Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra

Eidgenössisches Finanzdepartement EFD
Staatssekretariat für internationale Finanzfragen SIF
Finanzsystem & Finanzmärkte

FATF Länderexamen 2026 - 2027

Lukas Regli, Projektleiter FATF Länderexamen, Staatssekretariat für internationale Finanzfragen SIF

VSKB-Legal und Compliance-Tagung 2026

11. Juni 2026, Bern

Agenda

1) internationale Standards
2) nationale Umsetzung
3) FATF Länderexamen
4) Fragen & Diskussion

Agenda

1) **internationale Standards**
2) nationale Umsetzung
3) FATF Länderexamen
4) Fragen & Diskussion

Financial Action Task Force (FATF)

Wer?

- international führendes Gremium zur Bekämpfung der Geldwäscherei, der Terrorismusfinanzierung und der Proliferationsfinanzierung

Was?

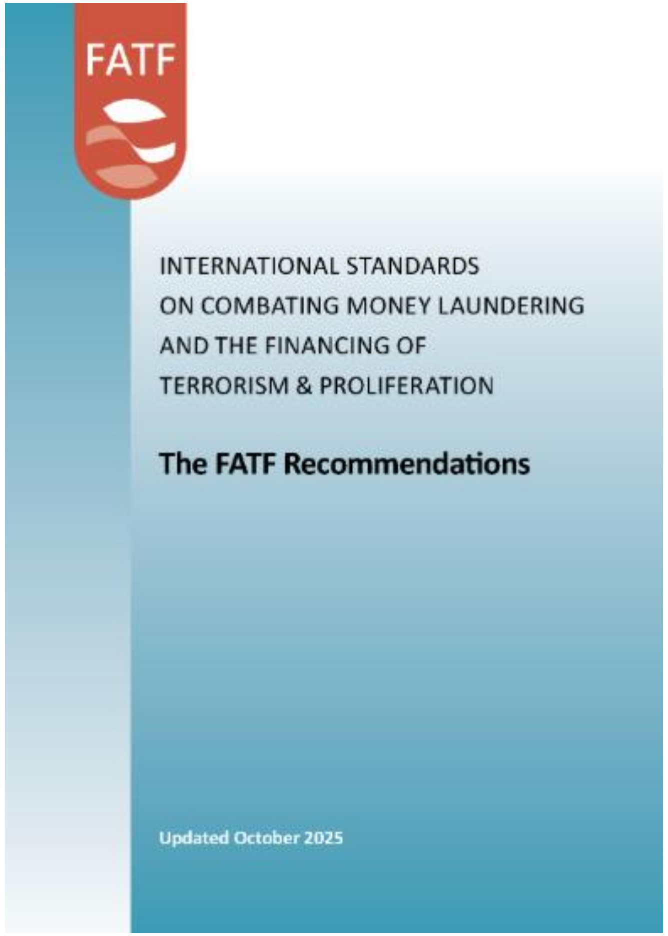
- Standard setzen; Länder prüfen; Risiken analysieren (ML/TF/PF und Vortaten); Listen führen (“graue Liste”, “schwarze Liste”)

Wo?

- 200 Jurisdiktionen: 40 FATF Mitglieder (38 Staaten, inkl. CH als Gründungsmitglied, EC and GCC) und 9 *FATF-style regional bodies*

Internationale Standards

- **40 Empfehlungen**, die einen umfassenden und kohärenten Rahmen bilden, die von den Ländern umgesetzt werden müssen, um GW/TF/PF wirksam zu bekämpfen (+ Interpretativnoten, Glossar, Guidance)
- Konkrete Umsetzung durch die verschiedenen **Länderprüfberichte**
- **Level playing field:** Instrument zur Gewährleistung der globalen Umsetzung wirksamer Massnahmen zur Bekämpfung von GW/TF/PF
- **Schutz des Finanzsektors** und damit Verbesserung des internationalen Handels und Investitionen, da Marktverzerrungen aus illegalen Finanzströmen verhindert werden



Internationale Standards

- **4. Prüfrunde**: 2014 bis 2024
- Verschiedene **Änderungen der Standards** (virtuelle Vermögenswerte, Transparenz juristischer Personen, Vermögensrückführung) + strategische Überprüfung der FATF in den Jahren 2020–2022, die zu einer **Überarbeitung der Bewertungsmethodik** und der Verfahrensregeln für die Prüfungen geführt hat
- Beginn der **5. Prüfrunde** im Oktober 2025

Agenda

1) internationale Standards

2) **nationale Umsetzung**

3) FATF Länderexamen

4) Fragen & Diskussion

955.0

**Bundesgesetz
über die Bekämpfung der Geldwäscherei und der Terrorismusfinanzierung**

(Geldwäschereigesetz, GwG)[1]

vom 10. Oktober 1997 (Stand am 1. März 2024)

**Bundesgesetz
über die Bekämpfung der Geldwäscherei und der Terrorismusfinanzierung**

(Geldwäschereigesetz, GwG)

Änderung vom 26. September 2025

**Bundesgesetz
über die Transparenz juristischer Personen und die Identifikation der wirtschaftlich berechtigten Personen**

(TJPG)

vom 26. September 2025

Nationale Umsetzung

- **Rechtsrahmen**
  - Geldwäschereigesetz (GwG)
  - Verordnungen: GwV; MGwV; GwV-FINMA; GwV-ESBK; GwV-EJPD; GwV-BAZG
  - Selbstregulierung: VSB20; Reglement SRO-SVV; SRO-Reglemente
- **Aktuelle Projekte**
  - Gesetz über die Transparenz juristischer Personen (TJPG)
  - Revision des Geldwäschereigesetzes (insbesondere Einführung Beraterregime, Stärkung des Sanktionssystems der SROs)

Herausforderungen in der Umsetzung

- **Unterschiedliche Anwendungsbereiche** Empfehlungen/GwG
- **Rolle der Selbstregulierung** und AOs
- **Gemeinsames Risikoverständnis** (SRO, parabanken Sektor)
- **Sanktionen** (wirksam, proportional und abschreckend)
- **Speditive Umsetzung** von Standard- und Gesetzesänderungen

Agenda

1) internationale Standards

2) nationale Umsetzung

3) **FATF Länderexamen**

4) Fragen & Diskussion

Was ist das «FATF Länderexamen»?

- *das* Instrument zur **Überprüfung der Umsetzung der FATF Standards**
- wiederkehrender **peer-review Prozess für weltweit >200 Jurisdiktionen**
- eine der **umfangreichsten Prüfungen** durch einen globalen Standardsetzer
- von der FATF Plenarversammlung verabschiedeter öffentlicher Bericht, der die technische Umsetzung der FATF Standards und deren effektive Resultate im Kampf gegen GW/TF/PF beurteilt…

…der sogenannte ***Mutual Evaluation Report (MER)***

Bedeutung des Länderexamens für die Schweiz

- **Zielsetzung =** Integrität, Reputation, Wettbewerbsfähigkeit
- **Kontext =** Verbrechensbekämpfung und Beitrag internationale Sicherheit
- **Chance =** effektives Dispositiv gegen GW/TF/PF präsentieren
- **Risiko =** Reputationsschäden, internationaler Druck, wirtschaftliche Folgen

➢ ***Erfolgreiches Länderexamen verlangt gemeinsames Engagement von Behörden und Privatsektor***

Was wird geprüft?

Wie wird die Effektivität geprüft?

Immediate Outcome 3	Supervisors [185] appropriately supervise, monitor and regulate financial institutions and VASPs for compliance with AML/CFT requirements, and financial institutions and VASPs adequately apply AML/CFT preventive measures, and report suspicious transactions. The actions taken by supervisors, financial institutions and VASPs are proportionate to the risks.

Core Issues to be considered in determining if the Outcome is being achieved

3.1. How well does licensing, registration or other controls implemented by supervisors or other authorities prevent, criminals and their associates from holding, or being the beneficial owner of a significant or controlling interest or holding a management function in financial institutions and VASPs? How well are breaches of such licensing or registration requirements detected and addressed as appropriate?

3.2. How well do the supervisors identify, understand, and promote financial institutions and VASPs understanding of ML/TF risks and AML/CFT obligations? This includes identifying and maintaining an understanding of the ML/TF risks in the different sectors and types of institutions, and of individual institutions and VASPs over time.

3.3. How well do financial institutions and VASPs understand the level and the nature of their ML/TF risks? This includes demonstrating understanding of the evolution of ML/TF risks over time.

3.4. How well do financial institutions and VASPs understand and apply AML/CFT obligations and mitigating measures and appropriate to their business activities, including as regards:

(a) the CDD and record-keeping measures (including in relation to beneficial ownership information and ongoing monitoring)?

(b) the enhanced or specific measures for:

(i) PEPs,

(ii) correspondent banking,

(iii) new technologies,

(iv) wire and virtual asset transfer rules, and

(v) high-risk countries identified by the FATF?

(c) their AML/CFT reporting obligations? What are the practical measures to prevent tipping off?

(d) internal controls and procedures and audit requirements (including at group level where applicable) to ensure compliance with AML/CFT requirements?

(e) to what extent are there legal or regulatory requirements (e.g. financial secrecy) impeding implementation of AML/CFT obligations and mitigating measures?

3.5. With a view to mitigating the risks, how well do supervisors monitor and/or supervise the extent to which financial institutions and VASPs are complying with their AML/CFT requirements?

3.6. To what extent has monitoring and/or supervision, including outreach, training and applying remedial actions and/or effective, proportionate and dissuasive sanctions, where appropriate, had a demonstrable positive impact on compliance by financial institutions and VASPs over time?

Wie wird die Effektivität geprüft?

a) *Examples of Information that could support the conclusions on Core Issues*

1 Contextual factors regarding the size, composition and structure of the financial and VASP sectors and informal or unregulated sector (*e.g. number and types of financial institutions (including MVTS) and VASPs licensed or registered in each category (high, medium low risk, other); types of financial and VASP (including cross-border) activities; relative size, importance and materiality of sectors*).

2 Financial institutions and VASPs' information relating to risks and general levels of compliance (*e.g.* internal *risk* assessments, AML/CFT policies, procedures and programmes, trends and typologies reports).

3 Number and nature of license/registration applications approved/rejected, withdrawal of applications and reasons for rejections/withdrawals (including information on fit and proper controls), as well as other related examples of illicit activity detected.

4 Supervisors' risk assessment and/or models, manuals and guidance on AML/CFT (*e.g. operations manuals for supervisory staff; publications outlining AML/CFT supervisory / monitoring approach; supervisory circulars, good and poor assessment practises, thematic studies; annual reports*).

5 Information on supervision (*e.g. on how the frequency, scope and nature of monitoring and inspections has been adjusted in line with risk, on-site and off-site or other type of visits, and the description of these main supervisory tools); nature and quality of supervisory communication with regulated entities (i.e. its comprehensiveness in relation to the subject-matter, identified risks and supervisory priorities).*

6 Information on what additional measures or additional supervisory actions have been applied by the *competent* authorities in the home country to financial groups operating in host countries where the minimum AML/CFT requirements are less strict than the home country (*e.g. placing additional controls on the financial group, requesting the financial group to close down its operations in the host country*).

7 *Information on supervisory findings and subsequent actions including number and nature of breaches identified; required remedial actions, sanctions and their enforcement (e.g. including but not limited to number of warnings, corrective actions, reprimands, directions, restrictions, fines) applied, examples of cases where sanctions and other remedial actions have been applied and improved AML/CFT compliance*). Information on how financial institutions and VASPs adjusted/improved their compliance practices in response to supervisor's actions.

8 Where appropriate and applicable, and further to a risk-based approach to the adoption of technologies, information on how technology (e.g. advanced data analytics) is used by supervisors and the private sector, to support the understanding of obligations and/or risks identified, as well as assisting in AML/CFT tasks.

9 Information on supervisory engagement and outcomes of such engagement, with the industry, the FIU and other competent authorities, as well as other authorities in the country (e.g. prudential supervisor) on AML/CFT issues (*e.g. promoting a risk-based approach, providing guidance and training, organising meetings or promoting interactions with financial institutions and VASPs*). This may include case studies of engagement with the private sector to promote the implementation of proportionate measures in line with the risks.

10 Examples of compliance by financial institutions and VASPs (*e.g. sanitised cases; typologies on the misuse of financial institutions and VASPs*). This could include, among other things, case studies of compliance best practices, compliance breaches (real/potential), examples of serious misconduct or harm, and information on how supervisory action made a direct/indirect impact on a firms' compliance controls.

11 Information on compliance by financial institutions and VASPs (e.g. frequency of internal AML/CFT compliance review proportionate to risks; frequency and quality of AML/CFT training; time taken to provide competent authorities with accurate and complete CDD information for AML/CFT purposes (upon request); accounts/relationships rejected due to incomplete CDD information; wire and VA transfers rejected due to insufficient requisite information; trends identified from transaction monitoring and reporting).

12 Information on STR reporting and other information as required by national legislation (e.g. number and quality of STRs submitted and the value of associated transactions; number and proportion of STRs from different sectors; examples of STRs that contributed to investigations, quality of the information provided in the STR; the types, nature and trends in STR filings corresponding to ML/TF risks; average time taken from detection to filing an STR).

b) *Examples of Specific Factors that could support the conclusions on Core Issues*

13 What are the measures implemented to prevent the establishment or continued operation of shell banks in the country?

14 To what extent are "fit and proper" tests or other similar measures used with regard to persons holding senior management functions, holding a significant or controlling interest, or professionally accredited in financial institutions and VASPs?

15 What measures are taken to identify, license or register, monitor and sanction as appropriate, persons who carry out MVTS and virtual asset services or activities (including illegally)?

16 What measures do supervisors employ in order to assess the ML/TF risks of the sectors and entities they supervise/monitor? How often are the risk profiles reviewed and what are the trigger events (e.g. changes in management or business activities)? How does the supervisor monitor the evolving risk environment and is it able to respond promptly?

17 To what extent are supervisors directing their focus effectively to higher or emerging ML/TF risks? Are there proportionate, risk-based measures in place to address medium and lower risks effectively?

18 What measures does the country have in place to encourage the adoption of simplified measures where lower risks are identified? To what extent do supervisors engage in outreach with the private sector, provide guidance to promote a risk-based approach and encourage the adoption of simplified measures, where appropriate?

19 What measures and supervisory tools are employed to ensure that financial institutions and VASPs (including financial groups) are regulated and comply with their AML/CFT obligations? To what extent has this promoted the use of the formal financial system? Conversely, what measures are being taken in regard to the displacement of risk and to ensure that firms do not engage in blanket de-risking of sectors?

20 To what extent do the frequency, intensity and scope of on-site and off-site inspections relate to the risk profile of the financial institutions (including financial group) and VASPs?

21 Do supervisors have adequate resources and training to conduct supervision or monitoring for AML/CFT purposes, taking into account the size, complexity and risk profiles of the sector supervised or monitored?

22 What is the level of co-operation between supervisors and competent and other authorities in relation to AML/CFT (including financial group ML/TF risk management) issues? Under which circumstances supervisors share or seek information from other competent authorities with regard to AML/CFT issues (including market entry)?

23 What are the measures implemented to ensure that financial supervisors have operational independence so that they are not subject to undue influence on AML/CFT matters?

24 What are the measures in place to identify and deal with higher and lower risk customers, business relationships, transactions, products and countries?

25 To what extent do financial institutions and VASPs implement measures, proportionate to the type and level of risk for the various risk factors?

26 What are the policies, controls and procedures employed by financial institutions and VASPs to comply with AML/CFT obligations and how are these adjusted and adapted to the identified risks?

27 How well are financial institutions and VASPs conducting and documenting their ML/TF risk assessments, and keeping them up to date?

28 To what extent does the manner in which AML/CFT measures are applied, by financial institutions and VASPs impede the legitimate use of the formal financial system and hinder financial inclusion?

29 To what extent do the CDD and enhanced, simplified or specific measures vary according to ML/TF risks across different sectors / types of institution and individual institutions? To what extent is business refused when CDD is incomplete? What is the relative level of compliance between international financial groups and domestic institutions?

30 To what extent is there reliance on third parties for compliance with AML/CFT requirements and how well are the controls applied?

31 How well do financial institutions and groups and VASPs and groups (as applicable) ensure adequate access to information by their AML/CFT compliance function?

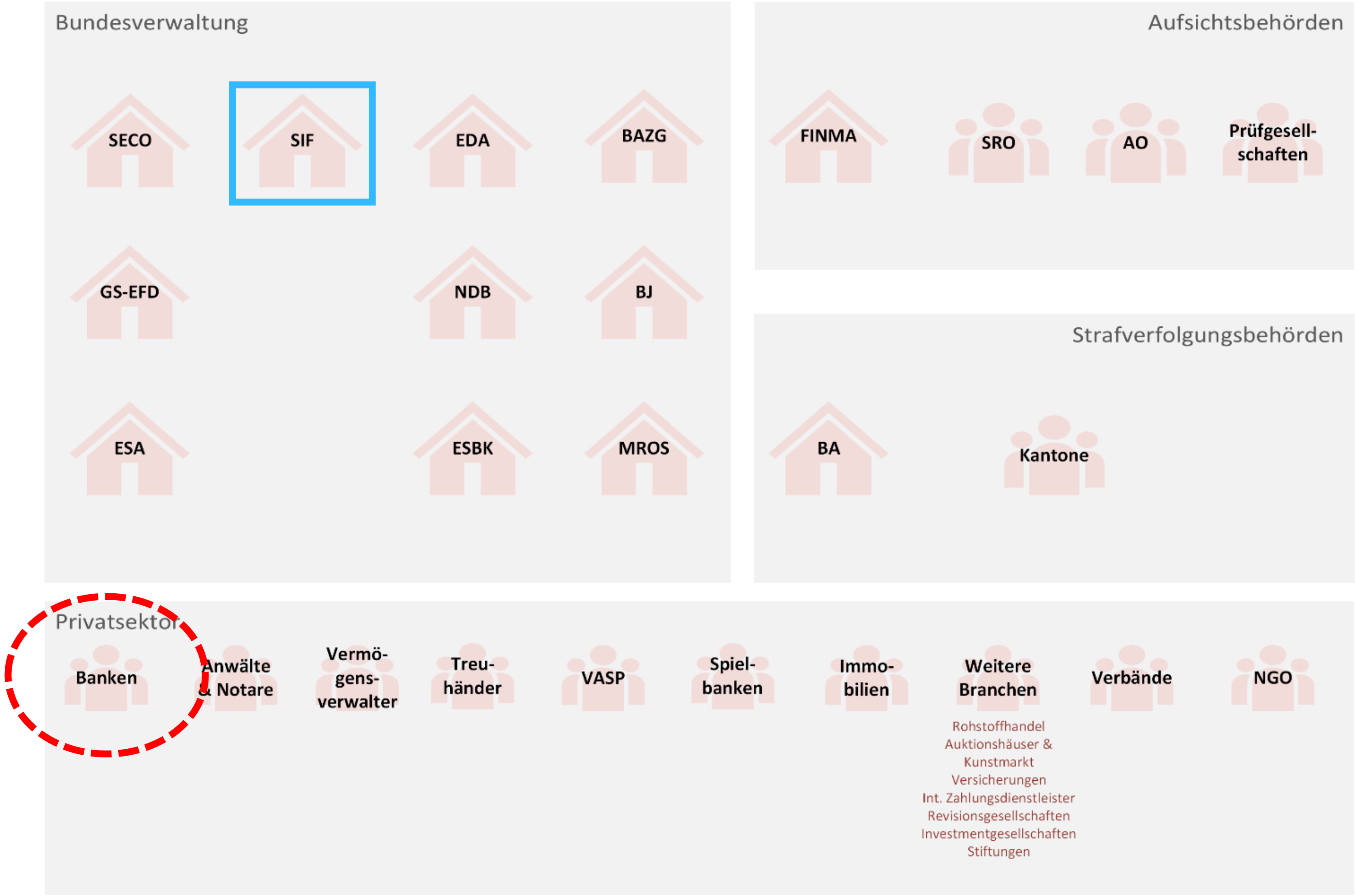
32 Do internal policies and controls of the financial institutions and VASPs (including when operating in a group context where appropriate) enable timely review of: (a) complex or unusual transactions, (a) potential STRs for reporting to the FIU and (c) potential false-positives? To what extent do the STRs reported contain complete, accurate and adequate information relating to the suspicious transaction?

33 How are AML/CFT policies and controls communicated to senior management and staff? What remedial actions and sanctions are taken by financial institutions and VASPs when AML/CFT obligations are breached?

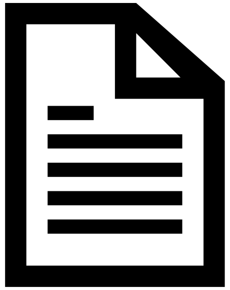
34 Do financial institutions and VASPs have adequate resources and training to implement AML/CFT policies and controls relative to their size, complexity, business activities and risk profile?

35 How well is feedback provided, by competent authorities, to assist financial institutions and VASPs in detecting and reporting suspicious transactions?

Wer ist am Länderexamen beteiligt?



Wo stehen wir, wo gehen wir hin?



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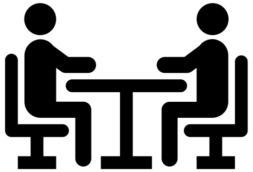


Switzerland - Follow-Up Report 2020

IO1	IO2	IO3	IO4	IO5	IO6	IO7	IO8	IO9	IO10	IO11
SE	ME	ME	ME	ME	SE	SE	SE	SE	SE	SE

HE = high level of effectiveness | **SE** = substantial level of effectiveness | **ME** = moderate level of effectiveness | **LE** = low level of effectiveness

Switzerland - Follow-Up Report 2023

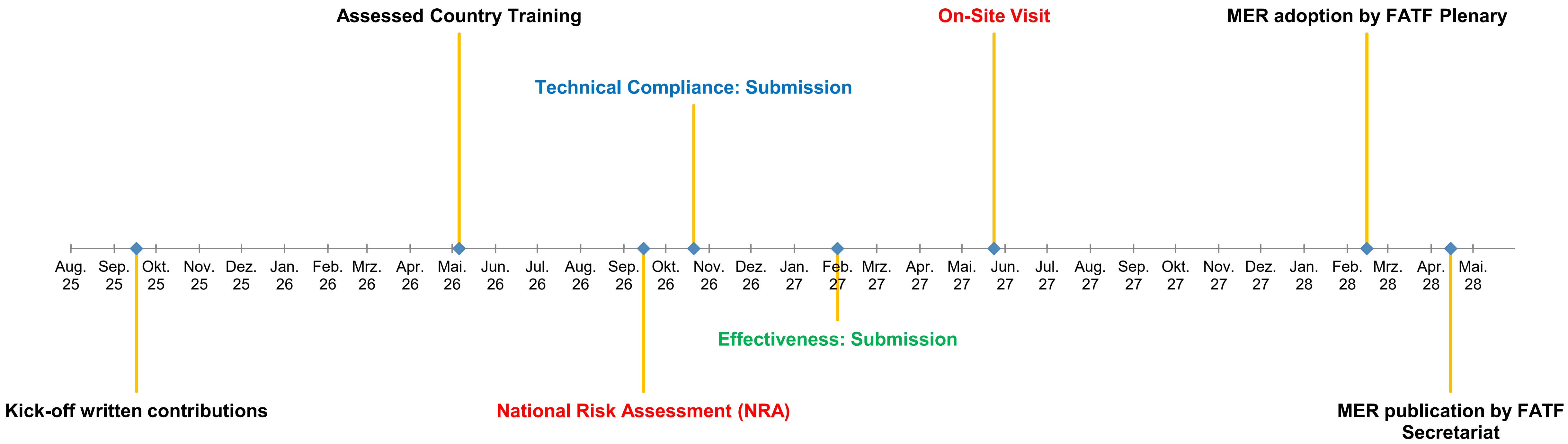
R.1 - Assessing risk & applying risk-based approach	R.2 - National cooperation and coordination	R.3 - Money laundering offence	R.4 - Confiscation and provisional measures	R.5 - Terrorist financing offence	R.6 - Targeted financial sanctions related to terrorism & terrorist financing	R.7 - Targeted financial sanctions related to proliferation	R.8 - Non-profit organisations
LC	LC	LC	LC	LC	LC	C	LC
R.9 - Financial institution secrecy laws	R.10 - Customer due diligence	R.11 - Record keeping	R.12 - Politically exposed persons	R.13 - Correspondent banking	R.14 - Money or value transfer services	R.15 - New technologies	R.16 - Wire transfers
C	LC	C	LC	LC	C	LC	LC
R.17 - Reliance on third parties	R.18 - Internal controls and foreign branches and subsidiaries	R.19 - Higher-risk countries	R.20 - Reporting of suspicious transactions	R.21 - Tipping-off and confidentiality	R.22 - DNFBPs: Customer due diligence	R.23 - DNFBPs: Other measures	R.24 - Transparency and beneficial ownership of legal persons
LC	LC	C	LC	LC	PC	PC	LC
R.25 - Transparency and beneficial ownership of legal arrangements	R.26 - Regulation and supervision of financial institutions	R.27 - Powers of supervisors	R.28 - Regulation and supervision of DNFBPs	R.29 - Financial intelligence units	R.30 - Responsibilities of law enforcement and investigative authorities	R.31 - Powers of law enforcement and investigative authorities	R.32 - Cash couriers
LC	LC	LC	LC	C	C	LC	LC
R.33 - Statistics	R.34 - Guidance and feedback	R.35- Sanctions	R.36 - International instruments	R.37 - Mutual legal assistance	R.38 - Mutual legal assistance: freezing and confiscation	R.39 - Extradition	R.40 - Other forms of international cooperation
C	LC	PC	LC	LC	LC	LC	LC

C = compliant | **LC** = largely compliant | **PC** = partially compliant | **NC** = non-compliant

144. After the discussion of the MER, the Plenary will place the country in enhanced follow-up if any one of the following applies:

a) it has 5 or more PC ratings for technical compliance, or
b) it has 1 or more NC ratings for technical compliance, or
c) it is rated PC on any one or more of R.3, 5, 6, 10, 11 and 20
d) it has a moderate level of effectiveness for 6 or more of the 11 effectiveness outcomes, or
e) it has a low level of effectiveness for 1 or more of the 11 effectiveness outcomes.

Wichtigste Meilensteine



Was bedeutet das Länderexamen für mich?

- **anhaltende Einhaltung und Umsetzung der GW/TF/PF-Regulatorien**
  - Risikobewusstsein unter Berücksichtigung der NRA(s)
- **auf Anfrage des SIF oder anderer Behörden**
  - schriftliche Eingaben: Informationen, Statistiken, Fallstudien etc.
  - Vor-Ort Besuch: Identifikation und Vorbereitung von Auskunftspersonen
- **Koordination und Unterstützung durch das SIF**

Agenda

1) internationale Standards
2) nationale Umsetzung
3) FATF Länderexamen
4) **Fragen & Diskussion**

Besten Dank für Ihre Aufmerksamkeit

Projektteam FATF Länderexamen

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