



STABSSTELLE FINANCIAL  
INTELLIGENCE UNIT  
FÜRSTENTUM LIECHTENSTEIN



# Strategy of the Financial Intelligence Unit

for the years 2026–2029

22 April 2026

**“If you don’t know where you are going, you will probably end up someplace else.”  
(Laurence J. Peter)**

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# 25 Years of the Financial Intelligence Unit

## Evolving with the times

### A brief look back – a big step forward

The Financial Intelligence Unit (FIU) was established on 1 March 2001 and has since served as the central reporting office for combating money laundering, predicate offences to money laundering, organised crime, and terrorist financing in Liechtenstein. In 2009, the FIU's mandate was significantly expanded to include enforcement tasks relating to the implementation of international sanctions under the International Sanctions Act (ISG)<sup>1</sup> as well as the War Material Act (KMG)<sup>2</sup> and the Nuclear Energy Goods Control Act (KEGKG)<sup>3</sup>. Over the past 25 years, the FIU has continuously adapted to the increasingly complex challenges of a globalised financial world and to its evolving responsibilities arising from geopolitical developments.

### The need for a strategy in a constantly changing world

Against the backdrop of rapidly evolving global financial crime and the strategic challenges of the international environment, it is essential for us to position the FIU in a goal-oriented and future-proof manner. For this reason, we have developed an FIU Strategy for the first time, aimed at establishing ourselves as a modern, high-performing authority that plays a leading role in combating financial crime at both the national and international level. As a service provider for the Liechtenstein financial centre, we are committed to taking responsibility. In doing so, we rely on transparency, innovation, and progressive working methods.

Today, we are not only looking back on the past 25 years, but also setting the course for the future.

### A quarter of a century in review: our journey and achievements

#### A turning point for the Liechtenstein financial centre

The year 2000 put the Liechtenstein financial centre to the test: due to insufficient measures to combat money laundering, the country was placed on the "blacklist" of the Financial Action Task Force (FATF)<sup>4</sup> for non-cooperative jurisdictions. This decision prompted an immediate strategic reorientation of Liechtenstein's approach to combating financial crime, which included the establishment of the FIU in accordance with international standards. That same year, the Liechtenstein FIU joined the Egmont Group of Financial Intelligence Units, the global association that today comprises 182 FIUs. This swift response and the consistent implementation of further immediate measures were instrumental in restoring international confidence, and already in 2001 Liechtenstein was removed from the FATF "blacklist". This success laid the foundation for the ongoing development of the Liechtenstein financial centre as a globally recognised and reputable financial hub.

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<sup>1</sup> Law on the Enforcement of International Sanctions (International Sanctions Act; ISG)

<sup>2</sup> Law on the Brokering of and Trade in War Material (War Material Act; KMG)

<sup>3</sup> Law on the Brokering of and Trade in Nuclear Goods, Radioactive Waste, Dual-Use Goods and Special Military Goods (Nuclear Energy Goods Control Act; KEGKG)

<sup>4</sup> <https://www.fatf-gafi.org/>

## **Transformations and challenges**

Over the past 25 years, we have repeatedly risen to new challenges. Key events such as the terrorist attacks of 11 September 2001, the global financial crises, data leaks (e.g. the Panama Papers), technological innovations, and geopolitical tensions have required continuous adaptation to evolving international standards.

Over the years, we have continuously adapted our structures and processes at the FIU and have grown significantly in the process, in order to meet ever-changing challenges. Since 2019 in particular, we have seen a marked increase in reports of suspicion and sanctions-related reports, driven in part by the growing use of digital assets and associated services, expanded definitions of criminal offences, and geopolitical shifts. The enforcement of international sanctions has steadily gained in importance since the Arab Spring of 2010 and was further intensified in 2022 by Russia's invasion of Ukraine. These geopolitical developments have fundamentally altered the global landscape and, with it, significantly shaped our work.

## **From a small reporting office to a globally networked authority**

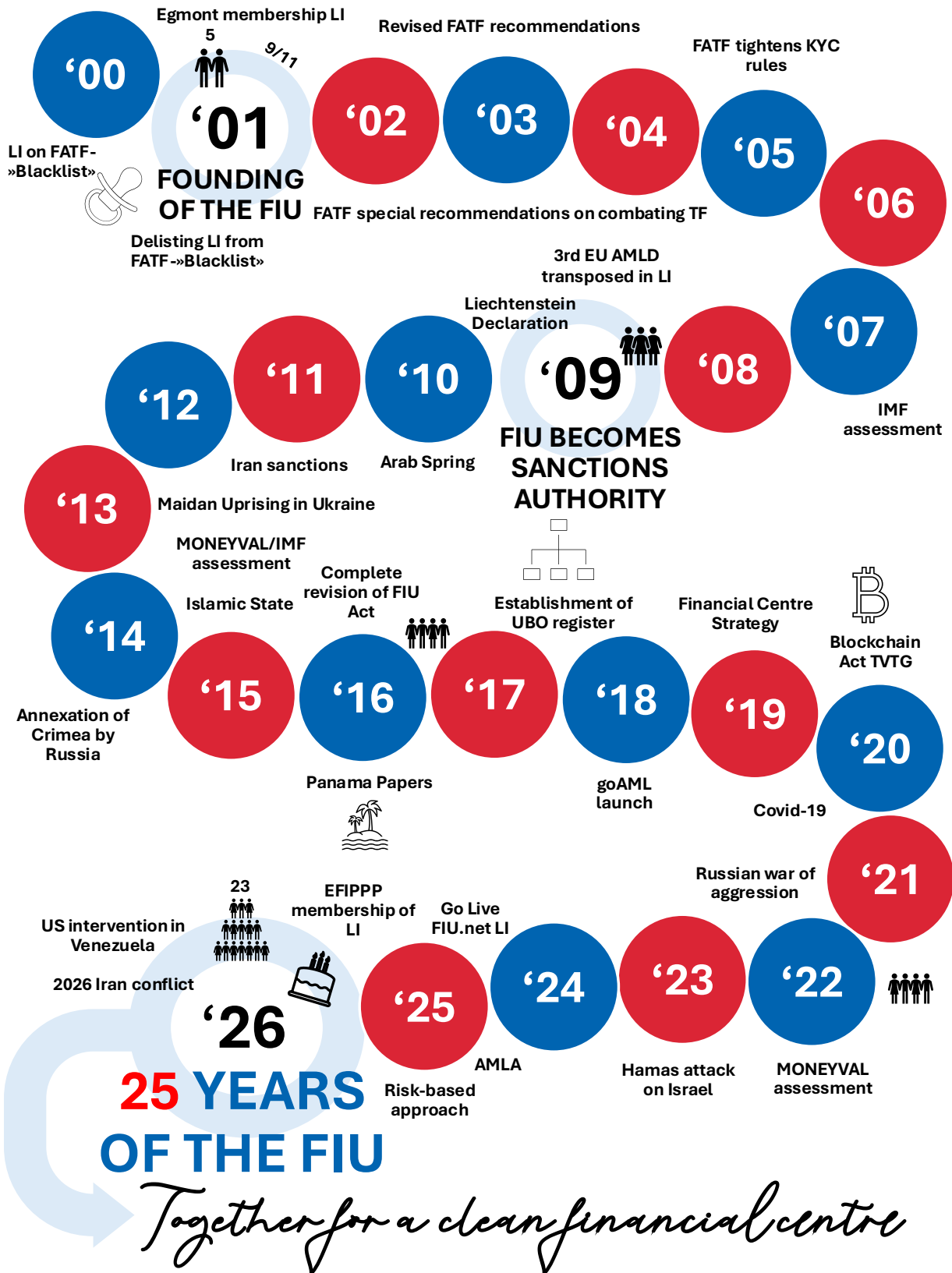
What once began as a small reporting office is today a highly specialised and internationally networked analytical and sanctions enforcement authority. The increasing scope of our responsibilities and the challenges we face have not only driven our growth, but have also significantly changed the profile and requirements of our team. Through our contribution to uncovering illicit financial flows, combating criminal networks, and protecting the financial system from destabilisation, we have become an indispensable institution for national security. In addition, in our role as sanctions enforcement authority, we strengthen the country's economic security and the rule of law.

## **A new era under new leadership**

Since May 2025, under the leadership of Bianca Hennig, we have been shaping the future of the FIU in a modern, global, and forward-looking way. Together as a strong team, we are taking key steps to advance its continued development.

# EVOLVING WITH THE TIMES

## 25 YEARS OF THE FIU LIECHTENSTEIN



# Mission of the Financial Intelligence Unit

## Together for a clean financial centre

### What is our mandate?

The FIU is Liechtenstein's central reporting office for indications of money laundering, predicate offences to money laundering, organised crime, and terrorist financing. Our core task is to collect, analyse, and assess information in cases of suspected money laundering, serious criminal offences, terrorist financing, and the financing of weapons of mass destruction (proliferation financing).

In addition, we are entrusted with extensive enforcement tasks in the area of international sanctions, under the War Material Act with regard to the brokering of and trade in war material and related technologies, and under the Nuclear Energy Goods Control Act with regard to the brokering of and trade in nuclear goods, radioactive waste, dual-use goods with both civilian and military applications, and special military goods.

We carry out our responsibilities independently and on the basis of international standards as transposed into national law. We are not part of the law enforcement authorities.

### How do we fulfil our mandate?

To fulfil our legislative mandate, we collect, analyse, and assess relevant information. This information comes in particular from reports of suspicion filed by persons subject to due diligence and sanctions-related reports from persons required to report, from national authorities and whistleblowers, from public and non-public databases, and from foreign FIUs and other sanctions enforcement authorities. In addition, we analyse suspected cases that, on the basis of publicly available information, have a potential nexus to Liechtenstein.

In accordance with international FIU standards, our analytical work is divided into operational analysis, which focuses on individual cases, and strategic analysis, which examines patterns and trends on a consolidated basis. In this context, "intelligence" refers to the collection, analysis, and assessment of information that provides indications of illegal activity and helps to identify risks or suspected cases and to take informed decisions.

Our operational case analyses provide structured and processed information on suspected cases, enabling law enforcement authorities to initiate targeted and timely investigations. We also prepare analysis reports for other Liechtenstein authorities. When processing information, we apply risk-based criteria to prioritise our work. Within the framework of the applicable legislation, we exchange information not only with national authorities, but also with partner FIUs and other sanctions enforcement authorities. The protection of our sources is our highest priority and is consistently ensured.

Our strategic analyses contribute to strengthening the national prevention system and thereby enhance the resilience of the financial centre. On the basis of consolidated data, we prepare risk reports for various target audiences, including policymakers and the private sector.

## Who do we work with?

Our national stakeholders include, in particular, policymakers, authorities, and business associations. Those required to file reports include all persons subject to due diligence and national authorities under the Due Diligence Act.<sup>5</sup> In addition to traditional financial intermediaries, persons required to report under the International Sanctions Act also include actors from the industrial and services sectors who are subject to sanctions or goods control provisions. Our partners include foreign FIUs and the competent foreign sanctions enforcement authorities.

## How do we contribute to legislation and policymaking?

We support the Government and lawmakers in drafting and developing laws and ordinances as well as in implementing international standards. We prepare drafts for regulatory projects, such as the FIU Act<sup>6</sup> and parts of the Due Diligence Act, thereby making a significant contribution to the ongoing development of Liechtenstein's legal framework. We also issue recommendations to the Government on proceedings relating to the enforcement of international sanctions, the War Material Act, and the Nuclear Energy Goods Control Act.

## What is our contribution to the security and integrity of the financial centre?

We play a central role in protecting the integrity and reputation of the Liechtenstein financial centre. Through our analysis reports, we provide crucial indications of potential financial crime, enabling law enforcement authorities to initiate targeted investigations and take effective measures. We also raise awareness among persons required to file reports and promote the early detection of money laundering, financing of terrorism or proliferation, and sanctions violations. At the international level, we cooperate with our partners and actively engage in specialist committees and working groups. Through this cooperation, we make a significant contribution to the further development of common standards and strengthen international cooperation in the fight against financial crime.

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<sup>5</sup> Law on Professional Due Diligence for the Prevention of Money Laundering, Organised Crime and Financing of Terrorism (Due Diligence Act; SPG)

<sup>6</sup> Law on the Financial Intelligence Unit (FIU Act; FIUG)

# Vision of the Financial Intelligence Unit

**Shared values.**

**Clear priorities.**

**A strong contribution to a clean financial centre.**

## **We safeguard the integrity and reputation of the Liechtenstein financial centre**

We act in a goal-oriented, reliable manner and with a high level of professional expertise. We make a lasting contribution to a Liechtenstein financial centre that is characterised by integrity, security, and stability. Through forward-looking and effective analytical work, we prevent criminal actors from exploiting the Liechtenstein financial centre for their purposes and thereby jeopardising its success or reputation. In this way, in the interest of the public welfare, we safeguard the confidence of clients and the international community in the financial centre, promote its international recognition and resilience, and ensure stable and reliable economic conditions.

## **We take responsibility for security**

We make a crucial contribution to national and international security by detecting illicit financial flows at an early stage and consistently disrupting them. Through targeted analyses, we uncover criminal networks and prevent them from abusing or infiltrating our financial system. In close cooperation with national authorities and international partners, we identify risks proactively and successfully combat financial crime across borders. We reliably enforce international sanctions in order to promote geopolitical stability and ensure compliance with international rules. In doing so, we bolster the economic stability and credibility of Liechtenstein as a financial and business centre.

## **We lead the way in the prevention of financial crime**

We rank among the most advanced and committed specialist authorities worldwide in the prevention of money laundering, its predicate offences, terrorist and proliferation financing, and violations of international sanctions. We distinguish ourselves through up-to-date and well-founded expertise and strong analytical capabilities, combined with an active role on the international stage. Through our work, we contribute to ensuring that both the FIU and the Liechtenstein financial centre enjoy international visibility, recognition, and esteem.

## **We fulfil our enforcement tasks under the ISG, KMG, and KEGKG in a targeted manner**

With our comprehensive expertise, many years of experience, and the necessary resources, we carry out the demanding enforcement tasks under the ISG, KMG, and KEGKG. We remain continuously informed about geopolitical developments and national threats relating to international sanctions. On this basis, we take targeted measures at an early stage to minimise risks and safeguard the integrity of the financial centre. Our stakeholders and partners can rely on transparent and timely communication. We are present and prepared to take swift and well-founded decisions.

## **We embrace digital, automated, and future-oriented processes and technologies**

We are fully digitalised and use modern, automated, and intelligent analytical tools to evaluate even large volumes of data in a structured, precise, and timely manner. This enables us to detect risks at an early stage, take informed decisions, and raise awareness in the financial centre in good time. We implement digitalisation responsibly. Data security is our highest priority. Also in the area of IT, we ensure our independence and autonomy. Within the international FIU community, we are one of the leaders in technology. This pioneering role strengthens our position

as an innovative and reliable partner and contributes to the international visibility and recognition of the professionalism of the Liechtenstein financial centre.

### **We set priorities that make a difference**

We work in a structured and effective manner by applying defined processes and giving our team members the latitude they need to take decisions independently. Through a consistent, risk-based focus on our core tasks and a clear delineation from supplementary activities, we deploy our resources in a targeted manner where they are most needed and yield the greatest benefit. We develop practical solutions, identify regulatory or operational needs for action at an early stage, and initiate the necessary adjustments. In working with our stakeholders, we earn trust through objectivity, openness to dialogue, and transparency. In doing so, we uphold official secrecy and our independence. We attach great importance to a relationship of trust and constructive cooperation, both with our partners and stakeholders and with persons required to file reports.

### **We put team spirit and dedication into practice**

Our team cultivates this shared vision of mutual trust and an open culture of communication. We are passionate about our mission and foster a positive working environment. We ensure our long-term performance by encouraging a high level of commitment and maintaining a healthy work-life balance. Our leadership culture places appreciation, open communication, and personal responsibility at its core. Our strong team cohesion is built on respect, reliability, and mutual support. We create conditions that enable responsible, high-quality work and provide scope for individual initiative. We pursue continuous professional development and constantly strengthen our competencies. We make targeted use of our diverse strengths and remain curious and open-minded.

# Strategic Goals of the Financial Intelligence Unit

## for the years 2026–2029

### I. Building trust by shaping how we are perceived

#### Background

The FIU performs key tasks in protecting the country and the Liechtenstein financial centre. The specific nature of its dual role – as a traditional FIU on the one hand and as an enforcement authority in the areas of the ISG, KMG, and KEGKG on the other – is not yet fully known to many stakeholders. Various stakeholders have repeatedly expressed a desire to intensify interaction, improve communication structures, and expand professional exchanges. The FIU intends to increase its visibility over the long term and to raise awareness of its role among the relevant stakeholders.

#### A focus on communication: greater visibility, dialogue, and trust

**We strengthen trust in the FIU as a service-oriented and visible institution that, through a professional public profile, effective communication channels, and targeted exchange formats, raises awareness of its valuable contribution to the security of Liechtenstein.**

### II. Further development as a traditional FIU and enforcement authority

#### Background

The FIU brings two key institutional functions together under one roof: that of a traditional FIU in accordance with international standards on the one hand, and that of an enforcement authority for the areas covered by the ISG, KMG, and KEGKG on the other. Both functions are equally central to the security of Liechtenstein. The combination of these two roles creates valuable synergies, but also entails demanding requirements in terms of personnel and organisation. In certain areas, there is potential for optimisation and further development. The FIU intends to accord the same strategic priority to all the tasks entrusted to it and to ensure that the FIU operates as a unified entity. The aim is to carry out both areas of responsibility in a functional and effective manner.

#### The FIU in balance: high performance in both institutional roles

**We carry out our dual role as a traditional FIU and as an enforcement authority under the ISG, KMG, and KEGKG in a balanced manner. We leverage synergies, ensure the necessary functional separations, and optimise our personnel and organisational structures so that both institutional functions are adequately fulfilled.**

### III. Security through networks: strong partnerships for analysis and enforcement

#### Background

International financial centres depend on the close integration of their authorities into national and international cooperation networks. Only through the continuous cultivation and further development of these partnerships can global financial flows, increasing security requirements, and growing regulatory complexity be effectively addressed. Liechtenstein shares the situation typical of an internationally oriented financial centre, in that the vast majority of predicate offences to money laundering are committed abroad. Information from foreign authorities is therefore essential in order to uncover relevant links to potentially incriminated domestic assets and to detect and effectively counter abuse at an early stage. The FIU is regarded internationally as a reliable and professionally operating partner, which is among its key strengths. The FIU intends to further expand both its national and international networks and visibility.

#### Security requires networks: national, European, and global

**Our national and international networks are sustainably strengthened and institutionally anchored in both of our institutional roles. We maintain robust cooperative relationships with domestic authorities as well as with FIUs and sanctions authorities in Europe, major global financial centres, and like-minded states. We actively contribute to the Anti-Money Laundering Authority (AMLA) and help shape international standards. This reliable cooperation enhances the quality and speed of our analyses and increases the effectiveness of our work.**

### IV. Digital future: setting the course for a modern, high-performing IT infrastructure

#### Background

Since the introduction of the goAML reporting platform in 2018, the FIU has been continuously digitalising its processes. However, missing interfaces and rapidly growing volumes of data are increasingly leading to delays, quality risks, and inefficient workflows. The FIU intends to expand its technical capacities with modern analytical tools and to establish connections to relevant data sources, in order to sustainably increase the productivity and quality of its analyses and to remain competitive in the national and international environment.

#### Future-proof IT: precise analyses, early risk detection, and high productivity

**We have a modern, high-performing, and AI-supported IT system landscape that automatically ingests, processes, and analyses data through defined workflows. This improves data quality, enables earlier risk detection, and accelerates the flow of information. At the same time, we ensure that we remain independent both operationally and technologically.**

## V. Focus on expert competencies and prioritisation

### Background

New developments in the area of financial services and constantly evolving money laundering methods are accompanied by increasing risks of abuse, to which Liechtenstein is also exposed. To effectively counter these risks, what is needed on the one hand is a deepening of the FIU's professional expertise and a clear strategic focus on complex, cross-border cases that pose significant risks to the financial centre, the country, and its reputation. On the other hand, strategic analysis needs to be further developed and strengthened. The risk-based approach, introduced into law in 2025, represents an internationally recognised instrument for the prioritisation and allocation of resources at the FIU and must be continuously expanded. The FIU intends to deepen its professional expertise, strengthen its strategic analysis, and further develop the risk-based approach.

### Impact through focus: stronger risk orientation and targeted expansion of competencies

**We possess comprehensive expertise in the areas of crypto and payment services as well as terrorist and proliferation financing. A risk-based approach has been developed, implemented, and embedded in our analytical work. Operational analysis is focused on complex constellations and cases with potentially harmful effects on Liechtenstein and its reputation. Strategic analysis has been strengthened and enables the proactive identification of risks, trends, and patterns in effective support of national prevention efforts.**

## VI. Leadership and team strength as the foundation for lasting success

### Background

The FIU's team has grown significantly in recent years and has continuously evolved its structures in response to increasing demands and growing professional complexity. With the change in leadership in May 2025 and the subsequent adjustments in terms of personnel and organisation, a stable, high-performing, and functional structure was established. Despite ongoing challenges in resource management, internal organisation, and the implementation of digitalisation projects, the dedicated and capable team is optimally positioned to successfully navigate the coming phases of development together. We intend to continue the FIU's successful development by further optimising the organisational structure and openly tackling the challenges ahead as a team.

### Our team: the heart of the FIU

**We have values-driven leadership and a working culture built on trust and open communication. The working atmosphere supports the well-being and long-term performance of every individual. We operate together as a strong, diverse, and confident team. We see change as an opportunity for development and use it for continuous growth. Cohesion and a close sense of belonging are central elements of our culture, which is strengthened by humour and a positive team spirit.**



Financial Intelligence Unit (FIU)  
Pflugstrasse 16  
9490 Vaduz  
Liechtenstein  
Phone +423 236 61 25  
Email [info.sfiu@llv.li](mailto:info.sfiu@llv.li)  
[www.fiu.li](http://www.fiu.li)