

**FIJI FINANCIAL INTELLIGENCE UNIT
STRATEGIC PLAN
2014 - 2018**



Fiji FIU

Fiji Financial Intelligence Unit





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• OUR VISION

Protecting Fiji from Money Laundering

• OUR MISSION

1. Formulate and implement strategies to combat money laundering, terrorist financing and other serious crimes to ensure the safety and integrity of Fiji's financial system.
2. Ensure compliance with global standards on anti-money laundering and combating the financing of terrorism.
3. Assist in the detection, investigation and prosecution of money laundering and terrorist financing offences.
4. Provide timely and quality information and advice to our stakeholders.
5. Develop and utilise skilled staff.

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FOREWORD



Razim Buksh

I am pleased to present the five-year Strategic Plan of the Financial Intelligence Unit for 2014 – 2018. The Strategic Plan outlines the vision and missions of the FIU which will guide our work and strategies we would undertake to achieve our overall vision and missions for the next five years.

This Strategic Plan is based on five mission statements that have been refined since 2009 to better meet the demands placed on the FIU and to reflect the environment in which the FIU will operate from 2014 – 2018.

Going forward, while we have retained our vision of “Protecting Fiji from Money Laundering”, we shall embark on a more regional leadership role and work towards a greater global commitment and adherence to international anti-money laundering (AML) and combating the financing of terrorism (CFT) best practices.

An ambitious vision such as this would no doubt bring many challenges in the next five years for the FIU. The Strategic Plan addresses these challenges. The lessons learnt and efforts made by the FIU since we were established will also help us overcome these challenges. We will rely on our partner agencies from the Fijian Government, our regional and international

counterpart agencies, as well as our private sector stakeholders to fulfil this vision.

The Reserve Bank of Fiji has been instrumental in the setup of the FIU in 2006 and has contributed towards our success for the past seven years. I would like to acknowledge the Reserve Bank of Fiji for funding the operations of the FIU since its establishment and the administrative support and leadership that the Governors of the Reserve Bank have provided over the years. I look forward to this continuing support and commitment for the next five years. The National AML Council and its members have also provided their fullest support to the FIU and we look forward to a stronger partnership and support in the coming years.

I would like to thank the FIU team for their contribution to make the FIU what it is now and for their commitment and dedication to take the FIU to even greater successes and heights by 2018 and beyond.

A handwritten signature in blue ink, appearing to read "Razim Buksh". It is written in a cursive style with a blue horizontal line underneath it.

Razim Buksh
Director

OUR ENVIRONMENT

In developing this strategic plan, the FIU has considered the legal and administrative environment in which it operates.

Establishment of the FIU, Role and Functions

The FIU was established in January 2006 under the FTR Act. The FIU has the following five broad functional responsibilities:

- i. Collecting and Analysing Financial Transactions and Other Information;
- ii. Disseminating Financial Intelligence;
- iii. Regulatory and Compliance;
- iv. Public Education and Awareness;
- v. Domestic and International Coordination;

These FIU functions directly contribute to combating money laundering and other serious crimes in Fiji and to ensure the integrity of Fiji's financial system.

The powers, duties and functions are clearly defined in the FTR Act. These are, to:

- a. receive financial transaction and other information from financial institutions;
- b. analyse information and develop intelligence;
- c. disseminate intelligence and information of possible money laundering activities or other serious offences to appropriate law enforcement agencies;
- d. assist domestic and foreign law enforcement agencies in their investigation and prosecution of money laundering and other serious criminal activities;
- e. develop policies, guidelines and advisories under the FTR Act;

- f. enforce compliance by financial institutions with the requirements of the FTR Act;
- g. provide awareness and training to financial institutions, members of the public, and other stakeholders on the requirements in the FTR Act and on matters relating to money laundering; and
- h. maintain strong networking with domestic and foreign partner stakeholders and agencies.

The Director of the FIU is responsible for exercising the powers, duties and functions of the FIU as specified in the FTR Act.

Oversight of the FIU

The Minister for Justice is the line Minister responsible for the FTR Act.

Pursuant to section 23(3) of the FTR Act, the Director is responsible to the Minister for Justice or such other person as the Minister may appoint, in the performance of the Director's duties.

The Minister is also responsible for appointing the Director of the FIU on the recommendation of the National AML Council.

In 2005, the Minister delegated these powers to the Governor of the Reserve Bank of Fiji. Pursuant to this ministerial delegation under the FTR Act, the Director of the FIU now reports to the Governor of the RBF for the discharge of his powers, duties and functions provided under the FTR Act. Subsequent to this delegation and on the recommendation of the Governor, the Board of Directors of the RBF approved the organisational structure of the FIU.

Reporting to the National Anti-Money Laundering Council

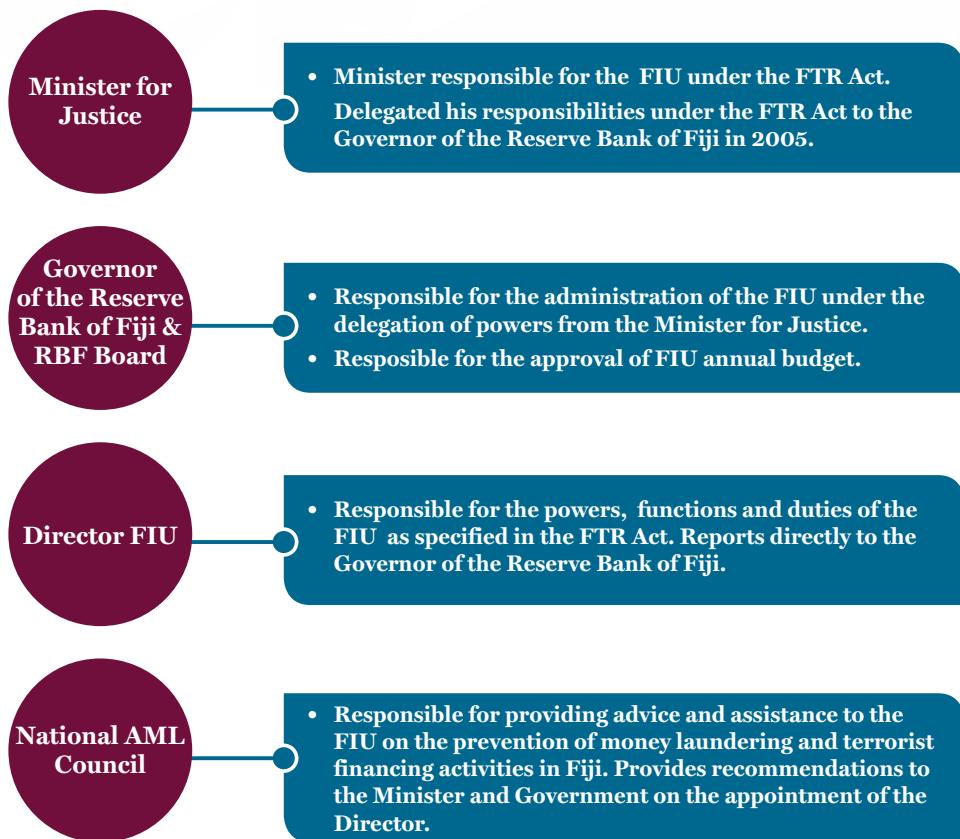
The National AML Council is established under the FTR Act and its members, roles and functions are also provided under the FTR Act.

The Council provides broad policy advice, assistance and guidance to the FIU on the

prevention of money laundering, terrorist financing and related activities in Fiji. The Council is also responsible for making recommendations to the Minister on the appointment of the Director of the FIU.

The FIU provides regular reports and updates to the National AML Council.

Entities and Businesses Covered by the FTR Act



Funding and Administration

The FIU is fully funded by the RBF and is organised as a separate functional group within the RBF's organisation structure. The annual budget of the FIU is submitted for the approval by the Board of the RBF each year. The FIU is accountable to the Governor and the Board for the use of funds allocated annually.

The FIU is administratively housed within the RBF. The FIU is subject to all the administrative protocols, policies and procedures of the RBF.

The FIU provides monthly reports of its operations to the Governors and six monthly work progress reports to the RBF Board. The FIU annual work plan is also submitted to the RBF Board.

Due to the nature of its establishment as part of the RBF, the FIU does not prepare and publish a separate set of financial statements on its operations. The expenditure of the FIU is included in the financial statements of the RBF and is subject to the Bank's internal and external audit.

The FIU also receives indirect financial support from the Fiji Police Force and the Fiji Revenue and Customs Authority (FRCA) through staff secondment to the FIU on a full time basis. The secondment arrangement is provided under the MOAs the FIU has signed with the two agencies.

The FIU does not currently receive any supplementary funding support from the Government.

The FIU also provides monthly updates of its operations to the National AML Council.

The FIU's organization structure and staff numbers are provided in **Appendix 1**

Independence of the FIU

While the FIU is administratively dependent on the RBF, the technical functions of the FIU are totally independent of the RBF. The Director of the FIU is responsible and accountable for the decisions relating to the delivery of the FIU core outputs. The functional and operational independence of the FIU is provided under Part 4 of the FTR Act.

The FTR Act requires that the consideration for appointment of Director FIU by the Minister (Governor of the RBF under delegation of authority) is subject to the recommendation of the National AML Council. The FTR Act also provides how the remuneration package of the Director FIU is determined.

To ensure that the functions of the FIU are not influenced by other parties, the Director of the FIU is solely vested with the powers to discharge the statutory and functional responsibilities of the FIU.

PROCESS FOR DEVELOPING THIS STRATEGIC PLAN

This Strategic Plan was developed considering the environment in which the FIU operates, in particular, issues such as the FIU's functions and its current administrative and funding arrangements.

The FIU has taken leadership in driving the AML/CFT framework in Fiji.

The National AML Council has also vested some of its support functions to the FIU to drive national AML legal, law enforcement and regulatory frameworks. The FIU is also mindful of its additional role on national risk assessment and international AML/CFT policy, typologies and mutual evaluation work. Therefore, this Strategic Plan takes due consideration of lessons learnt from the past and the new responsibilities and challenges that lies ahead, particularly under the new Financial Action Task Force Standards.

On 7 October 2013, the FIU held an internal discussion session to examine its current operations identifying its organizational strengths, weaknesses, opportunities and threats.

A strategic planning meeting was held on 8 October 2013 where consultations with internal and external stakeholders were held to consider their views and suggestions on issues that the FIU should focus on or improve, in going forward. High level input was provided by the Ministry of Justice and the Reserve Bank of Fiji.

A comprehensive review of the FIU's previous annual workplans (2009 – 2013) and annual reports (2009 – 2013) was also undertaken to identify common themes which should be considered in this strategic plan.

Following this review and consultation process, the strategic goals for the FIU for the next five years together with the appropriate strategies were identified. Specific action plan and timelines for each of the strategies have also been identified. Together these strategic goals, strategies and action plan form the strategic plan of the FIU for 2014 – 2018.

CORPORATE STATEMENTS

● Our Vision Statement

The vision of the FIU is “Protecting Fiji from Money Laundering”.

This vision has guided the FIU since 2009 and remains relevant for the next five years.

We have five missions to support our vision.

● Our Mission Statements

Our Mission is to:

1. Strengthen our compliance with international FIU and AML/CFT obligations;
2. Implement AML/CFT policies to ensure the safety and integrity of Fiji's financial system;
3. Implement an effective intelligence management framework;
4. Strengthen networking with our partners;
5. Enhance operational governance and communication.

● Our Key Strategic Goals

Our strategic goals for achieving these missions are:

1. Regional FIU Leadership;
2. Global and Best AML/CFT Practices;
3. Risk-Based Approach to Implementation of AML/CFT Policies;
4. Effective Compliance Regime for Financial Institutions;
5. Effective Tactical and Strategic Analysis Processes;
6. IT Based Intelligence and Case Management;
7. Engagement with our Partners;
8. Information & Intelligence Networking;
9. High Performance and Effective Team;
10. Governance and Proactive Communication.

•Our Strategies

Our strategic for 2014 – 2018 are:

1. Be an active and supportive member of the Association of Pacific Island FIUs.
2. Support the development of regional FIUs through training and policy advice
3. Represent FIU at the Egmont Group Plenary.
4. Assist in the national risk assessment project.
5. Liaise with APG and assist the National AML Council in the preparations for Fiji's next mutual evaluation.
6. Provide support to international partners on AML/CFT initiatives and engagements.
7. Comply with Egmont Group standards and best practices on information exchange.
8. Comply with international standards on FIU operations and functional independence.
9. Promote a risk based implementation of the Financial Transactions Reporting Act.
10. Provide guidance to financial institutions on the regulatory requirements.
11. Continue to provide effective training to financial institutions on the requirements of the FTR Act and Regulations.
12. Effectively supervise financial institutions for compliance with the FTR Act and Regulations.
13. Cultivate a stronger working relationship with the RBF and promote synergies in the supervision of RBF licensed financial institutions for AML/CFT compliance.
14. Strengthen our enforcement capability and ensure adequate and prompt enforcement action when necessary.
15. Develop and disseminate quality intelligence products for our stakeholders.
16. Improve the quality of intelligence provided through regular feedback to financial institutions and from users of intelligence reports.
17. Utilise advanced technology for the intelligence process.
18. Support the National AML Council
19. Strengthen relationships with existing domestic and international partners.
20. Enhance our network for information sharing.
21. Cultivate a skilled, motivated and high performing team.
22. Enhance operational processes to maximize efficiency and effectiveness.
23. Ensure corporate governance through strong internal controls and performance reporting.
24. Safeguard security of information and intelligence products.
25. Communicate effectively and proactively with stakeholders on AML issues and developments.

STRATEGIES AND ACTION PLAN

Our strategies and action plan for achieving our Missions and Goals are detailed as follows:

MISSION 1

Strengthen our compliance with international FIU and AML/CFT obligations

Strategic Goal #1: Regional FIU Leadership

- Be an active and supportive member of the Association of Pacific Island FIUs.
- Support the development of regional FIUs through training and policy advice.
- Represent FIU at the Egmont Group Plenary.

Strategic Goal #2: Global FATF and APG Best AML/CFT Practices

- Assist in the national risk assessment project.
- Liaise with APG and assist the National AML Council in the preparations for Fiji's next mutual evaluation.
- Provide support to international partners on AML/CFT initiatives and engagements.
- Comply with Egmont Group standards and best practices on information exchange.
- Comply with international standards on FIU operations and functional independence.

Strategy	Action	Timeline
1. Be an active and supportive member of the Association of Pacific Island FIUs.	1. Participate in meetings of the Association of Pacific Island FIUs. 2. Contribute to projects and activities of the Association of Pacific Island FIUs.	• 2014-2018 • 2014-2018
2. Support the development of regional FIUs through training and policy advice	3. Provide policy advice to regional FIUs. 4. Provide technical assistance through training, work attachment and mentoring.	• As and when required • As and when required
3. Represent FIU at the Egmont Group Plenary.	5. Attend the Egmont Group Plenary	• 2014-2018
4. Assist in the national risk assessment project.	6. Assist the National AML Council in the national risk assessment project.	• 2014-2015

Strategy	Action	Timeline
5. Liaise with APG and assist the National AML Council in the preparations for Fiji's next mutual evaluation.	7. Update the National AML Council and relevant agencies on Fiji's next mutual evaluation program.	• 2014-2015
6. Provide support to international partners on AML/CFT initiatives and engagements.	8. Undertake role of Chair of the APG Typologies Forum. 9. Participate as an expert international evaluator/reviewer for APG when requested. 10. Represent Fiji at the APG Plenary. 11. Participate at the AFI Financial Integrity working group meetings and Global policy forum. 12. Liaise with international agencies (e.g. APG; Egmont Group) on AML issues affecting Fiji. 13. Support APG and FATF initiatives and programs and contribute to planned projects.	• Ongoing • As and when required • 2014-2018 • 2014-2018 • As and when required • As and when required
7. Comply with Egmont Group standards and best practices on information exchange.	14. Represent FIU at the Egmont Group Plenary. 15. Ensure standard operating procedures comply with Egmont Group requirements. 16. Deal with any breaches of security protocols effectively and promptly.	• Ongoing • As and when required
8. Comply with international standards on FIU operations and functional independence.	18. Ensure operational and functional independence. 19. Develop and implement procedures on FIU security, tactical and strategic analysis, and regulatory obligations.	• 2014-2015 • 2014-2015

MISSION 2

Implement AML/CFT policies to ensure the safety and integrity of Fiji's financial system

Strategic Goal #3: Risk-Based Approach to Implementation of AML/CFT Policies

- Promote a risk based implementation of the Financial Transactions Reporting (FTR) Act.
- Provide guidance to financial institutions on the regulatory requirements.
- Continue to provide effective training to financial institutions on the requirements of the FTR Act and Regulations.

Strategic Goal #4: Effective Compliance Regime for Financial Institutions

- Effectively supervise financial institutions for compliance with the FTR Act and Regulations.
- Cultivate a stronger working relationship with the RBF and promote synergies in the supervision of RBF licensed financial institutions for AML/CFT compliance.
- Strengthen our enforcement capability and ensure adequate and prompt enforcement action when necessary.

Strategy	Action	Timeline
9. Promote a risk based implementation of the Financial Transactions Reporting Act.	20. Assist the National AML Council to conduct a national risk assessment. 21. Coordinate formulation of national strategy to implement the new FATF Recommendations. 22. Continue to provide support for financial inclusion initiatives. 23. Seek revision to the FTR Act to enable a risk based application of AML/CFT measures. 24. Address any policy obstacle to a risk based approach implementation.	• 2014-2015 • 2016 • As and when required • As and when required • As and when required
10. Provide guidance to financial institutions on the regulatory requirements.	25. Develop and issue Guidelines for financial institutions in consultation with the relevant supervisory authorities. 26. Formulate AML regulations and policies for new sector (e.g. casino sector) covered by the FTR Act. 27. Regularly brief and consult with AML Compliance Officers on policy issues and developments. 28. Regularly review and revise Guidelines issued	• As and when required • 2014-2018 • 2014-2018 • Ongoing

Strategy	Action	Timeline
11. Continue to provide effective training to financial institutions on the requirements of the FTR Act and Regulations.	29. Provide effective training to financial institutions on the requirements of the FTR Act and Regulations. 30. Provide support for the national AML computer based training centre. 31. Use the FIU website to disseminate timely information to financial institutions. 32. Organise “user pay” awareness programs on AML/CFT issues and developments where possible. 33. Regularly brief AML compliance officers on AML/CFT policies and developments.	• 2014-2018 • 2014-2018 • ongoing • 2014-2018 • 2014-2018
12. Effectively supervise financial institutions for compliance with the FTR Act and Regulations.	34. Undertake risk based compliance supervision (onsite and off-site) of financial institutions. 35. Create ongoing awareness on importance of compliance with AML/CFT requirements through the AML Compliance Officers Forum/meetings. 36. Conduct IT reporting compliance checks of financial institutions.	• 2014-2018 • Quarterly • 2014-2018
13. Cultivate a stronger working relationship with the RBF and promote synergies in the supervision of RBF licensed financial institutions for AML/CFT compliance.	37. Enter into a Memorandum of Agreement with RBF for the sharing of information and resources on compliance initiatives. 38. Provide support and advice to the RBF on their compliance supervision programs of licensed financial institutions. 39. Regularly update RBF supervisors on AML supervision issues and developments. 40. Work closely with RBF to ensure financial institutions' compliance with the FTR Act and Regulation through targeted on-site examinations of selected licensed financial institutions.	• 2014 • Ongoing • Ongoing • ongoing
14. Strengthen our enforcement capability and ensure adequate and prompt enforcement action when necessary.	41. Strengthen provisions in the FTR Act for administrative sanctions for breaches. 42. Effectively deal with non-compliance by financial institutions. 43. Issue compliance directives to enforce compliance with the FTR Act when required. 44. Share compliance findings through industry forums or publications.	• 2014-2015 • As and when required. • As and when required. • As and when required.

MISSION 3

Implement an effective intelligence management framework

Strategic Goal #5: Effective Tactical and Strategic Analysis Processes

- Develop and disseminate quality intelligence products for our stakeholders.
- Improve the quality of intelligence provided through regular feedback to financial institutions and from users of intelligence reports.

Strategic Goal #6: IT Based Intelligence and Case Management

- Utilise advanced technology for the intelligence process.

Strategy	Action	Timeline
15. Develop and disseminate quality intelligence products for our stakeholders.	<ul style="list-style-type: none">45. Develop strategic analysis framework and undertake quality strategic and tactical analysis.46. Receive and analyse Border Currency Reports and information from Customs.47. Disseminate quality financial intelligence and information on a timely basis.48. Strengthen the Border Currency Reporting framework by training relevant officials, providing relevant advice and raising awareness of the requirements.49. Hold regular meetings with law enforcement agencies to facilitate information sharing, follow up cases and better networking.50. Provide intelligence to law enforcement and other agencies when requested.	<ul style="list-style-type: none">• 2014-2018• 2014-2018• 2014-2018• 2014-2018• Ongoing• As and when requested

Strategy	Action	Timeline
16. Improve the quality of intelligence provided through regular feedback to financial institutions and from users of intelligence reports.	<p>51. Regularly obtain feedback on intelligence reports disseminated from law enforcement agencies.</p> <p>52. Provide regular feedback to financial institutions on suspicious transaction reports received.</p>	<ul style="list-style-type: none"> • Ongoing • Ongoing
17. Utilise advanced technology for the intelligence process.	<p>53. Manage the FIU's information database management and query system (FFIMSO).</p> <p>54. Automate the intelligence development processes where appropriate.</p> <p>55. Use the FFIMSO alert monitoring system and data mining system for analysis purposes.</p> <p>56. Improve data quality of financial transaction reports on FFIMSO through reporting compliance reviews.</p> <p>57. Effectively manage external databases accessed by the FIU.</p> <p>58. Expand the FIU's access to other government and private databases.</p> <p>59. Provide training for FIU staff on the use of TRAQ and other IT data analysis tools.</p> <p>60. Provide access of TRAQ database to external parties.</p>	<ul style="list-style-type: none"> • Ongoing • 2014-2015 • 2014-2015 • 2014-2018 • Ongoing • 2014-2018 • Ongoing • 2014-2018

MISSION 4

Strengthen networking with our partners

Strategic Goal #7: Engagement with our Partners

- Support the National AML Council.
- Strengthen relationships with existing domestic and international partners.

Strategic Goal #8: Information & Intelligence Networking

- Enhance our network for information sharing.

Strategy	Action	Timeline
18. Support the National AML Council	61. Participate as a member of National AML Council. 62. Provide secretariat support for the National AML Council. 63. Participate in the 3 AML Working Groups and provide secretarial support for the Working Groups.	• 2014-2018 • 2014-2018 • 2014-2018
19. Strengthen relationships with existing domestic and international partners.	64. Participate in various internal and external committees. 65. Provide assistance to pacific island FIUs through short-term attachments and in-country visits when requested. 66. Support partner agencies in their functions through the provision of quality and timely intelligence and provision of technical assistance (e.g. training, work attachments).	• Ongoing • 2014-2018 • 2014-2018
20. Enhance our network for information sharing.	67. Enter into Memorandum of Agreements with new partner agencies for information sharing and collaboration.	• 2014-2018

MISSION 5

Enhance operational governance and communication

Strategic Goal #9: High Performance and Effective Team

- Cultivate a skilled, motivated and high performing team.
- Enhance operational processes to maximise efficiency and effectiveness.

Strategic Goal #10: Governance and Proactive Communication

- Ensure corporate governance through strong internal controls and performance reporting.
- Safeguard security of information and intelligence products.
- Communicate effectively and proactively with stakeholders on AML issues and developments.

Strategy	Action	Timeline
21. Cultivate a skilled, motivated and high performing team.	68. Provide training to staff based on staff training and development needs. 69. Provide clear and regular feedback on staff performance. 70. Provide support for seconded staffs	• 2014-2018 • 2014-2018 • 2014-2018
22. Enhance operational processes to maximize efficiency and effectiveness.	71. Continuously review and improve internal processes and systems (Standard Operating Procedures). 72. Adopt electronic filing processes. 73. Develop and implement advanced and secure IT solutions to meet our needs 74. Promote synergies with the RBF IT Team.	• 2014-2018 • 2015 • 2014-2018 • Ongoing

Strategy	Action	Timeline
23. Ensure corporate governance through strong internal controls and performance reporting.	<p>75. Consider exit strategy for the FIU and explore funding support from the Government budget.</p> <p>76. Provide timely and relevant performance reports to the Governors on FIU operations.</p> <p>77. Comply with RBF requirements on governance reporting to the RBF Board.</p> <p>78. Publish Annual Reports of the FIU activities.</p> <p>79. Contribute to RBF Annual Reports.</p>	<ul style="list-style-type: none"> • 2015-2018 • As and when required • Annually • Annually • Annually
24. Safeguard security of information and intelligence products.	<p>80. Adopt appropriate procedures and controls to ensure the security and privacy of FIU data and information system.</p> <p>81. Continuously review procedures and controls on security of information and intelligence.</p> <p>82. Deal with any breaches of security protocols effectively and promptly.</p>	<ul style="list-style-type: none"> • Ongoing • Ongoing • As and when required
25. Communicate effectively and proactively with stakeholders on AML issues and developments.	<p>83. Regularly provide feedback on money laundering trends, cases and developments through regular meetings and briefings.</p> <p>84. Provide advice on AML policies and developments.</p> <p>85. Use the FIU website to communicate with stakeholders and the public.</p>	<ul style="list-style-type: none"> • Ongoing • Ongoing • Ongoing

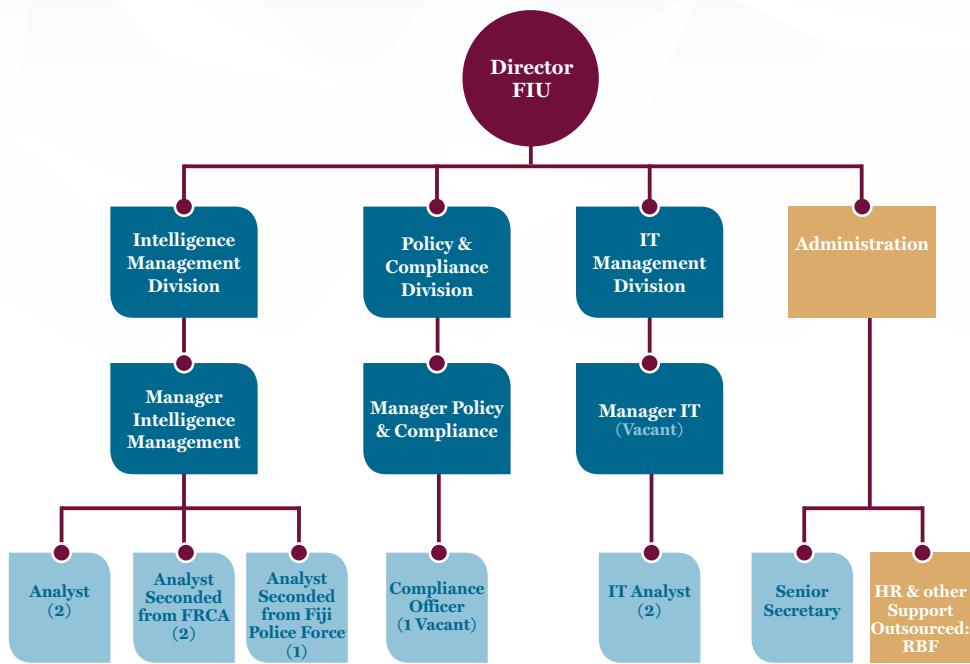
MONITORING IMPLEMENTATION OF THIS STRATEGIC PLAN

The Director FIU will be responsible for the overall implementation of the Strategic Plan.

Monitoring of the implementation of the Strategic Plan will be done annually as part of the

annual work planning cycle of the FIU. Progress on implementation will also be reported annually to the Governors of the RBF and the National AML Council.

APPENDIX 1 FIU STRUCTURE 2013



FIU CONTACT DETAILS

CONTACT INFORMATION

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Protecting Fiji from Money Laundering

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