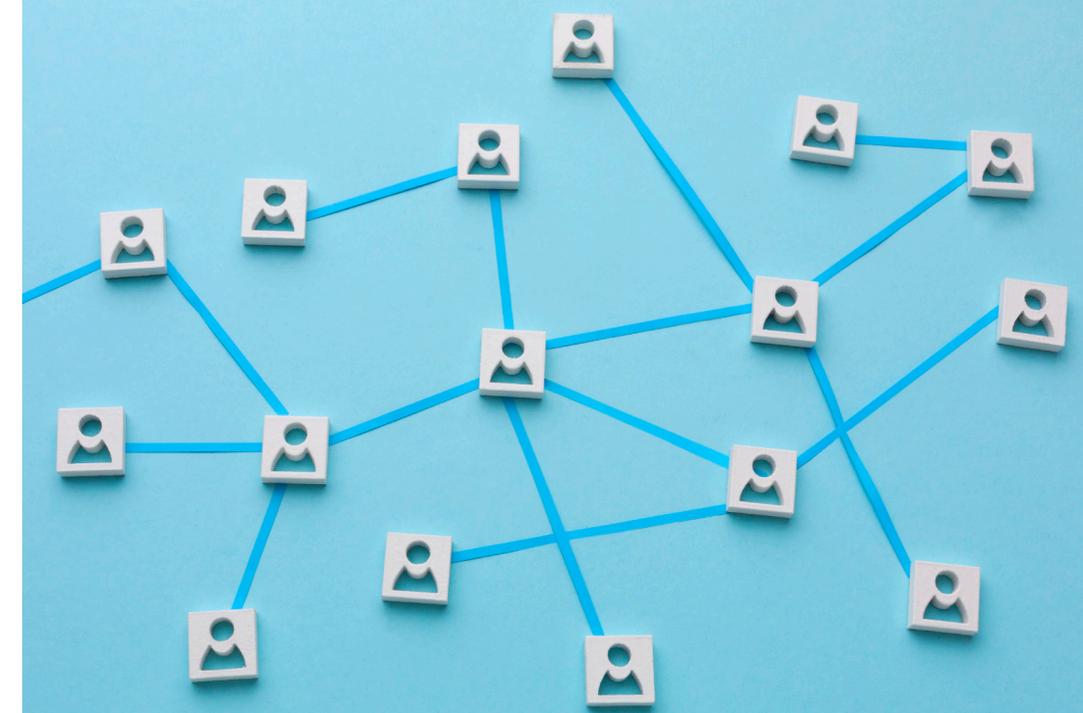
(PUBLIC PROSECUTION SERVICE – FEC-TF PROGRAMME COORDINATOR)

“In the fight against terrorist financing, the exchange of information and collaborative efforts are paramount. When we collaborate, we achieve more, and either of us can move on. In the programme, we exchange information, share images and coordinate interventions where possible.”



The FEC-TF programme has the following objectives:

- This programme identifies the financial networks of individuals known to the FEC partners and participants who can be connected to terrorism, as well as other relevant individuals and entities, on the basis of FEC signals. Among other things, this enabled clearer insight into the manner in which, and by whom, these individuals and entities are financed.
- In all cases in which the insight obtained gives grounds to do so, an intervention strategy is drawn up. This could involve tax, administrative or criminal law interventions.
- Using the knowledge obtained, tested typologies are drawn up and the partners embed the lessons learned into their strategies.



Sharing knowledge

FECademy and FFF



FECademies

The FEC, occasionally in collaboration with the Fiscal Intelligence and Investigation Service's Trends4FI, organises FECademies – information sessions where knowledge is shared by the FEC partners. Participants can use these insights when fighting financial crime. The FECademies are held online so that as many employees of both public-sector and private-sector partners as possible can participate. The online sessions were well attended and 2024 saw a further increase in participants.

DATUM	ONDERWERP	DEELNEMERS
26 February	Investment fraud	300
22 April	NRAs and the NL FinCrime Threat Assessment	375
27 May	Sanctions	370
1 July	AI summer programme: introduction	496
2 September	AI summer programme: detection by banks and supervisors	533
16 September	AI summer programme: detection and intelligence	612
11 November	Rogue gold trading	490

FECademy summer programme on artificial intelligence (AI)

Last summer's FECademy was all about artificial intelligence (AI). In a three-part series, we examined developments in AI that are relevant for gatekeepers, supervisors, and for investigation and prosecution.

The first session, which took place in July, served as an introduction to the theme, during which we addressed questions such as: what is the correct definition of AI? What developments in AI do we currently see in the FEC domain? How does AI affect financial sector integrity? And most importantly, how can we use AI effectively? We subsequently addressed the theme in greater depth in September. In two follow-up sessions, experts from the FEC partners, such as the Dutch Authority for the Financial Markets (AFM), banks, De Nederlandsche Bank, the Fiscal Intelligence and Investigation Service (FIOD), the Dutch Banking Association (NVB) and the police) highlighted developments and applications in AI from different perspectives.

Pre-opening of Fraud Film Festival (FFF) at the FEC

The Fraud Film Festival (FFF) is an annual, two-day event. As a partner of the FFF, we also contributed to this festival in 2024 and once again hosted its pre-opening. The ceremony took place on 10 October in the auditorium of De Nederlandsche Bank. The film screened, titled Dirty Money, Cartels and Underground Banks, addressed the theme of underground banking. This was followed by a panel discussion moderated by journalist Bart de Koning. The panelists, Hennie Verbeek-Kusters (FIU-NL), Robin de Jager (police) and Peter Huttenhuis (Public Prosecution Service), examined the issues surrounding underground banking and explored potential solutions.



What did we achieve in 2024?

- Four regular FECademies
- FECademy summer programme, consisting of 3 parts
- Pre-opening of Fraud Film Festival



Sharing knowledge

PPP Expert Platform (EP)



BOB KROON

(POLICE - EP CO-CHAIR)

“Knowledge can be multiplied by sharing it. The outcome emerges naturally. I see the FEC PPP Expert Platform as an organic network of reciprocity. It is imperative that knowledge sharing is an integral part of the culture of the EP. It is important to demonstrate interest in each other’s knowledge and skills.”



Knowledge sharing and exploration in 2024

In 2024, knowledge was shared in the EP of various trends and developments in financial crime, the dividend stripping phenomenon, the adapted money laundering typologies in relation to real estate, the strengthening of the chain for suspicious transactions and the trends observed in cash deposits and withdrawals. In addition, the findings of internal studies, analyses and projects regarding the fight against financial crime were discussed in the EP in the PPP context. The objective is to facilitate knowledge sharing (at the phenomenon level) among partners, thereby enabling them to more effectively fulfil their roles in maintaining the integrity of the financial system.

In addition, in 2024, the EP explored ways to cooperate with other gatekeepers such as professional and sector associations of civil-law notaries and trust offices. Implementation of this working method will begin in 2025.

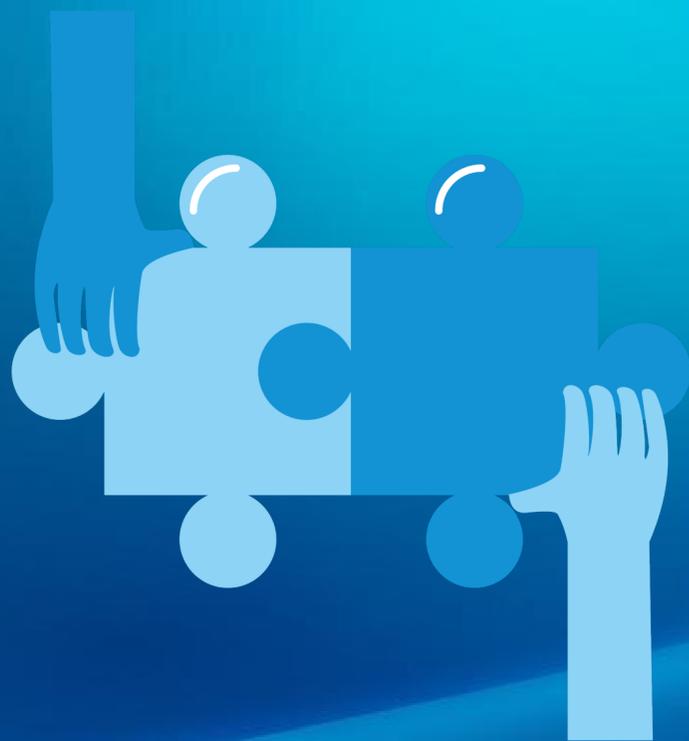
PPP Expert Platform (EP)

The FEC PPP Expert Platform (EP) is one of the driving forces behind the FEC PPP’s broad knowledge development and exchange. The platform consists of a permanent hub of experts who have extensive networks in both their own organisations and beyond, giving them access to the necessary knowledge and expertise. The EP undertakes various activities, such as:

- Sharing phenomenon-specific knowledge among gatekeepers and public-sector FEC partners;
- Exploring specific themes, which might result in an FEC PPP project;
- Building and maintaining knowledge networks on specific themes.



Partnering on projects



	Execution	Monitoring
PUBLIC-SECTOR PROJECTS	Money laundering using conduit companies	
	Providers of crypto-assets and crypto-asset services	
	Tackling illegal trust service providers	
PPP-PROJECTS	Third-party payment from the Netherlands	Money laundering through exploitative situations

Completed in 2024	Public-sector projects	PPP projects
	Abuse of legal entities	Cross-border VAT fraud

Partnering on projects

In the FEC we partner on projects, both as public-sector partners and in public-private partnerships (PPPs). By working in collaboration, we can enhance the understanding, skills and knowledge base of all involved. This helps prevent and combat criminal activities such as money laundering, corruption and terrorist financing.



Projects closed in 2024



HILDE GERRITSM

(TAX AND CUSTOMS ADMINISTRATION – PROJECT LEADER)

“It is always preferable to take preventative measures rather than remedial ones, a fact that is all the more true when the issue is the abuse of legal entities.”



Abuse of legal entities

The objective of this project was to understand how criminals abuse legal entities, thereby damaging financial sector integrity. Utilising this insight, the government can enhance its capacity to detect and address abuse promptly and effectively.

This initiative has yielded recommendations to enhance government-wide strategies in combating the abuse of legal entities. The monitoring phase will consider follow-up of these recommendations.

Cross-border VAT fraud

The aim of this project was to reduce financial and social damage caused by cross-border VAT fraud by raising awareness among those involved and increasing the quality of unusual transaction reports. Part of the intended effects were achieved. The project was successful in raising awareness among relevant employees in the reporting chain and the criminal business process was mapped in greater detail. In addition, a detection model was developed and specific intervention strategies were drawn up. Several banks have developed supplementary training modules for their employees, focusing on VAT fraud prevention and raising awareness.

The monitoring phase mainly consisted of following up on reported suspicious transactions, streamlining collaboration between the partners in this chain and applying effective interventions.



ONNO JANSEN

(TAX AND CUSTOMS ADMINISTRATION – PROJECT LEADER)

“Although cross-border VAT fraud may not be immediately visible or tangible to citizens, it has a significant impact on our society. It deserves our unwavering attention!”



Projects under monitoring in 2024



PPP - Money laundering through exploitative situations

The follow-up of signals submitted in the project is being monitored more closely. The transaction monitoring knowledge update was further developed and delivered in 2024.

Projects in progress in 2024



Money laundering using conduit companies

Reason: On 22 November 2021, at the request of the House of Representatives, the Conduit Companies Committee released its report. Among its findings and recommendations was the recommendation to conduct a follow-up FEC investigation into money laundering and conduit activities.

Approach: This project matches populations of conduit companies from different FEC partners, and quantitative and qualitative analysis is performed on the results to understand potential money laundering risks.

(Intended) results: The project's objective is to gain insight into the money laundering risks of Dutch conduit companies, to clarify whether these risks exist in the Netherlands and, if so, understand their nature. If these money laundering risks are present, the project aims, in the long term, to create awareness among gatekeepers (prevention) and to focus supervision and detection/prosecution (repression) through knowledge sharing.

Participating partners: Tax and Customs Administration, De Nederlandsche Bank, Public Prosecution Service and Fiscal Intelligence and Investigation Service/Anti-Money Laundering Centre.

Activities carried out and next steps

The project started in late October 2024 and yielded its first quantitative analysis in 2024. A qualitative analysis of such aspects as the nature and extent of these money laundering risks and any criminal offences will be started in 2025. Findings from the analyses will be reported on an anonymised basis in a knowledge document, which will be supplemented with possible recommendations and follow-up action. The project is expected to be completed in 2025.



Projects in progress in 2024



Providers of crypto-assets and crypto-asset services

Reason: The use of crypto-assets has boomed in recent years. As the sector grows, so does financial crime involving crypto assets. Examples include market manipulation (pump and dump), the use of crypto-assets in drug trafficking, human trafficking, helpdesk fraud, investment fraud, as well as in ransomware attacks demanding crypto-asset ransoms.

The crypto-asset market is set to change dramatically with the advent of new MiCAR and DAC regulations. The earlier FEC PPP crypto-asset project has revealed a need for the permanent exchange of knowledge between FEC partners. Knowledge building and exchange are essential for identifying and coping with crypto-asset market developments and associated risks in a timely manner.

Approach: The project consists of two phases:

Phase 1: This phase involves mapping the chain and the (government) mandate with regard to crypto-asset (service) providers, aligning concepts and definitions, and taking stock of current knowledge and knowledge needs among the public-sector FEC partners. A knowledge document will be prepared for this purpose.

Phase 2: This phase involves gaining knowledge that is currently lacking. This can be done, for example, in knowledge sessions or by preparing a financial crime script or barrier model. This will depend on the results achieved in phase 1.

(Intended) results: The project's objective is to gain insight into the various mandates of FEC partners with regard to crypto-asset (service) providers to clarify their information position and options for intervention. A further objective is taking stock of current knowledge and knowledge needs regarding crypto-asset (service) providers and inherent risks among the public-sector FEC partners, so that crypto-asset sector and the various types of misconduct are better understood in the FEC context. We aim to achieve these results as follows:

- Developing an FEC-wide overview of mandates
- Standardising terms and definitions with respect to crypto-assets
- Enhance cooperation and knowledge sharing between public-sector FEC partners
- Stepping up security and crime prevention

Participating partners: Tax and Customs Administration, De Nederlandsche Bank, Fiscal Intelligence and Investigation Service, police and Dutch Authority for the Financial Markets.



Activities carried out and next steps

Phase 1 was largely completed in 2024. The project team prepared a knowledge document containing an overview of the crypto-asset chain, the mandate for the chain, crypto-asset knowledge and information available at the FEC partners, investigation and enforcement powers and types of misconduct and (crime) risks in the crypto-asset sector.

The next step will be to add a standardised glossary of terms to the knowledge document. The parties are also working on the further completion of phase 2. This phase focuses on setting up an infrastructure for the permanent exchange of knowledge of crypto-assets throughout the FEC and further deepening understanding of crime risks in the crypto-asset sector.

Projects in progress in 2024



PPP – Third-party payment from the Netherlands

Reason: The Netherlands plays a significant role in the global narcotics trade, which has resulted in the circulation of substantial criminal funds within our borders. Criminals are finding it increasingly difficult to launder money through the financial system. Consequently, the methods they employ are becoming increasingly sophisticated. An example of such a method is illegal third-party payment (TPP). An example of a third-party payment is a payment made by a party (individual, company, institution) that did not purchase any goods or services and thus makes the payment on behalf of another party. The reason for this project is the desire to reduce third-party payment from the Netherlands.

Approach: The project consists of 5 phases:

Phase 1: Collecting tactical and strategic insights by FIU-NL and the national joint team of police and Fiscal Intelligence and Investigation Service.

Phase 2: Sharing knowledge and developing detection models by banks.

Phase 3: Initiating interventions and sharing insights with chain partners.

Phase 4: Providing education and raising awareness by FIU-NL and other chain partners.

Phase 5: Developing a system-based approach to combat this type of financial crime.

(Intended) results: The third-party payment project should yield more insights into the concrete risks and the extent to which the Netherlands is exposed to this phenomenon. The focus of the project is on recognition and detection of third-party payments by participating banks, identifying opportunities for (alternative) interventions and barriers, and creating awareness of the risks of illegal third-party payments.

Participating partners: FIU-NL, banks, police, Fiscal Intelligence and Investigation Service (FIOD), Public Prosecution Service

Activities carried out and next steps

Phases 1 to 3 began in 2024. Among other things, they have yielded insights into third-party payment, which are being shared with banks. Banks will use these insights to improve their detection of third-party payments.

Phases 4 and 5 will commence in 2025. In addition, a barrier model will be drawn up together with the CCV (Centre for Crime Prevention and Safety). The knowledge document is expected to be ready by the end of 2025.



Projects in progress in 2024



Tackling illegal trust service providers

Reason: This project is a follow-up to the first illegal trust services project. It was launched in 2023 to reduce illegal trust services provided in and through the Netherlands.

Approach: Based on an exploratory study, several institutions were selected that may be professionally and commercially engaged in cutting up trust services. These cases are shared with the project participants to gain more insights into specific case histories.

(Intended) results: The project's objective is to produce a knowledge document on cutting up trust services that will combine the insights gained from the exploration and implementation phases. This document is primarily intended for the FEC partners involved and may help them to identify these issues and take enforcement action.

Participating partners: De Nederlandsche Bank, Tax and Customs Administration, Fiscal Intelligence and Investigation Service, Public Prosecution Service

Activities carried out and next steps

The project consists of several phases. Phase 1 identified providers that may be cutting up trust services. A selection of providers was then made, which – based on information from internal and public sources – appear to cut up trust services. In phase 2, information on the selected providers was shared with the relevant chain partners through the FEC Information Platform (IP). The knowledge document will be produced in 2025.



MICHEL OERLEMANS

(DE NEDERLANDSCHE BANK - PROJECT LEADER)

“By combining information, we are creating new, valuable insights for tackling illegal trust services!”



Collaborating in task forces



FEC PPP Terrorist Financing Task Force (TFTF)

In 2024, the Serious Crime Task Force (SCTF) and the Terrorist Financing Task Force (TFTF) have again been working to fight serious crime and terrorist financing.



Working method

At a central location, private-sector parties work closely with FIU-NL to analyse, within the confines of statutory frameworks, selected subjects and operating methods presented by investigative agencies. These joint efforts result in valuable reports of unusual transactions to FIU-NL. FIU-NL can then qualify these transactions as suspicious, after which they are eligible for criminal investigation. Transactions that are qualified as suspicious are a vital component of these investigations, as they frequently contain crucial information that can be instrumental in preventing and detecting specific forms of crime or terrorist financing. At the same time, banks are using the insights gained to further strengthen their risk management and their gatekeeper role and take effective action against unethical customers.

Terrorist Financing Task Force (TFTF)

The Terrorist Financing Task Force (TFTF) was established in 2017 to enhance collaboration among both public-sector and private-sector parties, aiming to fight terrorist financing more efficiently and effectively and protect the financial sector. Initially a pilot project, the task force became a permanent feature in the FEC-PPP context in 2019.

At the forefront of innovation globally, the TFTF facilitates the exchange of subject-level information between public-sector and private-sector entities within the confines of statutory frameworks. The TFTF is highly regarded by representatives from both the public and private sectors.



What did we achieve in 2024?



Relevant information was again shared among covenant partners in the TFTF in 2024, with the aim of identifying, detecting and countering terrorist financing. This made a vital contribution to effective fulfilment of one of the tasks of both public-sector and private-sector partners in the context of their responsibility towards society. Specifically, it resulted in reports of unusual transactions, which – if declared suspicious by FIU-NL – were reported as suspicious transactions to the investigative authorities. A start was made in 2024 to measure, in a more structured way, how the output of FIU-NL and banks contributes to the fulfilment of the investigative and other tasks of the Fiscal Intelligence and Investigation Service and the police. In this way, the TFTF contributes to a more effective reporting chain. This helps banks comply with their AML/CTF obligations and enhances the information position of investigative authorities, which in turn can result in investigations.

Collaborating in taskforces



Serious Crime Taskforce (SCTF)

The SCTF was set up to identify the financial flows and networks of intermediaries that form a vital link in organised subversive crime. The objective of the SCTF is to combat organised crime by identifying and tackling (financial) facilitators that serve criminal networks engaged in excessive violence, corruption and money laundering.



What did we achieve in 2024?



Collaboration in the SCTF led to several investigations in 2024, detecting a total of well over 850 suspicious transactions worth around €40 million. Moreover, the results achieved by the SCTF cannot be assessed on the basis of quantitative data alone. For instance, they have produced insight into several as yet unknown networks and suspected facilitators. Also, to strengthen the gatekeeper role of private-sector parties, several knowledge sessions were held and modi operandi explored, so that these are now more easily identifiable.

The knowledge and leads gained will be utilised as effectively as possible. Efforts have been made to improve the follow-up process as part of detection and optimise the feedback loop towards gatekeepers. The SCTF's Fintell Alliance working group worked to improve the knowledge products and knowledge sessions in the past year.

Jubilee

The SCTF was launched as a pilot project in October 2019. It was decided in June 2021 to institutionalise the SCTF, converting it into a permanent PPP partnership. Accordingly, 2024 was an anniversary year for the task force. At a festive event marking its fifth anniversary, the SCTF's achievements were celebrated, and the first results of the evaluation were presented. Participants were unanimous in that a forward-looking approach would be effective and that the SCTF must be expanded, with mutual understanding.



Serious Crime Taskforce (SCTF)



SCTF LEADERSHIP

"5 years of SCTF also makes you realise that you need to start thinking and acting with respect to other types of barriers rather than merely detection. If you are capable of doing that as a collective, you can be really effective!"



External contacts



External contacts

The FEC maintains the various external contacts. Besides our regular stakeholder management, we maintain several domestic and foreign contacts.



Working visit by minister of Finance

Minister Steven van Weyenberg paid a working visit to the FEC on 26 February. The topic of discussion was collaboration between the various FEC partners and the challenges, opportunities and dilemmas in fighting money laundering and terrorist financing.

Foreign contacts

The FEC is regularly asked to make a presentation to foreign delegations interested in our partnership. In 2024, we did so for the following foreign guests:

- Delegation from the Danish National Special Crime Unit's Economic Crime Centre.
- Delegation of AML/CFT managers from Estonian banks and the Estonian banking federation
- Delegation from the Royal Canadian Mounted Police (RMCP)
- EU supervisors at an AML conference organised by De Nederlandsche Bank

Stakeholdermanagement

In 2024, the FEC updated its 2021 stakeholder analysis, producing the following overview:



Conferences and symposiums

FEC representatives participated in several conferences and symposiums in 2024. Besides gathering and sharing knowledge, these are excellent opportunities for maintaining and building the FEC network. In 2024, for instance, we participated in the annual conference on money laundering, meetings of the Financial Investigation Knowledge Platform, the conference on subversive crime of the Ministry of Justice and Security, the Financial Supervision Office's anniversary symposium and a Future of Financial Intelligence Sharing workshop on the Anti-Money Laundering Regulation.





Privacy Platform (PP) and Communications Platform



Privacy Platform (PP)

In the FEC Privacy Platform (PP), privacy experts from FEC partners share knowledge and expertise on personal data exchange. The aim is to jointly ensure that the exchange of information within the FEC context is executed carefully and within the confines of statutory frameworks. It also allows FEC partners to anticipate changes in laws and regulations in a timely manner.

In 2024, the Privacy Platform's activities included the accession of the Financial Supervision Office to the FEC and preparations for the entry into force of Dutch legislation on data processing by partnerships on 1 March 2025. Among other things, a start was made on conducting and reviewing Data Protection Impact Assessments (DPIAs).

Effective 1 March 2025, the WGS will come into force and the the new Lawfulness Advisory Committee (LAC) will take the place of the Privacy Platform. The LAC will advise on the lawfulness of data processing operations in the FEC. In 2024, preparation were made in anticipation of this.



Communications platform

The Communications Platform brings together communication advisers of all FEC partners and observers to align their FEC-related internal and external communications. Over the past year, the platform has taken an important step by developing a new, overarching communications strategy. The aim is to raise awareness of the FEC, strengthen cooperation between partners and create broad support for the joint fight against financial crime.



The FEC-year in numbers



How many FEC partners and participants are there?

8 public-sector partners

(Dutch Authority for the Financial Markets (AFM), Tax and Customs Administration (BD), Financial Supervision Office (BFT), De Nederlandsche Bank (DNB), Fiscal Intelligence and Investigation Service (FIOD), Financial Intelligence Unit (FIU-NL), Netherlands Police (NP))

5 private-sector partners

(ABN AMRO, ING, NVB, Rabobank, de Volksbank)

2 observers

(Ministry of Finance, Ministry of Justice and Security)

6 public-sector participants

(General Intelligence and Security Service of the Netherlands (AIVD), Tax and Customs Administration - Allowances (Toeslagen), Tax and Customs Administration - Customs (Douane), Immigration and Naturalisation Service (IND), Royal Netherlands Marechaussee (KMar), National Police Internal Investigations Department (Rijksrecherche))

2 private-sector participants

(Knab and Triodos Bank)



Exchanging information

number of signals:



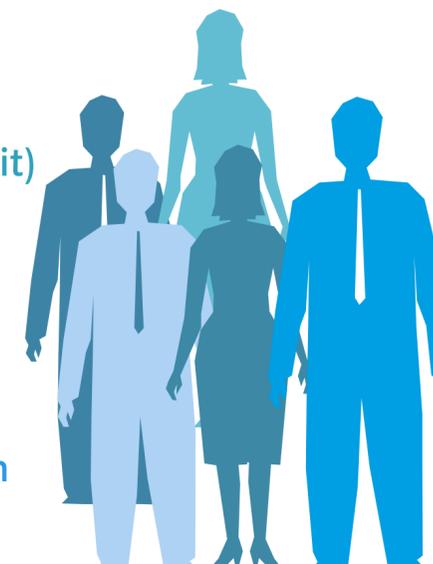
Number of data rooms: 26

Around **100** representatives of FEC partners and participants involved in public-sector projects and PPP projects

Around **50** individuals involved in the TF/BF programme (programme leadership, analysis team, TF data rooms, FEC unit)

Around **30** individuals involved in the Terrorism Financiering Taskforce (TFTF) and Serious Crime Task Force (SCTF) (task force leadership and focus group)

Around **120** representatives from the FEC partners involved in the various FEC bodies



LinkedIn
(operational since 2021))

3346 followers and 18 LinkedIn posts

Website visitors 23.031

7 FECademies

In addition to the four regular FECademies, we also hosted a FECademy summer programme in 2024. This comprised three modules and its theme was artificial intelligence (AI). The FECademies were attended by an average of 453 participants.



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