



Mandate of the interdepartmental coordinating group on combating money laundering, the financing of terrorism and the financing of proliferation

According to the Federal Council decision of 14 March 2025

a) Composition and organisation

The interdepartmental coordinating group on combating money laundering, the financing of terrorism and the financing of proliferation (CGMF) is a permanent interdepartmental structure set up by the Federal Council in 2013. Its mandate is to coordinate policy on combating money laundering, terrorist financing and proliferation financing, and to assess risks in these areas.

The CGMF is headed by the FDF (SIF) and is composed of members of management from the following offices¹: FDF (SIF, FOCBS); FDJP (fedpol, FOJ, FGB); DDPS (FIS); FDFA (DIL, PSD); EAER (SECO); FINMA and the OAG. With the aim of ensuring wider information and consultation as needed, it periodically invites other concerned departments to its meetings.

The CGMF meets regularly. It carries out its tasks while observing the principle of confidentiality. It may delegate certain tasks to technical working sub-groups.

The CGMF has five permanent technical working sub-groups, which meet regularly and have been assigned specific tasks in the areas of risk assessment, information exchange, coordination of operational matters, processing of foreign terrorist lists, liaison between the authorities and the private sector, and information exchange and coordination in relation to proliferation financing. The sub-groups are generally staffed from the offices involved in combating money laundering, terrorist financing and proliferation financing, and their composition may vary according to the specific needs identified by the CGMF.

b) Tasks

The CGMF:

- serves as a platform for exchanging information and coordinating all issues relating to policy to combat money laundering, terrorist financing and proliferation financing;
- continuously assesses the risks of money laundering, terrorist financing and proliferation financing, and coordinates and implements the national risk assessment and the sectoral risk assessments;
- ensures that Switzerland's policy to combat money laundering, terrorist financing and proliferation financing is consistent with international arrangements;
- informs the departments and offices concerned of the results of its work;

¹ For the purposes of readability, the more precise term "offices" is generally used in this mandate. It is intended to also include "authorities"; however, the term "authorities" is sometimes used more generically.

- ensures that the private sector is informed and consulted (with the proviso that the private sector respects confidentiality of information) in the appropriate manner (e.g. by communicating the results of risk assessments);
- regularly (at least once a year) reports to the Federal Council about its activities and, where there is a need for action, submits – via the department concerned – proposals for adjusting the arrangements to combat money laundering, terrorist financing and proliferation financing, or other measures (e.g. proposals for measures aimed at mitigating or avoiding the risks identified).

c) Technical working sub-groups

1. Risk Assessment sub-group (led by fedpol)

- This sub-group prepares regular updates on the national risk assessment based on changes in risks, the authorities' needs and their observations, while taking the available resources into account.
- The sub-group submits proposals to the CGMF on subjects for sectoral analysis reports and the distribution of responsibilities (including the overall lead), planning and distribution of the related tasks. It provides guidance during sectoral risk assessments, as well as methodological support. It ensures that risk assessments are carried out using a consistent and comparable methodology and in accordance with international best practice. The FATF Recommendations form the basis for this.
- The sub-group may commission one or more offices to carry out the assessments, or some of them; the offices are required to support the sub-group in its assessment work. For the duration of a specific assessment, each member whose involvement is necessary on account of the office's remit or expertise provides an expert to assist with carrying out the assessment.
- The sub-group members supply the information and consolidated data, particularly statistical data, needed to carry out assessments in good time and in the appropriate form. When its tasks so require, the sub-group may request such information from the federal and cantonal authorities and the private sector. The sub-group reviews and interprets the available statistics, checks them for consistency and selects the most relevant statistics for performing a risk assessment.

2. Operational Issues sub-group (led by SIF)

- The sub-group serves as a platform with which the offices responsible for combating money laundering, terrorist financing and proliferation financing can exchange information and coordinate all issues with regard to operational matters. These mainly concern the implementation of anti-money laundering legislation at national level, including through jurisprudence, and collaboration between national authorities on administrative and penal matters.
- The exchange of information between offices complies with official secrecy.

3. Terrorist Lists sub-group (led by SIF)

- Based on Article 22a of the Anti-Money Laundering Act (AMLA), the sub-group

examines the data transmitted to Switzerland by third countries under United Nations Security Council Resolution 1373.

- The head of the sub-group, after consulting the other members, decides whether to pass on the data received to the supervisory authorities (FINMA, FGB, intercantonal authority and central office) so that they may transmit the information to financial intermediaries subject to their supervision, to supervisory bodies and to self-regulatory organisations.
- As part of its tasks, the sub-group chair coordinates contacts with the authorities in third countries.

4. Private Sector Contact Group (led by SIF)

- The Contact Group aims to strengthen dialogue between the authorities and the private sector on combating money laundering, terrorist financing and proliferation financing. This general and multidisciplinary dialogue must focus on results and the upcoming risk assessment activities, as well as on ways to reduce these risks.
- In particular, it must allow the main Federal Administration offices involved in combating money laundering, terrorist financing and proliferation financing to obtain the views of the private sector on identifying and managing the horizontal and/or sectoral money laundering, terrorist financing and proliferation financing risks to which it is exposed.
- The private sector contacts must come from the main industries subject to the AMLA. As needed and depending on the topics discussed, representatives from offices other than those that are CGMF members, or other representatives from the private sector, especially those from industries not subject to the AMLA or from academia, may be invited.

5. Proliferation Financing sub-group (led by SECO)

- The sub-group serves as an information exchange and coordination platform for the offices responsible for combating the financing of the proliferation of weapons of mass destruction.
- The sub-group's main objectives are to enable experts to exchange information on a regular basis, to enhance their understanding of proliferation financing issues and to monitor developments in the associated risks.
- In order to strengthen the defence mechanism, particularly in the area of criminal law and information exchange, the sub-group may assess the effectiveness of the existing mechanism and, if necessary, recommend adjustments.
- The exchange of information between offices complies with official secrecy.

d) Procedure for sectoral risk assessments

- The sectoral assessments focus on money laundering, terrorist financing and proliferation financing topics that are particularly important and urgent from a domestic perspective, or on topics which need assessing due to international recommendations (especially from the FATF).
- Each sectoral analysis report is prepared under the auspices of a competent office, which is responsible for content and communication. The Risk Assessment sub-

group may involve offices other than CGMF member offices in its work. In specific cases where a topic cannot be clearly assigned or where it affects several offices equally, more than one office may assume responsibility.

- At the proposal of the Risk Assessment sub-group and after a discussion within the CGMF, the sub-group submits the topic, together with a proposal on collaboration, organisation and publication, to the competent office(s). If the CGMF is unable to agree on the subject of or responsibility for a sectoral analysis, or if one of the offices to which the CGMF has assigned responsibility disagrees with the assignment, the decision is referred to the Federal Council by the FDF, as the CGMF lead.
- The Risk Assessment sub-group provides guidance and support for sectoral risk assessments. This work includes discussing draft reports, providing methodological support to the office(s) and leveraging the know-how of the offices that are members of the sub-group, especially fedpol as the sub-group's own competent office. In particular, the sub-group ensures that consistent methodology in line with international standards is observed. Wherever possible, the competent office takes account of the comments made during sub-group discussions.
- The draft report and potential disagreements within the sub-group are handled by the CGMF with the aim of finding a consensus between all members with regard to the report's contents. If the report contains material or political recommendations, it is submitted to the Federal Council by the department(s) of the competent office(s). Where the report's recommendations are purely technical in nature, the draft is submitted to the Federal Council if the CGMF is unable to agree on key elements of the content. The Federal Council settles the differences.
- After the reports presenting a consensus view are adopted by the CGMF or discussed by the Federal Council, they are published by the competent office(s) as CGMF reports, with the remark "coordinated by the [name of competent office(s)]". The competent office is responsible for communication and for answering questions. Where there is more than one competent office, they agree on which office is responsible for communication. Other interested offices may publish the report on their website by means of a direct link to the site of the competent office.