Annual Report 2020



Contents

Foreword1	
The Year in Review2	
Launch of the New StAR Website4	
Country Engagements6	
Knowledge & Innovation12	
Policy & Partnerships16	
Looking Ahead20	
Management, Staffing & Funding21	

© 2021 International Bank for Reconstruction and Development / The World Bank 1818 H Street NW, Washington, DC 20433 Telephone: 202-473-1000 Internet: star.worldbank.org Email: starinitiative@worldbank.org Twitter: @returningassets Some rights reserved.

StAR-the Stolen Asset Recovery Initiative-is a partnership between the World Bank Group and the United Nations Office on Drugs and Crime (UNODC) that supports international efforts to end safe havens for corrupt funds. StAR works with developing countries and financial centers to prevent the laundering of the proceeds of corruption and to facilitate more systematic and timely return of stolen assets.

This work is a product of the staff of The World Bank and the United Nations Office on Drugs and Crime with external contributions. The findings, interpretations, and conclusions expressed in this work do not necessarily reflect the views of The World Bank its Board of Executive Directors, or the governments they represent, the United Nations, or its Member States. The World Bank and the United Nations do not guarantee the accuracy of the data included in this work. The boundaries, colors, denominations, and other information shown on any map in this work do not imply any judgment on the part of The World Bank or the United Nations concerning the legal status of any territory or the endorsement or acceptance of such boundaries.

Nothing herein shall constitute or be considered to be a limitation upon or waiver of the privileges and immunities of The World Bank or the United Nations, all of which are specifically reserved.

Design by Sensical Design

Foreword

Whilst COVID-19 is named after 2019, it is 2020 that will be that should not lead to despondency; guite forever and inextricably linked to it. Whatever we make of the contrary, it should add fuel to our fire. this year-whether we mourn the incredible loss of life and I am glad to say that we have been the lack of social interaction-or rejoice in the wealth of doing our part on that front: in 2020, family time and our rekindled interest in the natural world, StAR still managed to provide assistance it was a year like no other. We left the familiar surroundings to 18 countries, trained more than a thouof our offices, taking a few things for the supposed few sand people (investigators, prosecutors, judges, justice weeks that we would be out, and now, one year later, are dept/finance) and contributed to almost 30 large scale still at home (at least here in the US). Had it been a film, we policy events including the UN Global Compact Leaders would probably have dismissed it as too improbable. Summit, International Anti-Corruption Conference and In response we did what humans do: we adapted, and multiple UNCAC-related meetings. Importantly, we also we harnessed the power of technology. For all the expresincreased our knowledge and research efforts, as recomsions of exasperations at yet another video-call, we would mended in last year's evaluation. This year, and the next, not have been able to continue in anything like the way we will see a lot of that work come to fruition, as we provide have, had it not been for Zoom, Webex, Teams and all the the solid data on asset recovery that is so desperately other platforms we mastered this year. We couldn't have needed, publish our report on the enforcement of foreign

done it without them. orders, shine a spotlight on the role of "safe havens" in

Of course, criminals have adapted as well. With processing the proceeds of corruption and the professions people spending so much more time online, cyber and that enable this, and more. However, it is not just about the internet-based criminality boomed. Organized crime was production of more research and data; we have to make guick to step in to lend "a helping hand" to businesses in sure the key messages reach policy makers and practifinancial distress and reports on the diversion of public tioners. Our new website, which we spent all of 2020 develfunds, intended to fight the COVID crisis, are proliferating. oping and launched in January this year is a critical part of From an anti-corruption point of view, the allocation of that. Equally important is our engagement with the most COVID funds to politically connected firms or otherwise relevant policy bodies. We look forward to the two large linked to persons in power is particularly disturbing. There scale policy events this year, the UN General Assembly is something extra abhorrent about self-enrichment in a Special Session on Corruption in June and the Conference time of a general crisis when human suffering is so present of States Parties to the UNCAC in December, and the many and visible. When coupled with the ways authoritarian smaller ones, to showcase this work and ensure that asset governments have used the crisis to curtail fundamental recovery gets the attention it deserves-we owe it to all freedoms and impose restrictive measures on civil those who are suffering the consequences daily.

society, one has to conclude that 2020–like 2019–has been a hard year for democracy and anti-corruption. But - Emile van der Does de Willebois on behalf of the StAR team

The Year in Review

Despite the pandemic which overshadowed the better part of 2020, where requested, StAR continued its commitment toward providing support related to asset recovery. The team had a busy year across its three workstreams of country engagement, knowledge and innovation and policy and partnership work. By adapting to the drastically changed environment StAR moved its work online and strove to provide the best engagement under the circumstances.

18

countries received StAR assistance in 2020

4

countries adopted new laws or amendments related to asset recovery with StAR support

3

countries receiving StAR assistance opened at least one new AR case involving proceeds of corruption

2

countries adopted new domestic coordination mechanisms with StAR support

29

global policy events contributed to by StAR

11

countries received technical assistance on legislative reform

6

countries received StAR support to improve domestic coordination processes

6

countries received StAR support to improve international coordination processes

1.000+

people trained globally by StAR

8

in-person and virtual 'scoping missions' conducted in response to new requests

GLOBAL

The second edition of the Asset Recovery Handbook: A Guide for Practitioners was launched by StAR garnering over 16,000 downloads in the first two months

COSTA RICA

StAR presented on Organized Crime and Asset Recovery at the event to commemorate the 40th Anniversary of the Criminal Appeal Chamber of the Costa Rican Supreme Court of Justice

COLOMBIA

StAR organized a virtual roundtable to elaborate the National Plan of Action, including the national asset recovery strategy attended by the Secretary of Transparency, FIU, Ministry of Justice, Attorney General's Office, National Legal Defense and the General National Comptroller

UKRAINE

StAR provided comments on three pieces of legislation related to corruption and asset recovery, two of which were adopted by the government

INDIA

Over one month, StAR delivered 8 training sessions to over 40 prosecutors and law enforcement personnel on asset recovery, international cooperation and mutual legal assistance

GUINEA

The Court of Audit adopted and launched an asset declaration form incorporating the in-depth advice provided by StAR

ETHIOPIA

StAR supported the creation of the Directorate of Asset Recovery under the aegis of the Attorney General's Office

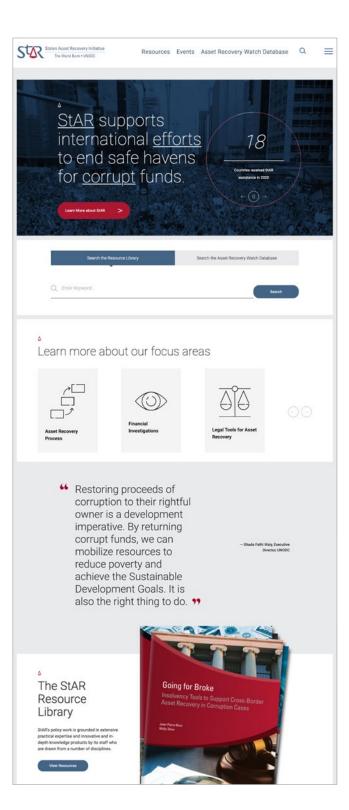
MONGOLIA

With StAR support and expertise, an asset recovery case made progress; domestic proceeds of crime were confiscated, and local authorities are working with the UK to recover illegal assets

SOUTH KOREA

StAR contributed to the 19th International Anti-Corruption Conference on multiple levels; as co-organizers, speakers, and panelists—though virtual, the event was originally planned to be held in South Korea

Launch of the New StAR Website

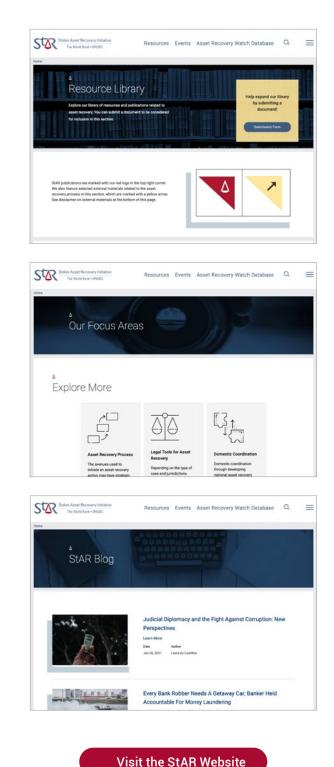


As we start the year toward recovery and rejuvenation; the StAR Initiative has also been working hard on a transformation of our digital platform. Heeding the invaluable advice and suggestions from many of our friends and partners, we have spent the past year designing and developing a new interface for our website which we hope provides a smoother user experience and easier access to materials related to the asset recovery process.

The new website has multiple new sections developed for better insight into StAR's mission, work and achievements, and sheds light on the different aspects of the asset recovery process. Our Focus Areas pages map out different steps in the asset recovery process and features relevant resource material. Going forward, we will keep adding and building out these pages to offer a clearer picture of the factors that matter most in making the return of proceeds of corruption, as envisaged under Chapter V of UNCAC, a reality.

A key feature of our new portal is the **StAR Resource Library**, a fast-growing repository of publications, both StAR publications and relevant external material from our partners and from multilateral workstreams such as the G20. This platform is designed to host resources and publications related to asset recovery, providing other agencies, organizations, and governments the opportunity to submit relevant knowledge products thus allowing asset practitioners from across the globe access to information in one place. This includes country-specific **Beneficial Ownership guides** and **Asset Recovery guides** (or guides to a country's mutual legal assistance framework) and a useful new **Glossary of Asset Recovery Terms**.

Through this website, we are also excited to provide our audience with information related to StAR's work, how we aim to make a difference, and what our counterparts and donors have to say about our technical support across the many topics related to asset recovery.



 If I had a dollar for every person, training course, or international event



where I had recommended that attendees visit the StAR Initiative website and read its excellent publications, I would be a wealthy person! Reading StAR publications was part of the induction reading list provided to all new enforcement staff in Jersey. For anyone struggling to afford expensive AML/CFT training everything you need to upskill can be found on the StAR website. **99**

 Barry Faudemer, Former Director of Enforcement, Jersey Financial Services Commission & Former Head, Jersey Financial Crime Unit

Country Engagements

Over the years, StAR has built a strong reputation across the globe for providing technical support to requesting countries across a spectrum of engagements ranging from assistance on legislative reform and capacity building, to facilitation with case management and inter-agency cooperation related to asset recovery efforts.

Legislative Assistance

In 2020, we provided technical assistance to 11 countries on proposed amendments and new drafts of bills () of which 4 were adopted (



ARMENIA

Submitted comments on the draft bill on Forfeiture of Illegal Acquired Property which came into law in May 2020

COLOMBIA

Provided feedback to the Secretary of Transparency on the Beneficial Ownership bill which is currently under review



ETHIOPIA

Assisted in drafting legislation on Non-Conviction based (NCB) asset forfeiture and the Whistleblower Award Act



GUINEA

Supplied in-depth advice on the asset declaration form which was adopted and launched by the Cour des Comptes



SUDAN

Reviewed and provided comments on several drafts of Sudan' law on fighting corruption and the recovery of public funds, especially sections on confiscations and competencies for asset recovery



UKRAINE

Aided in the reinstatement of the main pillars of the asset declaration system; provided advice on two drafts on strengthening the wording of false statement in asset declarations(one version was adopted, amendments to the first version pending), and submitted comments and discussed with authorities the draft legislation on civil recovery in foreign jurisdictions



Solution the support on the improvement of legislation related to asset recovery, particularly with regard to the Criminal Procedure Code and provided advice on all pillars of a new asset declaration regime





PAKISTAN

Provided advice to authorities on their proposals to improve company laws and implementing regulations and strengthening beneficial ownership transparency



UGANDA

Consulted with the Inspectorate of Government (IG) staff on the Online Asset Declaration System (ODS), electronic verification of asset declarations, and amendments to the legislative framework to strengthen disclosure systems



MOLDOVA

Provided recommendations and discussed with Moldovan authorities options for strengthening the effectiveness of the fight against high-level corruption by: focusing the jurisdiction of specialized prosecutor's office only on high-level corruption cases and increasing its independence



ECUADOR

Provided comments on the Non-Conviction based (NCB) Asset Forfeiture bill which was adopted by the National Assembly and is under review by the National Court

Building National Capacity

StAR adopted the use of multiple online platforms to facilitate the implementation of its capacity building courses during COVID-19. Despite the challenges arising from technological inefficiencies and time differences, the team successfully conducted 29 trainings; 23 through online workshops and webinars and 6 in-person sessions prior to the global lockdowns. The virtual trainings allowed the StAR team to engage multiple experts, and where possible, inviting regional jurisdictions to a joint workshop which would not have been logistically possible before.



AUSTRIA

A three-day course as part of the International Anti-Corruption Academy (IACA) Masters in Anti-Corruption Studies program



SOUTH KOREA

A briefing session in Washington, DC on StAR work and legal avenues on asset recovery for a group of prosecutors from South Korea



MONGOLIA

StAR completed a year of extensive trainings to enhance the capabilities of the Independent Authority against Corruption (IAAC), National Police Services, General Intelligence Agency and Prosecutors Office to investigate and prosecute corruption, money laundering and asset recovery cases. The in-depth courses covered financial investigations and strategies for prosecutors for international asset recovery.



UZBEKISTAN

A two-day training introducing participants to the core principles and modalities associated with financial investigations in particular, parallel investigations and working with a case management system

MALAYSIA



A two-day workshop on the use of open source information in investigations and an additional session on engaging private sector firms in asset recovery matters.

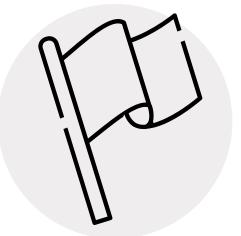


ZIMBABWE

Several workshops throughout the year on financial investigations, strategic support to progress asset recovery casework, and engagement with private sector firms

COSTA RICA

Separate trainings on money laundering, criminal liability of legal persons in the criminal investigation of corruption, asset recovery and the Spanish experience on non-conviction based forfeiture



ECUADOR

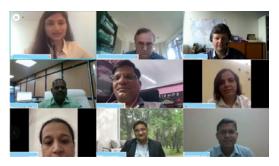
A series of webinars throughout the year with sessions on characteristics of financial offences and their investigation, non-conviction-based confiscation, international cooperation, financial and open source investigations, tax fraud and judicialization of information and probatory value. Given the virtual nature of the sessions, StAR was able to engage a wider panel of experts from the region, and garnered interest in the ongoing trainings from Argentina and from further national institutions, subsequently broadening and increasing the number of participants from 30 plus in the first webinars to more than 100 in the seventh webinar





INDIA

A workshop on asset recovery with a focus on international cooperation across one month which also provided the Directorate of Enforcement officials an opportunity to engage with experts on existing asset recovery cases





ETHIOPIA

A series of webinars for the newly created Directorate of Asset Recovery focusing on money laundering covering international standards, conventions, and Ethiopian proclamations

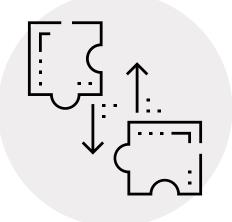
UKRAINE

Compiled a guide on using open sources in corruption investigations to assist Ukrainian authorities in effectively engage in international cooperation

Facilitating Domestic Cooperation

Possibly the most frequent obstacle to successful asset recovery is the inability of relevant agencies to cooperate domestically. Therefore, StAR assists requesting countries in developing a clear, well-defined structure to enable domestic cooperation, ensuring there is a lead agency, and that all agencies with relevant intelligence or evidence can share such information (under sufficient safeguards) and can cooperate operationally.

In 2020, StAR provided technical support to 6 countries to improve domestic coordination on asset recovery measures out of which 2 adopted new mechanisms to that end



MONGOLIA

The Operations Department of Independent Authority Against Corruption (IAAC) adopted the Case Management System (CMS) introduced through the StAR workshops and revised in accordance with the investigators' needs and specialties and has been found to be an effective method for coordinating their work with other local agencies

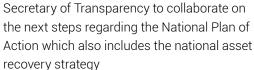
UZBEKISTAN



Provided input on draft regulations to improve financial investigations and relevant domestic coordination mechanisms

Shared case management materials to assist in better coordination in asset recovery cases

ROMANIA



Organized a virtual roundtable with the



ETHIOPIA

COLOMBIA

Facilitated the creation and staffing of the Directorate of Asset Recovery which will oversee coordinating asset recovery efforts in Ethiopia



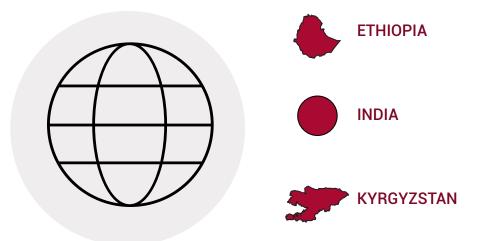
UKRAINE Discussed with ministers and officials from

the Prosecutor General's office (PGO) on the role of the PGO and asset recovery management agency and how they can work together more effectively

Case Support

Given the different legal frameworks and formal requirements of engagement for different jurisdictions, countries seeking assistance with asset recovery cases, confiscation and the ultimate return of stolen assets do not always have the technical expertise to engage with the relevant financial centers. Using the leverage of its partner organizations, StAR is uniquely situated to assist countries with international cooperation through establishing direct contact with relevant jurisdictions. Technical support in this area can range from informal introductions through bilateral side-meetings at global events opening the door for collaboration on asset recovery cases, to facilitating authorities of the requesting jurisdiction in formally engaging with foreign jurisdictions through the issuance of mutual legal assistance (MLA) requests. Last year, these efforts resulted in requesting law enforcement agencies successfully identifying stolen assets in foreign jurisdictions using various types of informal international cooperation in conjunction with formal requests. In 2020, StAR facilitated 6 countries with their efforts to progress international cooperation on existing asset recovery cases.





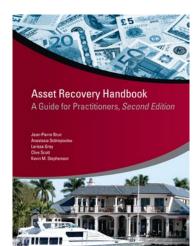
Knowledge & Innovation

In the StAR 2019 external review, the evaluators determined that "StAR's knowledge products and its unique ability to broker between countries or draw on the convening power of the World Bank and UNODC to organize country-specific or multi-jurisdictional 'asset recovery forums' are generally not duplicated by any other institution." StAR continues to make inroads in the development of useful publications, practical guides and manuals for asset recovery practitioners.

Launch of updated Asset **Recovery Handbook**

One of StAR's flagship publications is the Asset Recovery Handbook, a Guide for Practitioners first published in 2011 which serves as a reference guide to practitioners by describing approaches to recovering proceeds of corruption located in foreign jurisdictions. At the end of 2020, StAR published the Asset Recovery Handbook: A Guide for Practitioners, Second Edition. The handbook is designed as a how-to manual to guide practitioners as they navigate the strategic, organizational, investigative, and legal challenges of recovering stolen assets from safe havens and financial centers abroad. It provides common approaches to recovery of these assets from foreign jurisdictions, the challenges they are likely to encounter and introduces best practices. By consolidating into a single framework information that is dispersed across various professional backgrounds, the handbook has enhanced the effectiveness of practitioners and trainers working in a team environment. This updated version of the Handbook incorporates developments based on the experience collected in the past decade, including new legislation and case examples. This edition emphasizes the need to utilize innovative strategies and technical tools, including in the context of international cooperation.

The success of this StAR publication is evident not only in the over 250 participants who joined the launch event in December, but also in its meteoric rise to the 5th most popular publication of FMI-StAR in less than two months, with over 16,000 downloads.



Enhancing overnment Effectiveness and Transparency The Fight Against Corruption



World Bank global report on anti-corruption

Last year, StAR experts also contributed significantly to the World Bank's anti-corruption report titled Enhancing Government Effectiveness and **Transparency: The Fight Against Corruption**. StAR contributed both to the peer review and the substance

of the report, notably on financial disclosure and beneficial ownership. The asset and interest declaration chapter provides substantive feedback on best practices and guidelines for practitioners seeking to implement effective and transparent declaration systems.

The chapter on beneficial ownership transparency in the report provides an introduction to the concept, describes different approaches to collecting and maintaining information, and charts growing commitments by governments towards beneficial ownership transparency.

Both chapters offer case studies to illustrate the impact of asset declaration systems, and the challenges governments face in achieving greater transparency on beneficial ownership of companies and other legal persons, respectively.

UNODC's e-learning portal has numerous courses on different topics such as transnational organized crime, illicit drugs, cybercrime and anti-corruption to name a few. Courses are developed by experts in the relevant fields in order to assist law enforcement officers and practitioners to build their knowledge base and stay updated. Last year, the StAR team contributed to the development of the Asset Recovery module under the course titled Introduction to Anti-Corruption.



ENHANCING GOVERNMENT EFFECTIVENESS & TRANSPARENCY: THE FIGHT AGAINST CORRUPTION

Ghada Waly, Executive Director of the United Nations Office on Drugs and Crime (UNODC) at the online launch of World Bank Anti-Corruption Report, September 2020

Forthcoming Publications

StAR will be publishing on the direct enforcement of foreign confiscation orders. The study focuses on 31 jurisdictions selected in order to ensure balanced geographical distribution (different UN Regional Groups) and representation of different legal systems (civil law/ common law/ mixed systems). In June, an online multi-jurisdiction expert group meeting was organized to discuss the draft study where 36 experts from 21 jurisdictions participated in the discussion and highlighted existing good practices and challenges in this area. Experts joined from Brazil, Australia, Nigeria, Kazakhstan, India and the United States, to name a few, and the group represented various agencies such as the Prosecutor General's Office, Police, Department of Justice and the Ministry of Foreign Affairs. The objective of the study is to offer an in-depth analysis of the "direct enforcement" notion, existing legal approaches and related challenges and provide practical recommendations. It is addressed to a broad range of law enforcement, justice and asset recovery practitioners as well as bodies involved in legislative and regulatory processes.

Throughout 2020, StAR has also collected responses from country authorities on their efforts to freeze, confiscate, and return proceeds of corruption in response to our call to collect new data to quantitatively map corruption-related international asset recovery, detailed in the 2019 Annual Report. Despite interruptions and significant delays due to the pandemic, we received a remarkable response rate from over 70 jurisdictions and decided to extend the timeline for the collection of information. Preliminary findings were presented at the UNCAC Asset Recovery Working Group (ARWG) in November 2020 and are preparing a report on the subject.

In addition, there is ongoing research for reports on benefits and challenges of automation of asset declaration verification, and a report together with the IBA on the role and standing of corruption victims in proceedings and how to determine damages amongst others. Our team is also working with the Camden Asset Recovery Interagency Network (CARIN) on a guide for investigating wealth and contributing to a policy paper about related party transactions. StAR is working on a paper on issues linked to legal professional privilege and how it affects investigators' ability to ascertain beneficial ownership and discusses measures to prevent the abuse of legal privilege.

66 StAR has been quite supportive of our work in the MANTRA project. They have put



us in high level panel discussions on asset recovery in Vienna, Paris, Washington DC, and Addis Ababa to share our experiences and success stories in the Monitoring the Management of Returned Assets through Transparency and Accountability (MANTRA) project. Additionally, the StAR website is quite rich on asset recovery information and knowledge products which has been quite helpful for our work in Nigeria. 🂔

- Rev David Ugolor, Executive Director, Africa Network for Environment and Economic Justice (ANEEJ), Nigeria

• The continued collaboration with the StAR initiative has been instrumental in building an effective Asset Recovery effort within the Attorney General's Office of Ethiopia... The StAR Initiative delivered a series of virtual workshops over several weeks in the Spring and Summer of 2020 on money laundering investigation and prosecution. In addition, the StAR consultant has provided on-going assistance on various structural, operational and legal issues as we continue to develop our program and the legal framework within which we operate. Our office looks forward to continued capacity building assistance from the StAR initiative.

- Alemante Agidew Wondimeneh, Director General, Asset Recovery Directorate, Ethiopia



•• The fact that the training not only addressed the procedural and legal issues related to current approaches of asset recovery and information exchange but also dealt in detail with alternate approaches to asset recovery and informal channels of information exchange, has led to significant value addition in the skills and resources of the officers who participated in the training. The Directorate of Enforcement appreciates the efforts undertaken by the StAR Initiative team and hope for similar assistance and support in future. **99** - Directorate of Enforcement. India

• Thanks to [StAR's] training courses, local authorities and its officers have



developed the same knowledge and understandings on financial crimes and its investigation. Therefore, it is fair to say that interagency network and cooperation have effectively improved in the fight against financial crimes. **??**

- Dashdavaa Zandraa, Director, Commissioner General, Independent Authority Against Corruption in Mongolia (IAAC)

66 StAR builds bridgeswe bring together governments from financial centers



and from countries harmed by corruption, global institutions and other partners to forge a path towards returning stolen assets, as envisaged in the UN Convention against Corruption.

- Ghada Fathi Waly, Executive Director, UNODC

Policy & Partnerships

In the last years more fora are addressing issues related to asset recovery. The OECD, ADB, the Financial Action Task Force, and the G20 have all increased their efforts in this field. This shows an increased awareness about the importance of the issue at the policy level. StAR is a unique actor in this field, due to its nature (an effort of two credible international institutions) and its scope: with an international reach, its capacity to leverage, connect and facilitate cooperation between high level stakeholders. StAR seeks to influence the policy debate on asset recovery through provision of the 'hard facts' on actual progress, assisting and monitoring the development of relevant international standards, determining existing gaps and ensuring that asset recovery and anti-corruption remain a priority at relevant international fora.

UNCAC and UN-Related

StAR participated in the Eleventh session of the Implementation Review Group (IRG) of UNCAC which, though virtual, had over 400 participants and was conducted in 6 languages. The IRG meetings focused on beginning the 5th year of UNCAC reviews, which also include the asset recovery chapter.

At the fourteenth session of the UNCAC Open-ended Intergovernmental Working Group on Asset Recovery (ARWG), StAR presented to the delegations on the responses received from country authorities to our data collection effort on international asset recovery in corruption cases and briefed members on StAR's notable engagements over the past year. In addition, team members contributed to the dialogue and outcomes at the following events:

- Attended multiple intersessional meetings in preparation of the United Nations General Assembly Special Session (UNGASS) which concentrated on prevention, criminalization and law enforcement as thematic areas. Being part of these meetings allows representatives to propose specific topics to be discussed and added to the agenda of the forthcoming UNGASS.
- Presented on international standards in beneficial ownership transparency and its positive impacts on business and investment at a webinar series organized by the UNODC and KPK (Indonesia's Anti-Corruption Agency)



StAR presenting on the data collection effort on asset recovery to the Open-ended Intergovernmental Working Group on Asset Recovery (ARWG), November 2020

- Conducted a presentation on asset recovery and the importance of private sector entities, such as financial institutions, in preventing, detecting and prosecuting actors involved in corrupt practices at the United Nations Global Compact (UNGC) Leaders' Summit.
- The event provided access to over 20,000 participants from around the world and the UNODC Executive Director highlighted StAR's work with the International Bar Association (IBA) and Partnering Against Corruption Initiative (PACI) as an example of strategic cooperation between the UN and the private sector



StAR presenting to the UN FACTI panel, May 2020

Participated at the UN FACTI panel (High Level Panel on International Financial Accountability, Transparency and Integrity for Achieving the 2030 Agenda) by presenting on the priorities for improving international cooperation on asset recovery and return

Inter-Agency Networks

StAR is also involved with the Asset Recovery Interagency Networks and multiple practitioners' networks in order to facilitate overcoming challenges related to international cooperation in asset recovery. Our team participated in the Asset Recovery Inter-Agency Network (ARIN) and Camden Asset Recovery Inter-Agency Network (CARIN) Steering Group meetings to update members on StAR's work and follow up on data collection efforts. We also announced the StAR Best Case Award which will be awarded to the FIU of Indonesia at the next Egmont Group Plenary.

Financial Action Task Force (FATF) **Recommendation 24**

Finding the beneficial owner of a corporate entity that owns an asset is often the first step in an investigation into proceeds of corruption. For the first time since 2012. the Financial Action Task Force (FATF) is reviewing its influential global standard on



beneficial ownership transparency of legal persons, FATF Recommendation 24. The FATF Standard on beneficial ownership has been adopted by the Global Forum on Tax Transparency and transposed into national laws and regulations around the world. A project group of FATF members and observers was formed in the spring of 2020 to review R.24 and propose revisions to address weaknesses in its implementation and lower risks of criminal abuse of legal persons. StAR has played an active role in the discussions: chairing of a subgroup on obstacles to transparency, advocating for stronger controls against abuse of nominees and bearer shares, and contributing drafting suggestions for potential amendments. Among the focus areas of the review of the standard are: verification of beneficial ownership information supplied by legal entities, strengthening controls against abuse of nominee relationships and bearer shares, improving cross-border information sharing of beneficial ownership information, simplifying options for collection mechanisms for beneficial ownership information (and requiring countries to use more than one option), strengthening risk awareness of risks related to foreign legal entities.

Global and Regional Multilateral Organizations

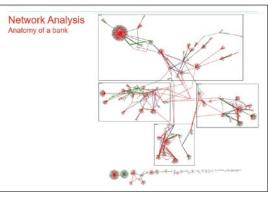
In conjunction with the strong presence of StAR at UN and UNCAC-related events which inform international standards for anti-corruption and asset recovery, and its engagement with inter-agency networks which seek to enhance coordination and implementation of best practices at a regional level, StAR team members are routinely invited to global events hosted by multilateral organizations and civil society to provide their technical expertise on matters related to asset recovery. Last year, StAR sought to highlight the importance of action on beneficial ownership transparency, the role of gatekeepers, the control of money laundering, global trends in asset declarations and conflict of interest, illicit financial flows and legal privilege among other topics, at the following events:



Illicit Financial Flows and Sustainable Development Forum. September 2020

- Expert group meeting at the **Organization of American** States (OAS)
- Conflict of interest and asset declarations in Eastern Euprope and Central Asia organized by OECD
- Illicit Financial Flows (IFF) and Sustainable Development Forum organized by GIZ and Norad
- Tax Transparency and Corruption Conference organized by the Institute for Austrian and International Tax Law of the Vienna University of Economics and Business, in association with the World Bank Group and the African Tax Institute
- Presented on Organized Crime and Asset Recovery at the event to commemorate the **40th Anniversary of the** Criminal Appeal Chamber of the Costa Rican Supreme Court of Justice
- On-going contributions to and supporting a cross-sectoral taskforce of industry leaders addressing the role of gatekeepers in preventing corruption and financial crime and aiming to provide a set of practices and policies for private sector firms convened by the **World Economic** Forum Partnering Against Corruption Initiative (PACI) and Global Future Council (GFC) on Transparency and Anti-Corruption.
- Joined the G20 Anti-corruption Working Group (ACWG) meetings at which a consensus was reached to create the Global Operational Network of Anti-Corruption Law Enforcement Authorities (GLOBE). StAR contributed to a scoping paper on international cooperation dealing with economic crimes, offenders and asset recovery, and will contribute to GLOBE through the compilation of resources and practical assistance on fostering international cooperation between stakeholders

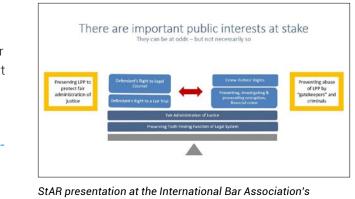
At the 19th International Anti-Corruption Conference StAR played an important role on multiple levels. StAR co-sponsored a panel with the World Economic Forum's Partnering Against Corruption Initiative (PACI) and Global Future Council on Transparency and Anti-Corruption titled: Enlisting Gatekeepers in the Fight Against Corruption – Where Do We Go From Here? The discussion focused on the challenges faced by professional intermediaries, and best practices required to prevent or interrupt illicit flows. In addition, the StAR team was part of the panels, Transnational Aspects of Corruption: The Way Forward, looking at corruption in the global context and how to prevent large financial centers from providing safe havens for illicit funds; and Taking it Back: Making Asset Recovery Work, focused on the importance of returning proceeds of corruption and the proper management of stolen assets.



Kroll's presentation on beneficial ownership

In collaboration with the World Bank's Community of Practice for Anti-Corruption, StAR organized a well-attended virtual Brown Bag Lunch event titled Follow the Money: Exposing Real Beneficial **Ownership**. During the session, investigators from Kroll presented case studies from their international bank fraud and money laundering investigations to demonstrate how professional money laundering networks take advantage of opacity in corporate beneficial ownership requirements. The session also covered how banks and government agencies can harness existing transaction data and bank information to spot anomalies in beneficial ownership declarations and to identify the real beneficiaries of money launderina schemes.

Presented on the risks of abuse of legal privilege/ confidentiality of the legal profession from an anti-corruption/AML/financial crime perspective in a panel discussion on privilege and confidentiality at the International Bar Association's "Virtually Together" conference



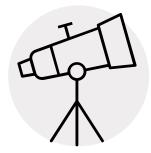


'Virtually Together' conference, November 2020, on legal privilege and beneficial ownership

StAR Events

Looking Ahead

Management, Staffing & Funding



In StAR's external review conducted in 2019, it was recognized that StAR's strategic relevance "will remain relevant in a world of evolving technologies, document dumps, and increased global attention to corruption." Based on the evaluation recommendations and StAR's vision for the next five years, we will shift our focus according to the needs of the time.

StAR will expand its work with financial centers, including on promoting effectiveness of beneficial ownership transparency and combatting misuse of corporate structures to hide stolen assets, alongside its ongoing work on building capacity to pursue the return of proceeds of corruption to emerging markets and developing countries. StAR will additionally focus on new challenges related to asset recovery including illicit financial flows (IFFs). This strategic shift is closely aligned with the World Bank's increased emphasis on combatting IFFs and UN initiatives such as the new High-level Panel on International Financial Accountability, Transparency and Integrity (FACTI), and also offers opportunities to collaborate with new partners.



114,277 page views

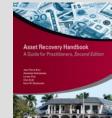
10.578 file downloads

68.092 unique visitors

Top 5 countries

- United States
- United Kingdom
- India
- France
- Germany







1.273 unique visitors in December

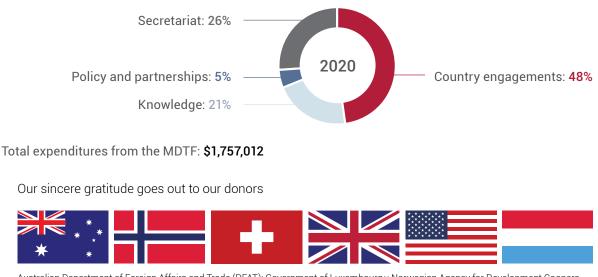
Twitter 2020 statistics

activities, on illicit financial flows, and on UNODC's work The StAR Secretariat is based in the Financial Stability and Integrity Global Practice of the World Bank and comprised on the UNCAC Implementation Review Mechanism and of World Bank and UNODC staff and consultants. technical assistance activities. The StAR Management The StAR program relies on the expertise of an interna-Committee provides overall guidance to the StAR team tional team of professional and support staff based in its and its work. It is chaired by the Global Director of the Secretariat in Washington DC, at UNODC's Corruption and Practice Group that hosts StAR and includes members Economic Crime Branch in Vienna, and the UNODC field from the World Bank and UNODC. StAR also works closely office in Bogota, as well as expert consultants worldwide. with its Donor Consultative Group and reaches a wide StAR team members work on a full or part time basis on audience through its StAR Quarterly Newsletter, available StAR activities, as well as on the World Bank's AML/CFT on its website.

Funding

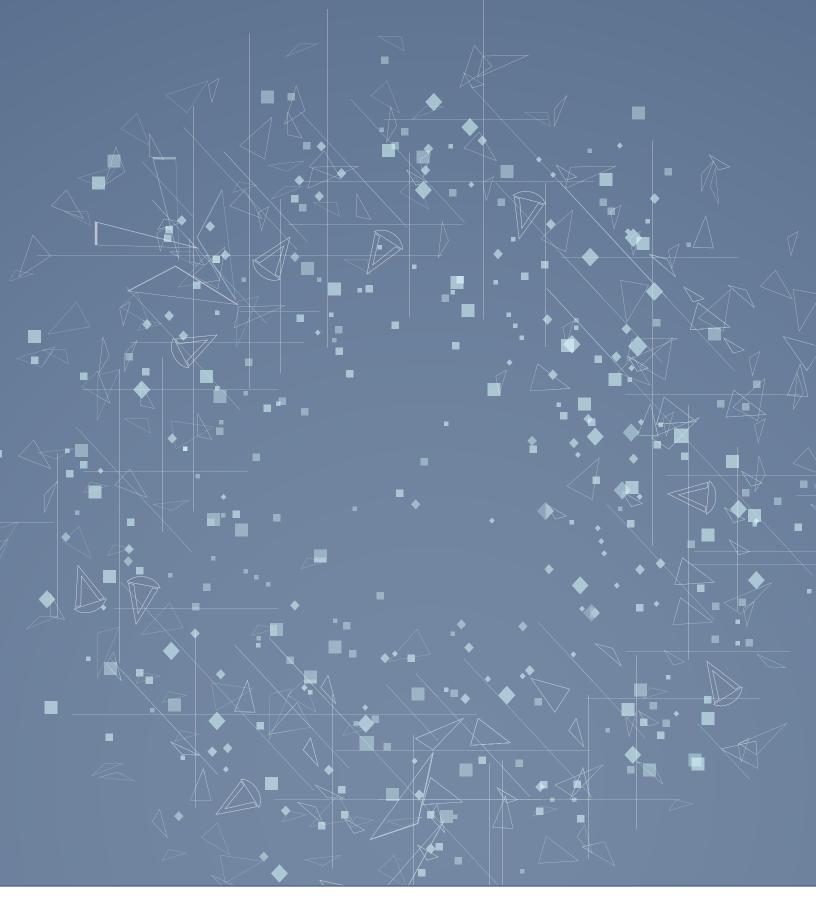
StAR's funding derives from the Multi Donor Trust Fund (MDTF) and from the World Bank global engagement budget. The MDTF covers a portion of fixed costs and a range of variable costs which includes activities, travel, staff time and consultants, and production of StAR material. There is also a separate project budget for UNODC's contribution to the work of StAR which covers the costs of seconded UNODC staff, other UNODC staff time and selected activities. In 2020, the MDTF had contributions from Australia, Switzerland and the UK (DFID and FCO), while Luxembourg, Norway (NORAD) and the US contributed the UNODC budget for StAR activities.

Disbursement Breakdown per Work Pillar



Australian Department of Foreign Affairs and Trade (DFAT); Government of Luxembourg*; Norwegian Agency for Development Cooperation (Norad)*; Swiss Agency for Development and Cooperation (SDC); UK Foreign, Commonwealth and Development Office (FCDO); U.S. State Department Bureau of Narcotics and Law Enforcement Affairs (INL)* *Contribution only through UNODC







Stolen Asset Recovery Initiative

The World Bank • UNODC

star.worldbank.org @returningassets

