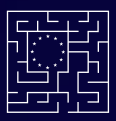

THE AIRE CENTRE
Advice on Individual Rights in Europe

Women and Illicit Finance in the Western Balkans: Expanding the Frontiers of Knowledge and Action

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ACRONYMS

AML	Anti-Money Laundering
CEDAW	Convention on the Elimination of All Forms of Discrimination against Women
CSO	Civil Society Organisation
EU	European Union
FATF	Financial Action Task Force
FEMNET	African Women's Development and Communication Network
GDP	Gross Domestic Product
GFI	Global Financial Integrity
IFFs	Illicit Financial Flows
OCG	Organised Criminal Group
OECD	Organisation for Economic Co-operation and Development
OSCE	Organisation for Security and Co-operation in Europe
UN	United Nations
UNESCO	United Nations Educational, Scientific and Cultural Organisation
UNODC	United Nations Office on Drugs and Crime
VAWG	Violence against Women and Girls
WB	World Bank

PREFACE

Illicit Financial Flows (IFFs) pose a significant challenge to societies worldwide, and the Western Balkans is no exception. The impact of IFFs extends beyond economic losses, as it undermines the rule of law, exacerbates social inequalities, and impedes the development of institutional capacities. While women are often among those most affected by these phenomena, their role in IFFs remains underexplored, both globally and within the region. This study seeks to address this knowledge gap by providing a comprehensive overview of the complex dynamics shaping women's involvement in IFFs across six jurisdictions in the Western Balkans – Albania, Bosnia and Herzegovina, Montenegro, Kosovo, North Macedonia, and Serbia.

The gender perspective in IFFs analysis has often been neglected in research and policy, leading to a limited understanding of why and how women become involved in these activities and the consequences of such criminal activities they face. The lack of gender-disaggregated data and research on this issue results in institutional responses that are gender-neutral, thereby leading to policies that fail to address the specific characteristics and needs of women and ultimately fail to tackle IFFs effectively. This study, therefore, highlights the urgent need for systematic, gender-sensitive data collection, alongside the development of strategies that take into account the unique factors shaping women's participation in IFFs.

This research is particularly significant because it provides empirical data about this phenomenon in the Western Balkans. Through interviews with nearly a hundred representatives of various institutions and organisations – including members of the judiciary, regulatory and financial institutions, civil society, academia, the media, and independent bodies – this study offers a rich body of information regarding the typical roles of women in IFFs, the factors influencing their involvement, as well as issues related to economic dependency, social stereotypes, gender discrimination, and the role and responses of the relevant institutions.

One of the key contributions of this study are its findings on the complex and multifaceted roles of women in IFFs – ranging from victims and facilitators to active participants and even organisers of criminal activities. Women are frequently instrumentalised as fronts for various types of financial fraud, whether through the formal registration of businesses or the use of their bank accounts to conceal illicit transactions. However, there are also instances where women occupy key leadership positions within criminal networks, particularly in areas such as tax evasion, money laundering, and corruption within the financial sector.

By analysing legal frameworks, available statistics, and concrete cases, this study identifies key challenges in the institutional responses to IFFs. Specifically, it highlights the socio-economic factors that make women more susceptible to instrumentalisation in the context of illicit financial flows, as well as the obstacles to recognising these patterns and successfully prosecuting this type of criminality. The study therefore emhasizes the need to understand how criminal groups exploit gender stereotypes to obscure their activities and evade law enforcement actions.

In addition, the study provides insights into international standards and comparative practices that could contribute to a more effective response to this complex issue. Through an in-depth analysis of the six jurisdictions – Albania, Bosnia and Herzegovina, Montenegro, Kosovo, North Macedonia, and Serbia – the study identifies specific challenges and opportunities for improving legislative and institutional approaches and practices in these countries. The study offers concrete recommendations for policymakers, judicial institutions, civil society organisations, and international donors to ensure a more robust and effective fight against financial crime. Special emphasis is placed on the need for cross-sectoral cooperation, as responses to IFFs are multifaceted and require coordination between the judiciary, the financial sector, and civil society organisations.

We hope that this report will serve as a valuable resource for all actors committed to strengthening the resilience of Western Balkan societies against illicit financial flows. Understanding the gender dimension of this issue is a crucial step towards developingcomprehensive and effective responses to this growing problem, whichincludes not only legal and institutional reforms but also measures aimed at women's economic empowerment, awareness-raising, and the enhancement of protective mechanisms for those most at risk of exploitation and instrumentalisation.

With respect,
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Research Fellow in Business and Human Rights
at the Bonavero Institute of Human Rights, University of Oxford

SUMMARY

The research "Women and Illicit Finance in the Western Balkans: Expanding the Boundaries of Knowledge and Action" was conducted within a regional project implemented by the AIRE Centre's Western Balkans Programme with the support of the UK Government. It was carried out to clarify the role of women in illicit finance, including organised crime activities, across six Western Balkan countries, with the aim of proposing recommendations on how national authorities can best address gender sensitivity when combating these practices. The research also aimed to determine the best ways to integrate a gender-sensitive approach into all future projects aimed at combatting organised crime and illicit finance in this region.

Illegal financial flows (IFFs) are a global challenge that undermines economic stability, fuels corruption and threatens human rights. Although women are disproportionately affected by the consequences of IFFs, their role in these processes is often overlooked. This research therefore emphasises the importance of the gender perspective in understanding and combating IFFs, revealing the complex dynamics that shape women's participation in these activities. This research provides comprehensive insight into the complex role of women in IFFs in the Western Balkans, covering Albania, Bosnia and Herzegovina, Montenegro, North Macedonia, Serbia and Kosovo. By combining an analysis of relevant international standards and regional specificities, it highlights the varied roles of women in IFFs, the factors affecting their involvement, as well as institutional responses to this problem.

Understanding what gender perspective entails is crucial when considering this issue. It is an analytical framework for examining how social, cultural and economic factors linked to gender roles influence women's motivation, modes of involvement, and the consequences of their participation in IFFs. The gender perspective thus also includes an assessment of specific vulnerabilities, such as marginalisation and violence, as well as the criminal networks' intentional exploitation of gender stereotypes to disguise their activities.

Research Methodology

As one of the first studies focusing on the gender dimension of IFFs in the Western Balkans, this research substantially contributes to understanding the role of women and the factors influencing their reasons and modes of involvement and consequences of their participation in IFFs.

The research was conducted in two phases. The first phase included a comprehensive review of available literature on IFFs and the role of women in organised crime, both globally and in the Western Balkan context. The aim of this review was to identify the key trends, gaps in knowledge and areas requiring further research. The second phase focused on collecting empirical data on women's roles in IFFs in the Western Balkans. The team developed semi-structured questionnaires, covering key aspects of the research topic. The questions were designed to identify the typical roles of women in IFFs, the factors influencing their involvement, economic dependence, social stereotypes and gender discrimination, the role of competent institutions and institutional responses, as well as the gaps in the available international resources and national strategies.

Data were collected from approximately 100 representatives of various institutions and organisations, including the judiciary, regulatory and financial institutions, civil society, academia, media and independent bodies. This diversity enabled multidisciplinary insight into complex topic and provided a rich body of data.

Structure of the Study

The study comprises eight chapters and four annexes. Chapters 1-3 include introductory remarks, the methodology and literature review, establishing the analytical framework on the role of women in IFFs, identifying key patterns of their involvement and highlighting gaps in previous research of this topic. Chapter 4 contains a detailed examination of relevant international standards and an explanation of how these standards can be implemented and adapted to the specificities of Western Balkan countries, and an identification of obstacles impeding their implementation. This chapter also includes a comparative overview of selected global

initiatives in this field, as well as useful guidance on ways to improve and harmonise regional approaches, highlighting best practices that may serve as a model for future reforms. The central part of the study sets out the empirical findings on the role of women in IFFs in each of the six Western Balkan jurisdictions (Chapter 5), as well as the key findings concerning the entire region (Chapter 6). Finally, Chapters 7 and 8 outline the research team's concluding observations and recommendations. The study also summarises potential directions for further research, emphasising that the gender dimension of women's participation in IFFs remains insufficiently explored and integrated into existing strategies for combating IFFs and organised crime.

Literature Review

The literature review revealed that there is **limited research of women's roles in IFFs and organised crime.**[1] Although the men's role in these activities is well-documented, **women are often portrayed as passive actors**, while their active role in IFFs and organised crime is either overlooked or oversimplified.

In addition to the complex nature of IFFs and organised crime,[2] **gender stereotypes,** which depict women as passive and victims, are used to explain the low rates of prosecution of women.[3] Gender stereotypes also influence assumptions that women are easier to control, prompting criminal networks to place them in leadership positions and giving rise to perceptions that they are victims or pawns.[4]

Existing sources highlight women's experiences, their motives for entering IFFs and organised crime, their roles in the "grey zone" between victim and perpetrator, as well as their roles of educators conveying the values and culture of criminal groups.[5]

Women involved in organised crime and/or IFFs exhibit varying levels of conscious engagement, largely depending on the stage at which they become involved, as well as individual factors.[6] Researchers studying this issue have reached opposing conclusions: while some argue that many women are coerced by family members,[7] others maintain that such cases are negligible.[8]

Some **reasons for joining organised criminal groups and involvement in IFFs**, such as economic factors, are similar for both men and women.[9] Others, which are more important for women, include existing relationships, partners, seeking protection and escaping abuse or prostitution.[10] Other factors influencing women's participation in organised crime and/or IFFs include gender inequality, poverty, violence, social norms and limited access to education and economic opportunities. Economically and socially vulnerable women are more susceptible to exploitation within criminal networks. The Global Gender Gap Report (World Economic Forum, 2023) indicates that no country has achieved full gender equality, while World Bank data show that most of the 700 million people living in extreme poverty are women. Gender-based violence further increases women's vulnerabilities, with the World Health Organisation (WHO) reporting that one in three women has experienced intimate partner violence. Social norms and gender stereotypes also limit women's opportunities, while family ties can act as both a risk and a protective factor. In some cases, women are coerced into participating in IFFs under pressure from partners or family members, while in others, their families provide them protection.

While men are generally perceived as perpetrators and rarely as victims of crime, women are seen as passive

1 R. Selmini, 'Women in Organised Crime', University of Chicago Press, 2020.

2 M. Soudijn, 'Wives, girlfriends and money laundering', Emerald Publishing, 2010.

3 OSCE Understanding the role of women in organised crime', 2023; M. Jaraba, The nexus of women and 'Clan Crime': unravelling the dynamics and constraints', Springer, 2024; R. Selmini, 'Women in Organised Crime', The University of Chicago Press, 2020.

4 B. Ćorić "The Glass Ceiling Puzzle, Legal Institutions and Shadow Economy, Feminist Economics, 2018.

5 See, e.g., R. Selmini, 2020; A. Guerreiro, S. Gomes, P. Sousa, 'Feminist Criminology and Women in Organised Crime: A Theoretical Exercise', Associação Portuguesa de Estudos sobre as Mulheres, 2022.

6 M. Soudijn, 2010.

7 E. Fraser, V. Ahlenback and N. Clugston, 'Linkages between Gender, VAWG, and SOC in Western Balkans', UK Aid, 2019; M. Jaraba, 2024.

8 M. Soudijn, 2010.

9 OSCE, 2023; F. Mejdini and K. Amerhauser, 'Resilient Balkans: Gender and Organised Crime', Resilience Fund, Global Initiative Against Transnational Organised Crime, 2022.

10 A. Guerreiro, 2022; OSCE, 2023.

participants and very rarely as organisers, to the point of statistical insignificance.[11] However, **there is increasing evidence that women play a significant role in IFFs, depending on the type of crime and criminal organisation**.[12] Some studies indicate that women frequently participate in money laundering as accomplices to their partners or family members, carrying out tasks such as opening bank accounts, transferring money or purchasing assets.[13]

Most sources related to the **Western Balkans** are publications by civil society or international organisations focusing on other aspects of women's roles in organised crime rather than their role in IFFs.[14] In the Western Balkan context, literature indicates that women are often invisible actors in IFFs, impeding their prosecution. According to available data, only 4-7% of prosecuted IFF-related cases involve women. Women's roles in criminal networks in the region are mostly non-violent and involve financial operations and money laundering[15].

International Standards

International standards provide the foundation for combating IFFs and emphasise the importance of integrating the gender perspective into legal and institutional frameworks. The key instruments include United Nations (UN) conventions, Financial Action Task Force (FATF) recommendations, European Union (EU) law and Council of Europe conventions which set guidelines for preventing financial crime and protecting women in these processes.

UN treaties play a crucial role in recognising the gender dimension of crime. The Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children **(Palermo Protocol)** to the UN Convention against Transnational Organised Crime mandates the protection of victims of human trafficking, particularly women and children, as well as conducting research and campaigns to mitigate the socio-economic factors making them vulnerable. Gender mainstreaming is considered the key aspect of the full implementation of the UN Convention against Transnational Organised Crime.[16] In addition, the **UN Convention against Corruption (UNCAC)** promotes transparency and accountability in the fight against corruption, recognising its disproportionate impact on women, while the **UN Convention on the Elimination of All Forms of Discrimination against Women** (**CEDAW)** obliges states to eliminate discrimination and ensure women have equal access to economic resources, which is essential for preventing their exploitation through IFFs.

Within the realm of **"soft law," FATF** recommends the analysis of gender risks in money laundering and terrorist financing, while the **UN Sustainable Development Goals (SDGs)** highlight the need to improve gender equality and strengthen institutions. At the **European level**, the **Council of Europe's Istanbul Convention and the EU legal framework** for combating money laundering indirectly contribute to protecting women from economic exploitation.

11 UNODC, Organised crime and gender: issues relating to the UN Convention against Transnational Organised Crime, Issue Paper, 2022, p. 12, available at: https://sherloc.unodc.org/cld/uploads/pdf/Issue_Paper_Organised_Crime_and_Gender_1.pdf.

12 R. Selmini (2020); A. Guerreiro, 2022.

13 See, inter alia, Adriana E. Rivera-Garza, "The Role of Women in Money Laundering in Latin America," Journal of Money Laundering Control, 2018; M. Jaraba, 2024.

14 See, e.g. F. Mejdini (2022); E. Fraser (2019); A. Stanojoska, D. Dimovski, E. Maksimova, 'The Handbook on Female Criminality in the Former Yugoslav Countries', Springer, 2023.

15 D. Stanković, Little Black Book of Organised Crime in Western Balkans, Belgrade Centre for Security Studies, 2022.

16 UNODC, Organised Crime and Gender: Issues Relating to the United Nations Convention Against Transnational Organised Crime (Issue Paper 2022).

Key Research Findings

This research highlights the complex and multifaceted roles of women in illicit financial flows in the Western Balkans. Depending on their social and economic status, level of education, access to protection, and broader social environment, women are perpetrators, accomplices, victims or witnesses. These roles often remain invisible to judicial, law enforcement and financial institutions due to deeply rooted gender stereotypes, limited legal frameworks, and insufficient institutional awareness and capacity to identify gender patterns in criminal activities. A particularly concerning finding is that women are often coerced into participating in illicit activities under threat or duress of their partners or other family members, fearing violence and stigma. Consequently, they are often unintentional accomplices — coerced or manipulated into criminal roles — but above all, they are victims of multiple forms of exploitation. This exploitation, often accompanied by physical, psychological and economic abuse, further exacerbates their marginalisation and limits their ability to escape the criminal milieu. **Economic dependence, social stereotypes, and structural inequalit**y render them particularly vulnerable and easily instrumentalised.

Women identified as perpetrators in IFFs often assume administrative or legal roles. They are usually formally registered as company owners used as fronts for money laundering. They rarely wield actual control over operations in such situations. Rather, they serve as a "protective buffer" for male network leaders. Women acting as accomplices provide logistical support, transfer money and maintain communication between network members. Criminal groups often use women for these tasks, assuming they will attract less attention of the authorities. In addition, in some cases, women are involved in financial transactions or property arrangements to conceal the criminal activities of their husbands or sons, which may be linked to legal exemptions from testifying against close relatives in certain jurisdictions.

Women also participate in IFFs and organised crime actively and voluntarily, often holding key positions in economic crime, particularly in cases of complex tax fraud schemes. There have been cases of embezzlement, tax evasion, and abuse of office in which the women were the masterminds of the criminal schemes, leveraging their positions in the banking sector or accounting.

The factors contributing to women's involvement in IFFs include traditional gender stereotypes, cultural norms, socio-economic inequalities, as well as family dynamics and gender-based violence. These circumstances result in women being either forced into criminal activities or in accepting them due to economic dependence or fear of violence and marginalisation. At the same time, institutions in the Western Balkans - judicial systems, police and financial regulators - fail to sufficiently recognise women's roles as active participants, leading to inadequate responses to the specific patterns of their involvement in IFFs. The absence of gender-sensitive policies and training further exacerbates the identification and prosecution of female actors, be they victims or perpetrators.

Western Balkan laws and institutions do not adequately address the gender dimension of IFFs, resulting in inconsistent administration of justice and impeding the collection of statistical data. Another aggravating circumstance is the lack of training of law enforcement, prosecutorial and judicial authorities in handling cases in which women are directly involved in criminal networks. National statistics rarely disaggregate data by gender, making it impossible to obtain a clear picture of the actual scale of the problem or to develop effective prevention and prosecution measures. Furthermore, gender-sensitive training on financial crime is either non-existent or sporadic and incomplete.

As per international standards, the analysis has shown that they are not consistently applied in Western Balkan countries, particularly with respect to the identification and suppression of gender stereotypes and economic abuse.

Finally, the research underscores the need for a shift in perspective: from viewing women solely as marginal or passive actors to understanding the full complexity of their roles. Although many international donors' development activities focus on combating illicit finance, corruption, and serious organised crime, and overall strategies promote gender equality, initiatives remain largely gender-blind in most cases. In this sense, integration of international standards and comparative practice examples can serve as a

framework for reform processes in Western Balkan countries, enabling more effective identification and suppression of gender-based patterns of IFFs. That is the only way to genuinely improve institutional response and develop comprehensive, gender-sensitive policies in this area.

Key Recommendations

Recommendations for improving the fight against IFFs and organised crime in the Western Balkans are based on the research findings, pointing to the need for an in-depth reform of the institutional approach, as well as societal attitudes towards women's role in crime:

Western Balkan countries should further **improve their legal and institutional frameworks, data collecting systems, relevant policies, and the capacities of law enforcement, judicial and financial institutions, taking into account the complex gender dimensions in combating IFFs and organised crime.** Lack of a legal framework explicitly recognising gender dynamics in IFFs can lead to inconsistent prosecution and lenient penalties for those who exploit women or keep them in a criminal environment. It may also result in impunity for the actual perpetrators of money laundering, while women who have been coerced or abused into committing criminal acts are prosecuted and convicted instead. Ultimately, this perpetuates injustice and reinforces the victimization of women. Therefore, specific measures should include improving the criminal legislation to reflect the realities in which women find themselves, including situations where they are formally accomplices but have in fact been compelled to participate.

Western Balkan countries should **systematically collect and analyse gender-disaggregated data, the lack of which precludes precise examination of the patterns of roles that women occupy and the development of effective anti-IFF strategies**. Such statistics should include data on the various roles of women in IFFs, including those formally registered as owners of companies used for money laundering, accomplices in transferring illicit funds, victims of coercion and economic abuse, as well as those in leadership positions in criminal networks.

Staff of law enforcement, judicial and financial institutions should be trained in collecting and analysing gender-specific data on IFFs. Lack of knowledge about women's roles in IFFs and of gender-specific data reduces the possibility of creating effective prevention policies. Therefore, all institutions, including financial intelligence agencies, should apply gender analysis and statistically capture women's involvement in IFFs to facilitate the integration of the data in regional strategies. This includes improving the methodology for collecting gender-disaggregated data, clearly defining the forms of women's involvement in IFFs and continuously exchanging such data at the regional level.

Western Balkan countries should also introduce measures for monitoring and evaluating their anti-money laundering strategies to determine whether their methodologies adequately address specific risks related to women. They should develop gender-focused indicators for that purpose and regularly present the collected results to the public and international bodies responsible for assessing progress. These indicators should accurately describe the various levels of women's involvement, from marginalised and forcibly engaged women to those holding leadership positions in criminal groups. Such an approach would create a more realistic picture of the allocation of roles in IFFs and open space for more targeted interventions.

Western Balkan countries should establish more transparent systems for registering and tracking the real owners of businesses, with particular attention to protecting women who have been exploited as nominal owners.

Western Balkan institutions should enhance cooperation with international organisations to leverage the experiences and knowledge of various stakeholders involved in IFF issues.

Western Balkan countries should develop legal, psychological and economic support programmes for victims to facilitate women's rehabilitation and reintegration outside the criminal milieu. The national authorities and international donors should focus on building support mechanisms for

women who wish to leave criminal networks or have been forcibly drawn into money laundering and related activities. The research indicates that women are often targets of various forms of blackmail, manipulation or violence, leading to their long-term dependence on criminal networks. These networks carefully assign roles to women to minimise the risk of detection. At the same time, societal taboos, shame and fear of stigmatisation prevent many women from reporting cases of coercion or exploitation. This is why special emphasis should be placed on psychological, legal and economic support, not only to protect victims, but to enable long-term prevention and reduce the risk of re-engagement in crime as well.

Donor organisations should adopt a gender-sensitive approach to project design, directing funds towards women's economic and legal empowerment. Local organisations, which often have the closest contact with vulnerable groups, should receive long-term support and be included in project decision-making processes. To ensure the sustainability of results, a combination of qualitative and quantitative methods in project monitoring and evaluation is recommended, alongside the organisation of regional forums and online platforms for sharing knowledge and experience. This would create a stronger regional network of actors committed to the effective and sustainable suppression of IFFs.

The development of a Resource Centre is essential to support programme and project teams throughout the design, implementation, and evaluation stages. This Centre should include a multidisciplinary team of experts and offer capacity-building activities to promote gender mainstreaming. It should also function as a knowledge hub, sharing lessons learned and influencing government policies. Gender-sensitive research and policy papers should be conducted to deepen understanding and ensure the sustainability of gender initiatives. In-depth gender-sensitive analyses should be integrated into programme and project development, assessing the legal frameworks, identifying gender-discriminatory provisions and examining workforce composition and leadership representation. **Key gender mainstreaming principles should be applied in all programme and project cycle management stages, including the development of gender-responsive outcomes and indicators and safeguard mechanisms to prevent projects from exacerbating gender inequalities.**

Recommendations for the financial sector and non-government actors call for awareness-raising through various communication channels and education, as well as regular updating of risk assessment procedures.

Western Balkan countries should also **initiate public dialogue on gender stereotypes**, as the tacit belief that women are less suspicious participants in financial misconduct allows organised crime networks to instrumentalise them for money transfers, administrative tasks or asset concealment. Precisely this leads to situations where women's responsibility is either minimised or overlooked, impeding prosecution and preventing a precise comprehension of their roles. **There is a particular need for the education and sensitisation not only of the staff of law enforcement agencies, the judiciary and financial institutions, but of society at large as well.** Given that one of the biggest issues is the gender stereotype portrayal of women as inherently "non-participants" in financial crime, media and educational campaigns should highlight numerous cases where women actively contribute to IFFs or are coerced into them. This would help dismantle prejudices and improve the identification of various mechanisms of exploitation. At the same time, it would provide both victims and potential perpetrators with the opportunity to more easily find their way to institutions offering advisory, psychological and legal assistance.

1. INTRODUCTORY REMARKS

Illicit financial flows (IFFs) are one of the greatest threats to the global economy, contributing to market destabilisation, corruption, organised crime and the reduction of state budget revenues. The most common definition describes IFFs as financial flows originating from illegal activities, through which money or capital is acquired, transferred and exploited from one country to another.[17] These flows can take the form of corruption,[18] money laundering,[19] human trafficking,[20] financing of terrorism,[21] tax evasion and avoidance[22] which, although not always incriminated, is often included in this definition because "illicit" also encompasses the "socially unacceptable" relying on the same structures, mechanisms and jurisdictions.[23] IFFs are often linked to organised crime, where an organised criminal group is defined as a structured group of three or more persons, existing for a period of time and acting in concert with the aim of committing one or more serious crimes or offences in order to obtain, directly or indirectly, a financial or other material benefit.[24] However, IFFs can also be considered a separate crime.

Illicit financial flows pose a global challenge; estimates are that they account for between 2% and 5% of the world's GDP, i.e. between $1.6 and $4 trillion annually, according to UNODC data,[25] wherefore they are one of the main factors destabilising international financial systems.[26] IFFs deplete domestic resources and tax revenues needed to fund poverty reduction programmes and infrastructure in developing countries. They undermine social equality and legal certainty and strengthen criminal networks. Despite growing international attention to this issue, the gender dimension of IFFs remains underexplored and the role of women in these processes is often overlooked, even though women are disproportionately affected by the consequences of IFF. The gender dimension of an analysis involves examining how gender roles, social power relations and structural inequalities shape participation, consequences and institutional responses to IFFs. In this context, the gender perspective ensures that policies, research and practices in this field do not rely on gender-neutral assumptions but actively recognise and address the specific challenges faced by women and men.[27] Understanding these gender aspects is crucial for assessing the IFFs' broader impact on society. The reduction of tax revenues caused by IFFs disproportionately affects sectors such as education, sexual and reproductive health and social protection, which are essential for gender equality and support for women.[28]

When allocating scarce resources, governments often prioritise certain areas, such as security over social services, which negatively impacts women, given the feminisation of poverty, their exposure to violence

17 Illicit Financial Flows (IFFs), World Bank Group, 7 July 2017, available at: https://www.worldbank.org/en/topic/financialsector/brief/illicit-financial-flows-iffs; Global Financial Integrity (GFI), available at: https://gfintegrity.org/issue/illicit-financial-flows/.

18 The UN defines corruption as abuse of entrusted power for private gain, see the UN Convention against Corruption of 2003, available at: https://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf.

19 FATF defines money laundering as the processing of criminal proceeds to disguise their illegal origin. See FATF's "40 Recommendations on Money Laundering," 2003, available at: https://www.fatf-gafi.org/en/publications/Fatfrecommendations/Fatf-recommendations.html.

20 The UN Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organised Crime defines trafficking in humans as "the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation." The Protocol is available at: https://www.ohchr.org/en/instruments-mechanisms/instruments/protocol-prevent-suppress-and-punish-trafficking-persons.

21 In the International Convention for the Suppression of the Financing of Terrorism, the UN defines financing of terrorism as the provision or collection of funds with the intention that they should be used or in the knowledge that they are to be used, in full or in part, in order to carry out… any act intended to cause death or serious bodily injury to a civilian, or to any other person not taking an active part in the hostilities in a situation of armed conflict, when the purpose of such act, by its nature or context, is to intimidate a population, or to compel a government or an international organisation to do or to abstain from doing any act. The Convention is available at: https://treaties.un.org/doc/db/terrorism/english-18-11.pdf.

22 OECD defines tax evasion as the deliberate concealment of income or assets to escape paying the taxes due on them. See: OECD, Study on the Role of Tax Intermediaries, 2008, available at: https://www.oecd.org/content/dam/oecd/en/publications/reports/2008/03/study-into-the-role-of-tax-intermediaries_g1gh-8b48/9789264041813-en.pdf.

23 V. Grondona, N. Ponte and C. Enriquez, 'Illicit Financial Flows Undermining Gender Justice', Friedrich Ebert Stiftung, 2016.

24 This definition originates from the 2000 UN Convention against Transnational Organised Crime.

25 UNODC, Money Laundering, available at: https://www.unodc.org/unodc/en/money-laundering/overview.html.

26 UNODC; Estimating illicit financial flows resulting from drug trafficking and other transnational organised crime, 2011, p. 7, available at: https://www.unodc.org/documents/data-and-analysis/Studies/Illicit_financial_flows_2011_web.pdf.

27 This obligation stems from the Preamble to the Istanbul Convention, which states that historically unequal power relations between men and women are key to understanding gender inequality and that it is necessary to integrate a gender perspective into policies and programmes aimed at combating violence against women and discrimination. It is also a methodological approach first promoted by the European Commission in 1996, that all public policies, programmes and laws be analysed through the lens of their impact on both women and men, in order to prevent existing and future inequalities. See: Incorporating equal opportunities for women and men into all Community policies and activities, COM (1996) 67 final.

28 What are the gender dimensions of IFFs? Strengthening African Women's Engagement and Contribution, FEMNET, 2017.

and the disproportionate burden of unpaid care they bear.[29] Furthermore, women often occupy invisible, supportive roles in criminal networks, either as formal owners of shell companies or as facilitators in money laundering schemes. These roles frequently place them in a "grey zone," where their involvement is only partially recognised and their responsibility often remains undefined, further complicating their identification and prosecution.

Accurate and reliable data on women's participation rates in organised criminal groups are not available at a global level, which is compounded by the absence of national statistics on participation rates.[30] UNODC estimates that women account for approximately 4% of individuals prosecuted in organised crime cases in the Western Balkans, a figure comparable to global trends. Between 2012 and 2018, women made up 7% of those convicted for participating in an organised criminal group in the Western Balkans - 72% of them were convicted for drug production or trafficking, 16% for arms trafficking, while human trafficking and migrant smuggling accounted for 8% and 4%, respectively. On the other hand, In the past five years, women accounted for up to 10% of all criminal offenders. They also accounted for an average of 15% of the perpetrators of economic and financial crimes, as well as abuse of office.[31]

The Western Balkan region is characterised by specific social and cultural circumstances shaping the dynamics of IFFs and the role of women in these flows. Traditional gender stereotypes, the glorification of violent masculinity, conspicuous criminal lifestyles,[32] economic dependence and limited employment opportunities contribute to the marginalisation of women, rendering them more vulnerable to exploitation and manipulation. At the same time, women also emerge as key actors, whether in supportive roles (e.g., as formal owners of shell companies or facilitators in money laundering) or, in rare cases, as organisers of illicit activities. Women are often drawn into criminal activities through family or emotional relationships, which further complicates their identification as key actors. Simultaneously, criminal groups deliberately exploit gender stereotypes to evade judicial scrutiny - women are often perceived as "less suspicious," making them ideal enablers or primary agents of illicit activities.

International organisations, such as the UNODC,[33] are beginning to recognise the importance of the gender perspective in combating IFFs. However, implementation of their guidelines at the national level remains a challenge, particularly in regions with limited capacity to enforce gender-sensitive policies. Therefore, this research aims to provide comprehensive insight into the role of the gender component in IFFs, with focus on the Western Balkans: Albania, Bosnia and Herzegovina, Montenegro, North Macedonia, Serbia and Kosovo. Based on the analysis of available literature and empirical research conducted in the region, the report explores the key factors influencing women's roles, institutional perceptions of their involvement and shortcomings in the national frameworks and practices in combating IFFs.

The report is structured to provide a holistic overview of the current situation and offer concrete recommendations at various levels. Following the introduction and presentation of the methodology, the report focuses on the literature review, key research findings by jurisdiction and overall conclusions. In its final sections, the report offers recommendations for programmes and policies at both the national and international levels, aiming to integrate the gender perspective into responses to IFF. The report thus not only contributes to existing knowledge, but creates space for future research and actions in this important field as well.

29 A. Waris, Illicit Financial Flows: Why We Should Claim These Resources for Gender, Economic and Social Justice, Association for Women's Rights in Development, 2017.

30 The Netherlands, Italy and the United Kingdom reported that women accounted for 9%, 2% and 5% individuals participating in organised crime respectively, but such statistics are rare.

31 These statistical data concern only the main perpetrators of the crimes; data on the number of women accomplices, witnesses or victims of crime are unavailable.

32 F. Mejdini, 2022.

33 See, e.g., Study on Illicit Financial Flows, Associated with Smuggling of Migrants and Trafficking in Persons from GLO.ACT Partner Countries to Europe, UNODC, 2023, available at: https://www.unodc.org/documents/human-trafficking/2023/New_publications/GLOACT_Study_on_Illicit_Financial_Flows_-_E-Version.pdf.

2. METHODOLOGY

2.1. Research Methodology

The research methodology relies on a combination of a desk-top analysis and the collection of primary data through individual interviews and focus groups with relevant stakeholders, such as representatives of the judiciary, lawyers, notaries, law enforcement agencies, regulatory and financial institutions, as well as representatives of the media sector, academia and civil society. This multidisciplinary approach enables a deeper understanding of the complex social and institutional dynamics shaping the roles of women in IFFs. The key challenge of the research lies in the limited availability of gender-disaggregated statistical data, which highlights the need for improved data collection and better monitoring of the gender dimension in this area.

2.2. Research Approach

The research was conducted in two interrelated phases. The first phase involved a comprehensive review of the available literature on IFFs and the role of women in organised crime, both globally and in the context of the Western Balkans. The aim of this review was to identify the key trends, knowledge gaps and areas requiring further research. The second phase of the research relied on empirical data collected in Albania, Bosnia and Herzegovina, Montenegro, North Macedonia, Serbia and Kosovo. This regional approach allowed for a comparative analysis and the identification of common patterns, as well as specific challenges unique to each society.

2.3. Instruments and Techniques

The research team developed semi-structured questionnaires covering key aspects of the subject of the research. The questionnaires contained seven main questions with sub-questions related to the roles of women in illicit finance (e.g., money laundering) and organised crime in the Western Balkans, as well as the factors and reasons for women's involvement. The questions focused on identifying the typical roles of women in illicit financial flows, such as aiding and abetting, complicity, victimisation or leading criminal operations. The researchers further examined the factors influencing women's involvement, including economic dependence, social stereotypes, the role of relevant institutions and institutional responses, as well as gaps in available international resources and national strategies.

The topics of the research activities centred on the role of women in illicit financial flows and organised crime in the region. Workshops and interviews included representatives of various sectors, including the judiciary, financial and regulatory institutions, the non-government sector, media, academia, financial intelligence units and gender equality bodies. Data were collected from approximately 100 representatives of these institutions and organisations who participated in the workshops and interviews.

Between mid-September and mid-November 2024, 16 workshops and 15 individual interviews were conducted with approximately 100 participants across six Western Balkan jurisdictions. The participants included representatives of the judiciary, regulatory and financial institutions, civil society, academia, the media and independent bodies. Such diversity enabled multidisciplinary insight into this complex issue and provided a rich body of data. To ensure confidentiality and encourage open discussion, the Chatham House Rules applied, allowing participants to express their views freely without fear of consequences.

2.4. Data Analysis

The data collected during interviews and workshops were analysed qualitatively, using thematic analysis to identify key patterns and factors. The analysis included identifying the roles women assume within criminal structures, examining factors such as coercion, stereotypes and motivation and assessing the capacity of judicial and regulatory bodies to recognise and address the gender aspects of illicit financial flows. Further-

more, the comparative analysis enabled the examination of judicial practices and perceptions of women's roles in the countries in the region.

2.5. Research Limitations

The research faced several key limitations. First, the lack of gender-disaggregated statistical data posed a major challenge, as national statistics rarely acknowledge gender differences in IFF cases. Second, the sensitivity of the topic and the stigma surrounding the association of women with organised crime created significant challenges in collecting confidential data. Finally, the socio-cultural stereotypes prevailing in the region may have influenced the honesty of the participants' responses during interviews and workshops, further complicating the interpretation of results.

2.6. Originality of the Methodology

Several aspects of this research stand out. This was the first time the gender perspective was integrated into research of IFFs in the Western Balkans, raising new questions and introducing a different analytical framework. A multidisciplinary research team, including judicial officials and experts in economics, sociology and gender studies, provided a comprehensive analysis and interpretation of the results. Focus on the regional perspective, incorporating six Western Balkan jurisdictions, allowed for the identification of specific patterns and laid the groundwork for developing recommendations tailored to local contexts. This methodology not only contributes to understanding the phenomenon of illicit financial flows and the role of women, but also serves as a basis for shaping concrete policies and practices at both the national and international levels.

3. LITERATURE REVIEW

3.1. The Impact of IFFs on Women

As noted, the roles women play in IFFs are insufficiently explored and require further investigation at both the global level and within the Western Balkans region.[34]

Most of the literature focuses on the indirect impact of IFFs on women,[35] with a smaller portion addressing the direct effects of corruption on women and the debate on whether women are less tolerant of IFFs and corruption in general. This debate is still ongoing as some argue that women are less likely to tolerate IFFs, while others dispute this claim, citing well-known examples of women playing major roles in IFF scandals. Some authors also contend that the underrepresentation of women in senior leadership positions should not be attributed solely to bias and gender discrimination, but also to appointment of family members to executive roles to ensure that the interests of owners and managers remain closely aligned. Some also suggest that women are easier to control, which could be leveraged to place them in leadership positions while viewing them as victims or pawns.[36]

Nevertheless, gender stereotypes, which portray women as passive and victimised, are used to explain the low prosecution rates of women, [37] as well as the tedious and complex nature of money laundering cases.[38] Women involved in money laundering exhibit varying levels of conscious engagement, largely depending on the stage at which they become involved and individual factors.[39] Some studies suggest that many of them are coerced by family members,[40] while others indicate the opposite; proving these roles, however, remains challenging.[41]

3.2. The Role of Women in IFFs: What Does Literature Tell Us?

The literature review has also shown that little research has been conducted on the role of women in organised crime.[42] While the role of men in organised crime and IFFs is well-documented, the role of women is often neglected or simplified. Existing sources point out women's experiences, their motives for entering organised crime, their roles in the "grey zone" between victim and perpetrator, as well as their roles of educators conveying the values and culture of criminal groups.[43]

Some reasons for joining organised criminal groups, such as economic motives, are similar for both men and women.[44] Others - such as existing relationships, partners, seeking protection and escaping abuse or prostitution - are, however, more important for women.[45] While men are generally perceived as perpetrators and rarely as victims, women are seen as passive participants and very rarely as organisers, to the point of statistical insignificance.[46]

However, there is increasing evidence that women play a significant role in IFFs, depending on the type of crime and the criminal organisation.[47] Some studies indicate that women frequently participate in money laundering as accomplices to their partners or family members, carrying out tasks such as opening bank

34 B. Ćorić, 2018.
35 Arising from lower tax revenues and increased consumption taxes to make up for money lost to IFFs, which disproportionately affect women.
36 B. Ćorić, 2018.
37 OSCE (2023); M. Jaraba, 2024; R. Selmini, 2020.
38 M. Soudijn, 2010.
39 Ibid.
40 E. Fraser et al, 2019; M. Jaraba, 2024.
41 M. Soudijn, 2010.
42 R. Selmini, 2020.
43 See, e.g., R. Selmini (2020); A. Guerreiro, 2022.
44 OSCE, 2023; F. Mejdini, 2022.
45 A. Guerreiro (2022); OSCE (2023).
46 UNODC, Organised crime and gender: issues relating to the UN Convention against Transnational Organised Crime, Issue Paper, 2022, p. 12, available at: https://sherloc.unodc.org/cld/uploads/pdf/Issue_Paper_Organised_Crime_and_Gender_1.pdf.
47 R. Selmini (2020); A. Guerreiro (2022).

accounts, transferring money, or purchasing assets.[48] They help to obscure IFFs and integrate them into more legitimate financial systems, enabling organised criminal groups (OCGs) to maintain and expand illicit activities while avoiding detection and oversight, as women are perceived as less likely to attract suspicion from law enforcement agencies.[49] Furthermore, although less common, women can be leaders or organisers of criminal groups engaged in IFFs. One such woman was Enedina Arellano Félix, who led the Tijuana drug cartel in Mexico following the arrest of her brothers.[50] Women may sometimes hold leadership roles permanently, but more often, they serve as temporary replacements for incapacitated male leaders.[51]

3.3. Facts Impacting Women's Involvement in IFFs

Numerous factors influence women's involvement in IFF, including, notably:

- **Gender inequality:** Women continue to face discrimination and inequality in many walks of life, including education, employment and access to resources, rendering them more vulnerable to exploitation and involvement in IFFs. According to the World Economic Forum's 2023 Gender Gap Index, no country in the world has achieved full gender equality.[52]
- **Poverty:** Poverty is one of the main factors driving women into IFFs. Women living in poverty are often forced to accept any job, even an illegal one, to provide for themselves and their families. According to the World Bank, more than 700 million people live in extreme poverty and most of them are women.[53]
- **Gender-based violence:** Women victims of gender-based violence are often coerced into participating in IFFs to escape further abuse or to secure protection for themselves and their children. According to the World Health Organisation, one in three women globally has experienced physical or sexual violence from an intimate partner.[54]
- **Limited access to education and economic opportunities:** Women who lack access to education and economic opportunities have fewer chances of securing legal employment and sustaining themselves. This makes them more vulnerable to involvement in IFFs. According to UNESCO, 129 million girls are not attending school, and women remain underrepresented in the labour market and politics.[55]
- **Social norms and gender stereotypes:** Social norms and gender stereotypes often restrict women's roles and opportunities, potentially pushing them into IFFs. For example, women may be perceived as less capable of performing certain jobs or expected to be obedient and not question authority. This can make them more vulnerable to manipulation and exploitation.
- **Family ties:** Family ties can be both a risk factor and a protective factor for women in the context of IFFs. In some cases, women may be forced to participate in IFFs by their partners or family members. In other cases, the family may provide support and protection for women who are victims of IFFs.
- **Lack of awareness and information:** Many women are unaware of the risks and consequences of IFFs and may become involved in such activities without realising they are illegal. Lack of information on IFFs and ways to protect themselves from exploitation makes women particularly vulnerable.

These factors are interconnected and influence each other. For example, poverty and gender inequality can increase the risk of gender-based violence, which may lead to women's involvement in IFFs.

It is important to recognise that these factors do not affect all women in the same way. While some women are more resilient to these risks, others are particularly vulnerable. Additionally, women are not only victims of IFFs; they can also be active participants and even leaders in illicit financial activities.

48 See, inter alia, Adriana E. Rivera-Garza, "The Role of Women in Money Laundering in Latin America," Journal of Money Laundering Control, 2018; M. Jaraba, 2024.

49 Women often (1) register companies in their own name to integrate in the financial systems and obscure the origin of the money; (2) put assets in their own name to store and transfer criminal proceeds; and (3) intervene to help relatives who are bugged or followed.

50 This case is described in detail in the book by Blancornelas, Jesús, El cártel: Los Arellano Félix: la mafia más poderosa en la historia de América Latina, 2010.

51 R. Selmini (2020).

52 World Economic Forum, Global Gender Gap Report 2023, available at: https://www3.weforum.org/docs/WEF_GGGR_2023.pdf.

53 World Bank Group, Poverty, Prosperity, and Planet Report, Pathways Out of the Polycrisis, 2024, available at: https://openknowledge.worldbank.org/bitstreams/8f-505de6-d365-4f10-aa5a-353c39616895/download.

54 World Health Organisation, Violence against women, 25 March 2024, available at: https://www.who.int/news-room/fact-sheets/detail/violence-against-women.

55 UNESCO, Global Education Monitoring Report Team, Global education monitoring report 2022: gender report, deepening the debate on those still left behind, 2022, https://unesdoc.unesco.org/ark:/48223/pf0000381329.

3.4. Regional Context of the Western Balkans

Most publications relating to the Western Balkans were produced by civil society or international organisations and they focus on other aspects of women's roles in organised crime rather than their involvement in IFFs.[56] These sources typically contain only brief references to financial crimes. Many sources are quantitative in nature, relying on scarce data replicating biases and the invisibility of women.[57] Some sources provide useful policy recommendations but are often not specifically tailored to the needs of individual countries.[58] Other studies highlight the importance of traditional gender roles that are also replicated in organised crime. For instance, their authors have observed that Slavic women occupy more prominent positions than their Albanian and Bosnian counterparts.[59] One study even suggests that women in the region generally hold less significant roles, primarily involving assistance and logistics, such as conveying messages between leaders and members and participating in financial operations and money laundering.[60] Women are often used by family members engaged in criminal activities to protect them when they are crossing borders or moving through sensitive areas. Their role is largely non-violent, focusing on financial transactions and money laundering operations.

The Western Balkans are definitely facing specific challenges regarding the gender dimension of illicit financial flows. Social norms and gender stereotypes are deeply embedded in the regional cultures, often marginalising women and limiting their access to formal economic channels. This results in situations where women are sometimes forced to participate in illicit activities, either as accomplices or as victims. For example, in some cases, women are formally registered as owners of companies used for money laundering, while their male partners retain actual control over operations.

Research in the region suggests that women are frequently used as "invisible actors" in IFFs because they are assumed to be less suspicious to supervisory institutions. However, these assumptions further impede the recognition of their roles in judicial processes. According to available data, the share of women prosecuted for criminal activities related to IFFs in the region ranges from just 4% to 7%, indicating serious gaps in institutional perceptions and responses. In other words, most of the existing studies focus on men as the dominant actors in organised crime, while women are often portrayed as passive participants or victims. Such a one-sided analysis overlooks the complexity of the roles women assume in IFFs.

3.5. Research Gaps and Future Directions

While there is a growing body of research of women's roles in IFFs, significant gaps remain in our understanding of this phenomenon. Below are some of the key areas that require further investigation:

- A more detailed research into the various roles women play in IFFs, including their motivations, experiences and consequences of engaging in illicit activities should be conducted. It should also include an analysis of the factors prompting women to assume specific roles in IFFs, such as their socio-economic status, family ties, social norms and gender stereotypes.
- Research should improve understanding of how gender norms, stereotypes and inequalities impact women's participation in IFFs. This should include an analysis of how gender inequalities manifest at various stages, from recruitment and involvement in criminal activities to prosecution and sentencing.
- Research should Investigate how IFFs affect women, including their physical and mental health, economic security and social status. This should encompass an analysis of the long-term consequences of IFFs on women, such as trauma, stigmatisation and social exclusion.
- Research should evaluate the effectiveness of policies and programmes aimed at preventing

56 See, e.g., F. Mejdini, 2022; E. Fraser (2019); A. Stanojoska, D. Dimovski, E. Maksimova, 'The Handbook on Female Criminality in the Former Yugoslav Countries', Springer, 2023.

57 R. Selmini, 2020; A. Guerreiro (2022). See F. A. Stanojoska, 2023.

58 See, e.g., F. Mejdini, 2022; OSCE, 2023.

59 OSCE, 2023; R. Selmini, 2020.

60 D. Stanković, 2022.

and combating IFFs, taking into account the gender dimension. This should include an assessment of how policies and programmes can be tailored to meet the specific needs and experiences of women, ensuring that they have equal access to justice and support.

- Given the increasing use of new technologies in IFFs, researchers should explore how these technologies are used for the recruitment, exploitation and control of women and how effective strategies can be developed to combat IFFs in the digital environment.
- Research should identify the specific factors influencing women's roles in IFFs in each of the Western Balkan countries, taking into account the social, cultural, economic and political contexts. This would facilitate the development of targeted policies and programmes tailored to the specific needs and challenges in each country.

Understanding the role of women in IFFs is crucial for designing effective strategies to combat this problem. Research in this field needs to be intensified, with policies and programmes based on evidence and taking into account the gender perspective.

3.6. Contribution of This Research

This research substantially contributes to understanding the role of women in IFFs in the Western Balkans. It is one of the first studies to focus on the gender dimension of IFFs in the region. The research is based on empirical data collected across six jurisdictions in the Western Balkans, providing insight into the specific factors influencing women's roles in IFFs and allowing for comparisons between different countries. Notably, the study analyses the various roles women may have in IFFs, including those of victims, participants, witnesses and organisers. This enables a deeper understanding of the complexity of women's involvement in IFFs. Furthermore, the research identifies key factors that contribute to women's involvement in IFFs, facilitating the development of targeted policies and programmes for preventing IFFs. The research provides concrete recommendations for improving policies and practices in combating IFFs, taking into account the gender dimension. Finally, it contributes to academic literature on IFFs and gender equality, serving as a valuable basis for further research in this field.

4. RELEVANT INTERNATIONAL STANDARDS AND COMPARATIVE OVERVIEW

International Standards and the Fight against Illicit Financial Flows (IFFs)

International standards provide a basis for the effective fight against illicit financial flows (IFF) and include important guidance on the integration of the gender perspective. The below section outlines the key conventions and recommendations, their significance and implementation in the Western Balkans.

4.1. UN Conventions

Important conventions mandating the recognition of the gender dimension in criminal activities have been adopted at the global level.

4.1.1. The Palermo Protocol

The Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (the Palermo Protocol), which supplements the UN Convention against Transnational Organised Crime, is a particularly important instrument. Notably, Article 6 requires State Parties to take into account the age, gender, and special needs of victims of trafficking in persons in applying provisions of that article on assistance and protection. Additionally, Article 9 mandates the implementation of measures such as research, information and mass media campaigns and social and economic initiatives to prevent and combat trafficking in persons and steps to alleviate the factors that make persons, especially women and children, vulnerable to trafficking, such as poverty, underdevelopment and lack of equal opportunity. Article 10 further mandates the organisation of training for law enforcement and other personnel, which should take into account gender-sensitive issues. In its 2020 report, the UNODC details how women are often exploited within criminal networks, not only as victims but also in roles where they may be coerced into complicity.[61] This complexity necessitates nuanced approaches in law enforcement and judicial proceedings to ensure adequate consideration of women's circumstances and the pressures they face. The report urges law enforcement agencies to adopt gender-sensitive approaches in human trafficking investigations, including training personnel to identify signs of gender-based exploitation and provision of support tailored to the needs of women rescued from such networks. The UNODC has also prepared an analysis of the gender dimension of organised crime, offering concrete proposals on how this UN convention should be applied to incorporate gender aspects.[62]

4.1.2. UNCAC

The United Nations Convention against Corruption (UNCAC) is the first global, legally binding treaty aimed at combating corruption. As such, it plays a key role in strengthening international efforts to tackle a broad range of corrupt practices, including money laundering and other forms of corruption that directly affect economic stability and justice. Through provisions such as Article 5, UNCAC promotes transparency and accountability – the key elements in identifying and dismantling corrupt schemes that often have gendered consequences. UNCAC effectively contributes to the fight against corruption by providing mechanisms to facilitate the understanding and handling of corruption activities affecting women.

States Parties to the UNCAC commit to taking concrete measures to prevent corruption and protect all citizens, particularly women, who may be disproportionately affected as victims of corruption impacting their economic and social opportunities. For example, Article 14 of this treaty encourages states to enhance transparency of ownership and ensure public access to information on beneficial ownership of legal entities, which is crucial for preventing the misuse of women's identities in financial schemes. Furthermore, implementation of the UNCAC can significantly improve the protection of women in economic processes,

61 See UNODC Global Report on Trafficking in Persons, 2020, p. 51, available at: https://www.unodc.org/documents/data-and-analysis/tip/2021/GLOTiP_2020_15jan_web.pdf-

62 UNODC, Organised crime and gender: issues relating to the UN Convention against Transnational Organised Crime, Issue Paper, 2022, available at: https://sherloc.unodc.org/cld/uploads/pdf/Issue_Paper_Organised_Crime_and_Gender_1.pdf.

promoting justice and equality. In particular, the Convention obliges states to ensure the protection and support of corruption victims, including women who are often susceptible to exploitation in corrupt activities. It also provides for the creation of legal and institutional frameworks enabling women to access legal mechanisms to protect their rights and interests.

4.1.3. CEDAW

The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) is the key international instrument addressing the elimination of discrimination against women in all walks of life. Article 2 obliges states to eliminate all forms of discrimination against women through legislative and institutional measures, Article 5 acknowledges the need to modify the social and cultural patterns of conduct of men and women perpetuating stereotypes about women, while Article 6 mandates the fight against trafficking in women and sexual exploitation. This treaty is particularly important for combating IFFs since it establishes a legal framework that States Parties can use to strengthen laws and policies aimed at protecting women from economic exploitation and discrimination. Article 13 requires of states to ensure that women have equal rights in economic and social life, including the right to bank loans, mortgages and other forms of financial credit, which is crucial for preventing situations in which women are unfairly exploited in IFFs. Similarly, Article 15 guarantees women equal access to legal services and equal treatment before the law, forming a foundation for the fight against corruption and illicit financial schemes particularly targeting women.

CEDAW also provides a mechanism for reporting and recommendations through its periodic reviews of States Parties, enabling the identification and addressing of specific issues related to women's roles in IFFs. For example, general recommendations and concluding observations for specific countries often include calls for strengthening legal and regulatory frameworks to protect women from economic exploitation. For instance, General Recommendation No. 34 on rural women is particularly relevant in contexts where IFFs are linked to land fraud and corruption.[63] General Recommendation No. 38, for its part, provides guidance to states on their obligations to combat trafficking in women and girls, including the economic aspects of this issue.[64] This document underscores the importance of providing trafficking victims with appropriate protection, support and access to legal services, which directly addresses IFFs funding such crimes. This general recommendation also highlights that structural, gender-based discrimination creates vulnerabilities leading to trafficking in women and girls. Specific provisions addressing these issues include an analysis of economic injustices that disproportionately affect women and the need to tackle these root causes as part of prevention efforts.

4.2. "Soft Law" Sources at the Universal Level

The Financial Action Task Force (FATF) is a global body that sets standards for combating money laundering and financing of terrorism. Its recommendations provide a framework for identifying and addressing IFFs, including gender risk analysis.[65] Its relevant recommendations are crucial for understanding the socio-economic factors influencing women's involvement in criminal activities. Recommendation No. 1 emphasises the need for risk assessments arising from socio-economic factors and gender marginalisation. Recommendation No. 2 encourages inter-institutional cooperation, particularly in cases involving the gender dimension of criminal activities. Finally, Recommendation No. 10 provides a detailed due diligence procedure for identifying beneficial account holders, including gender analysis to detect patterns of female exploitation.

Additionally, the UN Sustainable Development Goals (SDGs) offer a global framework for promoting gender equality and strengthening institutions. SDG 5 (Gender Equality) and SDG 16 (Peace, Justice and Strong Institutions) are particularly significant for combating IFFs while integrating the gender perspective. Specifically, SDG 5.1 aims to eliminate all forms of discrimination against women, SDG 16.3 promotes enhanced access to justice for all citizens, including vulnerable groups, while SDG 16.4 focuses on reducing IFFs and strengthening transparency.

63 General recommendation No. 34 (2016) on the rights of rural women, CEDAW/C/GC/34, 7 March 2016.
64 General recommendation No. 38 (2020) on trafficking in women and girls in the context of global migration, CEDAW/C/GC/38, 20 November 2020.
65 The recommendations are available at: https://www.fatf-gafi.org/en/topics/fatf-recommendations.html.

4.3. European Sources

4.3.1. Council of Europe Sources

The Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention), focusing on the prevention of violence against women, the protection of victims and the integration of gender equality, has been adopted at the European level, within the Council of Europe. Its relevance to IFFs lies in the protection of women coerced into criminal networks. Article 4 guarantees women the right to equal treatment and non-discrimination, as well as the right to live free from violence, which applies even when they are involved in criminal activities as victims of coercion. Article 49 obligates states to take the necessary legislative or other measures to ensure the effective investigation and prosecution of offences, whilst having regard to the gendered understanding of violence.

The Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime (Strasbourg Convention) provides a framework for States Parties to strengthen their legislation to combat money laundering more effectively, which is often linked to IFFs. While this treaty primarily focuses on the financial and legal aspects of money laundering, its indirect contribution to gender equality can be seen in the strengthening of the legal framework that can protect women from economic crimes better. Women are often disproportionately affected by financial crimes, including human trafficking, which is frequently funded through IFFs. The Convention, therefore, indirectly contributes to the protection of women by providing mechanisms to counteract the financial foundations of these criminal activities.

Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (Warsaw Convention) aims to strengthen the fight against money laundering and terrorist financing by ensuring fast access to financial information and implementing robust measures for the search, seizure, and confiscation of criminal proceeds and it builds upon the 1990 Strasbourg Convention by expanding its scope to include the financing of terrorism and reinforcing international cooperation and asset recovery mechanisms, without direct reference to gender dimensions of illicit finances but its indirect impact definitely has a profound effect on involvement of woman in different fields of money laundering, corruption and organised crime.

Council of Europe Member States have also ratified two conventions addressing corruption. The Criminal Law Convention on Corruption obliges States Parties to incriminate various forms of corrupt activities, including bribery, corruption in the private sector, money laundering and account offences. This convention also promotes international cooperation in criminal matters related to corruption. The CoE Civil Law Convention on Corruption focuses on strengthening legal measures against corruption through civil law provisions and compensation of damages resulting from corrupt practices. While these conventions primarily target corruption in a general sense, they have an implicit impact on gender equality. Corruption often discriminates against vulnerable groups, including women, by restricting their access to resources, education and economic opportunities. An effective fight against corruption can help create a fairer society in which women enjoy full equality.

4.3.2. European Union Sources

Although no EU source explicitly links the gender perspective to anti-money laundering regulations, the EU has been continuously working on improving its legal and regulatory frameworks for combating money laundering, and gender equality is an important aspect of all EU policies, including financial regulations. The EU Anti-Money Laundering Directives (AMLD), particularly the Fourth (4AMLD) and Fifth AMLD (5AMLD), as well as the recently adopted Sixth AMLD (6AMLD), provide a framework for enhancing transparency by improving the identification of ultimate beneficial owners of legal entities and imposing obligations for thorough customer due diligence, which may include identifying gender-specific risks. Furthermore, the EU Gender Equality Strategy 2020-2025 highlights the need to address gender-based inequalities that may contribute to or arise from IFFs. This strategy includes initiatives to reduce economic disparities, which may also comprise measures against the economic exploitation of women.

4.4. Integration of the Gender Perspective into International Instruments

Integration of the gender perspective into the fight against IFFs is a crucial element for effectively addressing this complex global problem. International instruments provide a legal framework for combating criminal activities that not only destabilise economic systems but also directly harm women's lives and rights. The full implementation of these international instruments and their adaptation at the national levels, especially in contexts where structural gender inequalities persist, remain the key challenge. Further progress requires explicit reference to the gender dimension in the contexts of cases regulated by these instruments, as well as ensuring continuous education and awareness-raising about the gender dimension of IFFs among legislators, judicial bodies and financial institutions. Enhanced international cooperation in information sharing, resource allocation and best practice exchange in combating IFFs, with particular emphasis on gender equality, is also needed.

4.5. Comparative Overview of Global Initiatives and Practices

Gender analysis in the prosecution of financial crimes and organised crime is becoming increasingly relevant at the global level. While many countries have yet to develop policies that fully integrate the gender perspective into this field, there are significant examples of how gender analysis is being used to better understand and combat financial and organised crime.

4.5.1. China: Gender Analysis and Financial Crime

Although China does not have specific practices that use gender-disaggregated data for prosecuting financial crimes, academic research highlights the significance of gender in corporate fraud.[66] Studies covering companies listed on the Shanghai and Shenzhen stock exchanges indicate that the presence of women in executive positions is associated with a lower likelihood of corporate fraud.

For instance, a study conducted on a sample of Chinese companies between 2004 and 2014 found that the likelihood of corporate fraud by firms with female Chief Financial Officers (CFOs) is about 3% lower than among firms with male CFOs.[67] This reduction is more pronounced when female CFOs have a higher level of education and external job opportunities, suggesting that female CFOs are more sensitive to fraudulent activities when they perceive higher risk.

Additional research confirms these findings - the presence of female CFOs in Chinese firms is associated with lower likelihood of accounting fraud, particularly in private companies compared to state-owned enterprises.[68] The authors of these studies emphasise that female CFOs perform their managerial roles and basically conservative gender roles simultaneously to secure their leadership position in Chinese culture.

These findings open the possibility for applying gender analysis in researching financial crime in China. Existing public records, such as the China Securities Regulatory Commission Enforcement Actions Research database (CSMAR), can be used for further analysis of gender patterns in fraud and money laundering.

4.5.2. United Kingdom: Gender Perspective in Prosecuting Organised Crime

In 2020, the United Kingdom introduced new judicial guidance for prosecuting gang-related crimes, incorporating gender-specific considerations.[69] Under the guidance, prosecutors are required to assess whether women and girls involved in criminal activities were subjected to coercion, violence or manipulation.

The authors of the guidance pay particular attention to women who are partners of criminals and often become part of criminal networks through relationships marked by violence and control. The guidance also highlights the practice within County Lines criminal networks, where criminals use women to move and store drugs and money.

66 See Jin-hui Luo, Chenchen Peng and Xin Zhang, "The impact of CFO gender on corporate fraud: Evidence from China", Pacific-Basin Finance Journal, Vol. 63, 2020, available at: https://www.sciencedirect.com/science/article/abs/pii/S0927538X20301189.

67 Ibid, p. 3.

68 Jing Liao, Xutang Liu, David Smith, "Female CFOs and corporate accounting fraud: Evidence from China," 2019, available at: https://acfr.aut.ac.nz/__data/assets/pdf_file/0008/226547/181737-UPDATE-Female-CFOs-and-corporate-accounting-fraud,-Evidence-from-China.pdf.

69 The guidance is available at: https://www.cps.gov.uk/legal-guidance/gang-related-offences-decision-making.

This approach is particularly relevant for the Western Balkans, as it can serve as a model for integrating gender analysis into the prosecution of organised crime, particularly in cases of human trafficking, money laundering and the exploitation of women in criminal networks.

4.5.3. Peru: Gender Dimension in the Fight against Organised Crime

Peru's National Multisectoral Policy for Combating Organised Crime (2019–2030) integrates the gender perspective into preventive measures and crime suppression policies.[70] This strategic document recognises the role of gender dynamics in criminal activities and underscores the need for collecting gender-disaggregated data to identify patterns of criminal behaviour among men and women.

Furthermore, Peru focuses on identifying gender-specific factors contributing to criminal activities, including economic inequalities, violence against women and societal norms that marginalise them. The policy envisages use of gender-disaggregated data in risk assessments and policymaking, while also developing specific support programmes for women at risk of involvement in criminal networks.

Peru has also incorporated the gender perspective into the training of judicial, police and social service staff to enhance their ability to recognise gender patterns of crime and respond effectively.

This approach demonstrates how states can use gender analysis not only to penalise crime, but also for prevention through a deeper understanding of the causes of crime and its gender aspects.

4.5.4. Pakistan: Gender Analysis in Combatting Human Trafficking

Pakistan has incorporated the gender perspective into its National Action Plan to Combat Human Trafficking and Migrant Smuggling, focusing, in particular, on the collection of gender-disaggregated data. The objective is to improve the analysis of gender dynamics in these criminal activities, allowing for more precise policymaking and strategy development. The plan highlights the necessity of collecting gender-disaggregated data to better understand the roles of women and men in human trafficking and migrant smuggling.

Pakistan has also introduced specific mechanisms for protecting women victims of human trafficking, including shelters, legal aid and social and economic reintegration programmes. It has placed special emphasis on improving investigative techniques and evidence collection to ensure adequate prosecution of the perpetrators of these crimes.

4.5.5. Latin America: Integration of the Gender Perspective in Institutions

Latin American institutions are increasingly recognising the importance of gender analysis in the fight against organised crime. El PAcCTo, a regional programme aimed at strengthening institutions, has developed a Gender Strategy based on research among judicial, police and prison institutions in 14 countries in the region.[71]

The programme focuses on strengthening institutions in the judiciary, police and prison systems, with particular emphasis on integrating gender analysis. Research conducted among judicial and police institutions in 14 countries has shown a high level of awareness of the importance of gender analysis but also a lack of tools and resources for its effective implementation.

Some of the key measures already implemented include the development of gender-responsive national policies to combat organised crime, the establishment of specialised units for investigating cases of human trafficking and gender-based violence, training for judges and prosecutors on the gender aspects of organised crime and the development of gender-sensitive methodologies for evidence collection and case prosecution.

70 UNODC, Politica national multisectorial de lucha contra el crimen organizado 2019-2030, available at: https://sherloc.unodc.org/cld/treaties/strategies/peru/per0003s.html?lng=en&tmpl=sherloc.

71 See El PacCto, Latin American institutions consider the gender approach in fighting organised crime, available at: https://elpaccto.eu/en/latin-american-institutions-consider-the-gender-approach-essential-in-fighting-organised-crime/.

4.5.6. Uzbekistan: Judiciary and Gender Analysis in the Fight against Human Trafficking

In 2019, Uzbekistan launched an initiative in cooperation with the OSCE to strengthen the role of the judiciary in combating human trafficking, with particular emphasis on the importance of gender-disaggregated data.[72] The goal is to provide judicial authorities with better insight into gender dynamics in human trafficking and develop more effective responses to this phenomenon.

4.5.7. Canada: Gender Analysis in Financial Investigations

Canada has been employing gender analysis in policymaking for decades. The Project Protect, launched within these efforts in 2016, focuses on preventing money laundering linked to human trafficking. In its first year, the initiative led to a 60% increase in reports of human trafficking and migrant smuggling cases.[73]

Canada has developed a range of gender-specific indicators for detecting suspicious financial transactions, including patterns such as financial transactions between men and women that indicate exploitation.[74] This model could serve as an example for the Western Balkans in developing better tools for recognising gender patterns in financial crime.

These examples demonstrate how the integration of gender analysis into the fight against financial crime and organised crime can improve the effectiveness of institutions and strategies. Western Balkan countries still lack gender-disaggregated data in these areas. However, the introduction of the gender analysis could substantially contribute to a better understanding of the roles women play in criminal networks and to the development of more effective preventive and repressive measures.

4.6. Overview of Development Activities of International Donors in the Western Balkans

Donor engagement in the fight against corruption, money laundering, and organised crime remains strong across the six Western Balkan countries – Albania, Kosovo, North Macedonia, Bosnia and Herzegovina, Serbia, and Montenegro. Various donors, including the European Union, OSCE, the Council of Europe, UN agencies, USAID, and the Regional Anti-Corruption Initiative, continue to invest in strengthening institutional capacity and supporting reforms. There is a growing emphasis on improving legal frameworks and financial oversight mechanisms to create a more stable and inclusive environment.

Gender perspectives are gaining recognition in donor programs, with increasing awareness of the importance of integrating women into decision-making processes related to financial crime prevention. Although gender considerations are still developing in this context, some initiatives recognize the need to analyze sex-disaggregated data and promote women's leadership in financial and judicial institutions.

Research conducted by OSCE on gender inequalities in property ownership in Bosnia and Herzegovina and Montenegro has highlighted the role of financial inclusion in enhancing women's resilience to economic exploitation. Additionally, UN Women, the World Bank, and SIDA are actively working on gender-responsive governance and economic empowerment, laying the foundation for a more inclusive system. While donor programs such as IPA III and the Council of Europe's Horizontal Facility acknowledge gender equality as a priority, the next crucial step is to expand concrete measures within anti-corruption and financial crime prevention initiatives.

In Albania and North Macedonia, EU and USAID support strategies that promote gender inclusion in anti-corruption efforts. In Kosovo, UN Women implements initiatives focused on gender-responsive governance, while in Serbia and Montenegro, the Council of Europe and OSCE strengthen institutional capacities

72 OSCE OSR/CTHB, Highlights of the International Conference: The Critical Role of the Judiciary in Combating Trafficking in Human Beings (13–14 November 2019 in Tashkent, Uzbekistan), SEC.GAL/67/20, 20 May 2020.

73 See more at Financial Transactions and Reports Analysis Centre of Canada, available at: https://fintrac-canafe.canada.ca/intro-eng.

74 Canada, Updated Indicators: Laundering of proceeds from human trafficking for sexual exploitation, available at: https://fintrac-canafe.canada.ca/intel/operation/oai-hts-2021-eng.pdf.

for financial investigations. In Bosnia and Herzegovina, UNDP and OSCE are incorporating gender aspects into projects aimed at improving financial resource accessibility.

Additional investments in analysing the gender dimensions of corruption and organised crime could yield significant benefits, including more precise data and enhanced strategies for incorporating women into financial crime prevention efforts. Increasing women's participation in institutions responsible for financial crime investigations, providing training and mentorship, and elevating their visibility in decision-making processes would contribute to the more effective implementation of policies in this area.

Donors can further support initiatives that raise awareness of gender perspectives in anti-corruption and money laundering efforts. Through targeted research, education, and specialized programs, key challenges and opportunities can be identified to ensure the effective integration of gender considerations into financial and judicial systems.

5. KEY FINDINGS BY JURISDICTION

5.1. Albania

5.1.1. Legal Framework and Challenges

IFFs, money laundering and financing of terrorism are incriminated by the Criminal Code and Law No. 9917 on Prevention of Money Laundering and Financing of Terrorism. These offences fall under the jurisdiction of general prosecution offices and courts of general jurisdiction, while the Special Prosecution Office (SPAK) and the Special Court have jurisdiction in cases involving organised criminal groups.

Although the legal framework is aligned with international standards (FATF recommendations), challenges remain in its implementation and effectiveness. Specifically, the lack of a gender-sensitive approach in both the legislation and its application is a major issue.

Proving these offences is highly complex, often resulting in the dismissal of the cases. In asset investigations conducted by SPAK under the Anti-Mafia Law, the burden of proof lies on the individual under investigation - SPAK requires they provide evidence of the legality of their assets. Prosecutors bear the burden of proof in cases handled by general prosecution offices.

Women are often viewed solely as victims, with the relevant authorities disregarding their potential active involvement in these criminal activities, whether through complicity, coercion or exploitation. It has been observed that women are sometimes exploited in money laundering and terrorist financing schemes, particularly in real estate transactions, where they are formally registered as property or business owners while actual control remains in the hands of men.

Furthermore, women are subject to coercive practices and forced to renounce their inheritance and marital property rights. The use of women as perpetrators or accomplices in money laundering and terrorist financing offences may partly stem from the fact that the Criminal Code prescribes more lenient penalties for women.

The Albanian Chamber of Notaries does not have specific provisions on the gender perspective, which indicates the need for regulatory amendments to raise awareness of the gender dimension of these issues.

5.1.2. Statistics and Data Availability

Gender-specific data on criminal cases related to money laundering and terrorist financing are limited. The Financial Intelligence Agency (FIA) keeps data on reports, but they are not disaggregated by gender. The Justice Ministry's annual statistical reports contain data on the offenders' gender, but they do not specifically focus on cases related to money laundering and terrorist financing.

Institutions such as the Bank of Albania, the Albanian Financial Intelligence Unit (FIU), the Albanian Financial Supervisory Authority (AFSA) and other relevant agencies do not collect data in this manner. This impedes the understanding of the scale and nature of women's involvement in these crimes, consequently undermining the development of effective strategies for their prevention.

According to the data of the Anti-Corruption Minister's General Directorate, 78 of the suspects were men and 34 (44%) were women in the 46 criminal reports filed between 2021 and 2023. Many of the women were involved in document forgery and abuse of office, particularly in postal and civil registry services.

5.1.3. Case Examples

Various cases illustrating the role of women in illicit finance in Albania were collected during the research:

- Women may be involved in money laundering through family connections, acting as intermediaries or "laundering" proceeds of crime committed by their spouses or other family members.
- Women may be coerced into participating in money laundering or terrorist financing, often under threat or economic pressure, or because they will receive lighter penalties or sanctions.
- In some cases, women may use their business positions for money laundering, or they may knowingly or unknowingly engage in transactions related to illicit financial activities.

> An NGO representative participating in the focus group in Albania discussed the case of a woman who became a victim of online fraud. The woman connected with an individual on social media who promised her easy money if she opened a bank account and used it to transfer money. She agreed, but later realised that the money she had transferred had been obtained through criminal activities. This case illustrates how women can be exploited and become victims in the context of IFFs, particularly in the digital environment.

Several concrete examples were also mentioned. In 2024, SPAK seized properties owned by the former leader of a political party in Albania and her mother on suspicion of corruption and money laundering. This case demonstrates how women are often the formal owners of assets linked to criminal proceeds and how they are used as nominal owners of such assets. In cases of administrative fines imposed on notaries who failed to report suspicious transactions, it was observed that female notaries were more frequently penalised because they accounted for most notaries. Finally, according to court records, women are often listed as formal representatives of businesses used for illicit transactions, while the actual hidden control of operations remains in the hands of men. One example concerns a woman who was used to set up a company that served as a front for drug trafficking.

5.1.4. Training and Institutional Cooperation

Various officials and institutions, including notaries, lawyers, judges, prosecutors, tax and customs officials and the police, play a crucial role in combating money laundering and terrorist financing. However, awareness and understanding of gender dynamics in these crimes are often insufficient. Training for relevant stakeholders is essential to improve their ability to identify and appropriately respond to cases involving women, whether as victims or perpetrators. Institutional cooperation, including information exchange and coordination of activities, is also crucial.

Training sessions for notaries on these offences have been organised in collaboration with the FIA, but the gender perspective was not included. Plans are to intensify cooperation with the Ministry of Justice and the FIA to organise training with focus on gender aspects. Interlocutors also recognise the need to develop gender-sensitive training programmes and collect relevant statistics. The Association of Microcredit Organisations has highlighted the lack of awareness among women themselves and the barriers they face in achieving financial independence, particularly in rural areas, where women are often formal business owners, while men make the actual decisions.

5.2. Bosnia and Herzegovina

5.2.1. Legal Framework and Challenges

Bosnia and Herzegovina (BiH) has a comprehensive legal framework addressing illicit financial flows and organised crime. Key laws include the Criminal Code of Bosnia and Herzegovina, the Law on the Prevention

of Money Laundering and Terrorist Financing, as well as relevant entity-level legislation. State institutions, including the State Investigation and Protection Agency (SIPA), ministries of internal affairs, prosecutors' offices at all levels of government, courts and tax authorities, play key roles in law enforcement and financial investigations. However, the gender perspective has not been systematically incorporated into the planning and implementation of measures to combat these crimes.

Furthermore, the implementation of the legal framework faces several challenges. Gender dimensions are not adequately considered during financial investigations and the prosecution of illicit activities, or during prevention planning and sentencing. Law enforcement agencies often adopt a neutral approach, failing to recognise the specific roles and motivations of women in these activities. In practice, insufficient coordination between judicial institutions, tax authorities, notaries public, banks and other relevant stakeholders hinders the effective resolution of cases. Inadequate financial flow oversight and control mechanisms (particularly related to taxes and business registration) create opportunities for abuse, while delays in responses on the part of tax authorities are frequently cited as a problem. Additionally, citizens of Bosnia and Herzegovina exhibit low levels of trust in judicial and other state institutions, which can further complicate the detection and prosecution of illicit activities.

5.2.2. Statistics and Data Availability

Statistical data on women's involvement in IFFs and organised crime in Bosnia and Herzegovina are not adequately disaggregated by gender. SIPA's annual reports do not contain gender-disaggregated data on offenders, accomplices and victims. While women do appear in these cases as accomplices, perpetrators and victims, the lack of gender-specific analyses impedes precise mapping of their roles. Additionally, Transparency International in Bosnia and Herzegovina reports that 80% of perpetrators in corruption cases are men, while women account for only 15% of participants. Women are more often accomplices than direct perpetrators of criminal offences. In financial crimes such as tax evasion, women are listed as responsible persons in legal entities but are often acting under the influence of male partners or family members.

5.2.3. Case Examples

Several cases collected during the research highlight the different roles women play in IFFs and organised crime:

- Tax Evasion: The head accountant of a company took responsibility for tax evasion amounting to several hundred thousand KM. Analysis suggests that emotional and material motives played the key role in her confession of guilt.
- Organised Crime: A woman led an organised criminal group involved in drug trafficking. Her case involved a shootout with the police and an escape from prison, making her a symbol of the complex roles women can play in a criminal milieu.
- Money Laundering (Family Cases): Women often act as accomplices in money laundering by acquiring property or managing financial transactions on behalf of their spouses or relatives. One case demonstrates how women frequently have key roles in financial crime, particularly in complex tax fraud schemes.
- International Recruitment for Prostitution: In cases related to human trafficking, women often appear both as victims and as organisers, further complicating the understanding of their roles in these criminal activities.

> A representative of an organisation for the protection of human trafficking victims shared with the focus group in BiH the case of a woman who had been trafficked for sexual exploitation. The woman was forced into prostitution and the money she earned was handed over to a criminal group. This case illustrates how human trafficking, as a form of IFF, can have devastating consequences for women, jeopardising their fundamental human rights.

5.2.4. Training and Institutional Cooperation

Training for relevant actors is essential to improve their understanding of the gender dimension in illicit financial flows and organised crime. However, training for police officers and judicial authorities rarely incorporates the gender perspective when addressing illicit financial flows. According to workshop participants, more educational programmes are needed to highlight how gender influences motivation and involvement in criminal activities. Furthermore, although SIPA, tax authorities and judicial institutions share responsibilities for combating IFFs, they clearly lack coordination, as well as resources such as financial experts or psychologists who could facilitate their understanding and prosecution of these cases.

5.3. Montenegro

5.3.1. Legal Framework and Challenges

Montenegro's legal framework recognises and penalises involvement in organised crime and IFFs, but does not fully incorporate the gender perspective. Amendments to the criminal legislation are ongoing, with the definition of "criminal activity" in the context of money laundering being the key issue. Challenges in tackling these crimes include insufficient institutional coordination and difficulties proving the origin of assets. While women often have passive roles, there are also cases where they play active roles, primarily in transferring assets and collecting financial resources.

5.3.2. Statistics and Data Availability

Data on women's participation in illicit finance and organised crime are not systematically collected in Montenegro. The Ministry for Human and Minority Rights does not maintain specific records on these issues. However, anecdotal evidence from courts and media reports suggests the involvement of women in criminal activities, most commonly as accomplices, perpetrators or intermediaries in financial transactions. Women from dysfunctional families and those in economic or emotional relationships with criminal structures are particularly vulnerable.

5.3.3. Case Examples

Several cases illustrate the different roles women play in IFFs and organised crime:

- Tamara Zvicer, the wife of criminal group leader Radoje Zvicer, has been actively involved in financial transactions and investments of ill-gotten funds. Although her role in criminal activities has not been proven formally, there are indications of her involvement in managing proceeds of crime.
- Female banking employees – cases of women working in financial institutions who abused their office for personal gain or in favour of criminal structures.
- Women exploited for money or drug transportation, often not fully aware of their criminal liability.
- Women's roles in online sales of goods without paying taxes and customs duties, including cosmetics, clothing and medical products.

> An interviewed representative of a Montenegrin financial institution talked about a case of a woman who played a key role in money laundering. She worked in a bank and had access to the money transfer system. Using her position, she facilitated the transfer of large sums of money to foreign accounts, concealing its origin. This case demonstrates that even women in senior positions in financial institutions can have an active and important role in IFFs.

5.3.4. Training and Institutional Cooperation

Initiatives to strengthen institutional response to illicit financial activities have been launched in Montenegro, but the gender perspective remains insufficiently integrated. Judges and prosecutors have limited capacity to recognise the roles women play in criminal activities, impeding prosecution. The Central Bank of Montenegro acknowledges the need to enhance financial oversight, particularly in relation to company ownership registration. Additionally, the Customs Administration points out the challenges women face in advancing within the sector, while also recognising their potential for strengthening financial flow monitoring. Finally, the Ministry for Human and Minority Rights funds NGO projects related to the prevention of violence against women; however, specific training on the role of women in organised crime has not been conducted.

5.4. North Macedonia

5.4.1. Legal Framework and Challenges

North Macedonia has laws on anti-money laundering and anti-corruption and relevant Criminal Code provisions incriminating IFFs. It also has regulations on the confiscation of proceeds of crime, but implementation remains a challenge.

The lack of the gender perspective in legislation and institutional mechanisms has been identified as a key issue. While women are increasingly involved in economic crime and corruption cases, their role is often minimised or overlooked during investigation and prosecution. North Macedonia lacks specialised strategies addressing the role of women in illicit financial flows. Key challenges include the absence of an institutional strategy for understanding women's roles in illicit financial flows, legal uncertainty regarding the confiscation of assets formally registered in women's names, lack of gender-disaggregated data in official statistics and non-consideration of gender dynamics in judicial proceedings.

5.4.2. Statistics and Data Availability

Statistics on women's participation in organised crime and illicit finance are limited. Available data indicate that the number of cases against women involved in organised crime in North Macedonia significantly increased between 2020 and 2024, from 14 to 51 cases. The most common offences committed by women include abuse of office (24 cases), money laundering (12 cases), child trafficking (15 cases) and unauthorised drug production. Women are less frequently identified as organisers but are often formally listed as responsible persons in high-level corruption cases. They are typically involved in money laundering cases through familial or emotional ties, with property frequently registered in their name. Another challenge arises from the institutions' inconsistent collection of gender-disaggregated data, impeding precise analyses of women's roles in these processes.

5.4.3. Case Examples

Herewith several of the identified cases illustrating the different roles women play in IFFs and organised crime:

- A senior official at the Ministry of Internal Affairs was convicted of abuse of office. Notably, she was the only high-ranking official to receive a prison sentence, while the cases against male officials were either delayed or dismissed as time-barred.
- Several cases have revealed women listed as formal owners of businesses used for money laundering, while the actual organisers were men.
- Women have frequently acted as intermediaries and organisers in cases involving prostitution and human trafficking.
- A woman was at the helm of a large-scale financial fraud scheme, strategically exploiting her gender to avoid suspicion and gain trust.

> Participants in the focus group with police representatives discussed a case in which a woman was forced to participate in financial fraud. She was blackmailed by a criminal group that threatened to harm her and her family if she refused to cooperate. She was coerced into opening a bank account and using it to transfer money obtained through fraud. This case illustrates how women can become victims of coercion and manipulation in the context of IFFs.

5.4.4. Training and Institutional Cooperation

Although there are trainings on organised crime and money laundering, specific training on the role of women in these processes is lacking. The police, prosecutors and courts do not sufficiently exchange information on the gender perspective in criminal activities. Furthermore, financial institutions and tax authorities do have certain oversight mechanisms, but they do not collect gender-disaggregated data.

5.5. Serbia

5.5.1. Legal Framework and Challenges

Serbia does not have a specific legal framework addressing the role of women in illicit financial flows and organised crime. Its legislation treats participants in criminal activities the same, regardless of their gender, and the gender perspective is not incorporated into the mechanisms for preventing and combating these crimes. According to judges and prosecutors, women most commonly act as intermediaries, accomplices or fronts in money laundering and financial crimes, particularly within families, where properties, vehicles and other valuable assets are registered in their names to conceal the origin of illicit funds.

The existing electronic system for registering statistical data does not recognise gender as a relevant category, precluding the monitoring of gender aspects related to financial crime.

5.5.2. Statistics and Data Availability

Official statistical data on women's involvement in financial and organised crime are not available. Institutions keeping records of criminal activities (police, prosecution, courts) do not keep gender-disaggregated data. Research on women's roles in these activities is almost non-existent. According to reports of the Administration for the Prevention of Money Laundering and prosecutors, women's participation in analysed money laundering typologies has not been specifically identified; rather, they are mainly listed as fictitious owners of companies and properties used to conceal the origin of the funds. Women have been identified as perpetrators of financial crimes in some cases, particularly embezzlement in banks and abuse of office, highlighting the need for a deeper analysis of their roles in these processes.

5.5.3. Case Examples

Interviews with judges and prosecutors have highlighted several key phenomena:

- In organised crime cases, women are most often the wives, mothers, or sisters of the perpetrators, with assets registered in their names to conceal the origins of illegally acquired wealth.
- In cases of embezzlement, tax evasion and abuse of office, there have been instances where women independently devised criminal schemes, using their positions in the banking sector or accounting.
- Case-law studies show that women have been charged in a money laundering case involving the Belivuk group, the Šarić drug cartel and several cases of asset transfers to avoid confiscation.
- Certain cases indicate that women are not only victims but also organisers of human trafficking networks and are particularly active in recruiting new victims.

5.5.4. Training and Institutional Cooperation

Training and education programmes on preventing financial crime do not include the gender perspective. Members of the judiciary emphasised the need for specialised training to better identify the roles of women in money laundering, organised crime and corruption. Regulatory bodies, such as the Administration for the Prevention of Money Laundering, the Anti-Corruption Agency and the Tax Administration, do not consider gender aspects relevant in financial investigations. Furthermore, while there is cooperation between prosecutors, courts and financial institutions in detecting financial crime, improvements are needed in identifying gender patterns in criminal activities.

> A judge interviewed in Serbia spoke about a case in which women were used as "money mules" to transport proceeds of crime. They travelled abroad carrying large sums of cash, which they then handed over to the members of the criminal group. This case illustrates how women can be exploited for money transfers and that many of them are unaware of the risks or consequences.

5.6. Kosovo

5.6.1. Legal Framework and Challenges

Kosovo lacks precise legal definitions for IFFs, rendering difficult the identification and prosecution of these crimes. However, the absence of the explicit term "illicit financial flows" (IFFs) does not necessarily prevent the authorities from prosecuting the underlying criminal offences. While the lack of a definition of IFFs may create terminological or conceptual gaps, the greatest challenges typically lie in law enforcement capacity, inter-institutional cooperation and available resources, rather than in the mere absence of the term. Nonetheless, reports indicate a reluctance among special prosecutors to initiate and conduct investigations in money laundering cases.[75]

Money laundering is criminalised under Article 56 of the 2016 Law No. 05/L-096 on the Prevention of Money Laundering and Combating the Financing of Terrorism. Women are rarely recognised as initiators of criminal activities in the legal system. Instead, they are mostly identified as victims or accomplices. Furthermore, women often lack awareness of their rights, making them vulnerable in matters of inheritance and property ownership. Moreover, they continue to face both practical and legal barriers in exercising their property rights, wherefore only a small share of women own or inherit property.[76] The challenges affecting women's ability to acquire property ownership include cultural, social and traditional factors, difficulties in enforcing existing laws, legal ambiguities and inconsistencies, and lengthy civil court proceedings.

Institutions such as the Kosovo Police, Tax Administration and Financial Intelligence Unit (FIU) lack the capacity and resources to conduct gender-sensitive investigations into financial crime. The absence of gender-disaggregated data further complicates the analysis and suppression of women's roles in financial crime.

5.6.2. Statistics and Data Availability

There are no official statistics on women's involvement in money laundering and organised crime in Kosovo. However, judges and prosecutors have confirmed that although women rarely act as perpetrators of criminal activities, they are frequently used to conceal financial transactions or register property acquired through criminal means.

There has been an increase in the number of women holding bank accounts since the introduction of post-pandemic child benefits by the Ministry of Finance, Labour and Transfers in 2021. This trend highlights the need to improve financial literacy among women.

75 See, e.g. KIPRED's 2016 Report, available at: https://kipred.org/wp-content/uploads/2016/03/Money-Laundering-Responses-in-Kosovo-In-Between-Policy-and-Practice.pdf.

76 See more in the USAID Property Rights Programme, "Gender, Property, and Economic Opportunity in Kosovo," 2015, available at: https://www.researchgate.net/publication/282074035_Gender_Property_and_Economic_Opportunity_in_Kosovo.

5.6.3. Case Examples

Several cases illustrate the different roles women play in illicit financial flows and organised crime:

- Court cases confirm that women are often instrumentalised to register vehicles and real estate, which are, in reality, owned by men but are used to conceal illicit proceeds.
- There had been cases where women were convicted of money laundering, but the verdicts were later overturned by higher courts.
- Manipulations of property valuation to avoid taxation and conceal the true value of transactions have been identified in the real estate sector.
- Notaries have reported cases where women signed documents without understanding the consequences, leading to the loss of property or legal complications.

> Participants in the focus group discussion with CSO representatives mentioned a case in which a woman became a victim of an investment fraud. She had invested money in a company that promised high returns, but it turned out to be fraudulent. This case illustrates how women can be particularly vulnerable to financial scams, especially if they lack knowledge of financial markets and investments.

5.6.4. Training and Institutional Cooperation

Ongoing financial crime training programmes are not gender-sensitive and there is a recognised need for specialised training addressing the role of women in these processes. The FIU, the Tax Administration and the Kosovo Police rarely conduct gender-focused analyses. Recommendations from workshops with the judiciary and financial institutions highlight the need for more frequent and in-depth training sessions on the gender dimension of financial crime, for incorporating international experiences and best practices into domestic legal and financial institutions, and for improving coordination between the FIU, the Tax Administration and the judiciary in monitoring suspicious transactions.

6. KEY FINDINGS CONCERNING THE WESTERN BALKANS

6.1. Role of Women in Illegal Financial Flows (IFFs)

The research highlights the complex and multifaceted roles of women in illicit financial flows in the Western Balkans. Women are perpetrators, accomplices, victims, organisers and witnesses, depending on their social and economic status and their environment. These roles often remain invisible to judicial and financial institutions due to deeply rooted gender stereotypes and lack of capacity to recognise gender patterns in criminal activities.

6.1.1. Women as Perpetrators

Women appearing as perpetrators in IFFs often take on roles requiring administrative or legal skills. They may be formally registered as owners of companies used for money laundering or responsible for forging documents and concealing financial transactions. Rather than wielding actual control over operations, they serve as a "protective buffer" for male network leaders. In some instances, however, women may be directly involved in criminal activities, such as in transferring money or smuggling goods.

- **Example from Kosovo**: Cases have been registered in Kosovo where women were used as formal business owners for money laundering purposes, as male criminals transferred assets or businesses to their wives to avoid suspicion.
- **Example from Serbia**: A Belgrade woman managed the administration of a company involved in international transactions linked to tax evasion. Although she was formally the director, her activities were strictly limited to executing orders from a criminal group.

6.1.2. Women as Accomplices

Women acting as accomplices in IFFs provide logistical support to criminal groups. They can act as money mules or messengers, provide shelter or transport for members of criminal groups, or perform other tasks facilitating criminal operations. Criminal networks often exploit women for such tasks, assuming they will attract less attention of the authorities.

- **Example from Montenegro**: In Nikšić, a case was uncovered where women transported cash between network members, using private cars to avoid detection. Their role was crucial for maintaining the network's financial stability but remained unrecognised in judicial proceedings.
- **Example from Kosovo**: Two women were engaged in running fake accounting firms that concealed money flows between criminal group members. Their roles were identified only after a thorough financial audit.

6.1.3. Women as Victims

Women are often victims of human trafficking, sexual exploitation and other forms of violence associated with IFFs. They may be forced into prostitution, made to work under inhuman conditions, or coerced into participating in criminal activities. Their status as victims further complicates judicial processes, as they often face stigma and lack support.

- **Example from North Macedonia**: A group of women from rural areas was forced to participate in international financial fraud through fake online transactions. The organisers used the women's personal data to open bank accounts, while simultaneously threatening them with violence. They used the accounts to transfer fraudulent funds. The women were treated as account holders without a deeper analysis of their motivations or coercion. They were prosecuted as direct participants in the crime, which impeded their access to justice. Banks reported suspicious transactions, but regulatory bodies failed to conduct further gender-sensitive analyses. The lack of gender-disaggregated data further impeded the investigation.

- **Example from Bosnia and Herzegovina**: A woman, who was a victim of human trafficking, was forced to smuggle cash across the border under threat of her family's deportation. Her testimony later played a crucial role in dismantling the network.

- **Example from Montenegro**: A smuggling network that used women as money mules to transport cash between members was discovered in Podgorica. Two women were arrested during one operation when they attempted to carry €100,000 across the border. They were prosecuted as logistical accomplices, while the network's organisers remained beyond the reach of the law. The verdicts did not consider the possibility of coercion. The police had registered the case but failed to conduct a deeper investigation into how the women were involved in the network. The lack of gender-sensitive protocols made it difficult to identify potential signs of coercion.

6.1.4. Women as Leaders or Organisers of Criminal Groups

Although less common, women can also hold leadership roles in criminal groups engaged in IFFs. They can be the organisers, financiers or operation leaders. This role is often linked to specific skills and expertise, such as financial literacy, knowledge of laws and regulations, or the ability to manipulate and persuade.

- **Example from Albania**: A woman led a criminal group involved in drug trafficking. She managed procurement, transport and distribution, as well as the group's finances. This case challenges the stereotype that women are always passive victims or merely accomplices in criminal activities.

- **Example from North Macedonia**: A woman devised and ran an investment fraud scheme. She convinced a large number of people to invest money in a fraudulent company, promising them high returns. This case demonstrates that women can be highly skilled in manipulation and deception and can play leading roles in complex financial schemes.

6.1.5. Women as Witnesses

Women can also serve as witnesses to IFFs, either because they personally observed criminal activities or possess information about them. Their testimonies can be crucial in exposing criminal groups and prosecuting the perpetrators. However, female witnesses often face threats and intimidation, which can discourage them from testifying.

- **Example from Serbia**: A woman, who had been a victim of trafficking, was the key witness in a case against an organised crime group involved in human trafficking. Her testimony was vital for convicting the group's members. However, she faced numerous threats and pressures to withdraw her testimony. This case illustrates the importance of witness protection, particularly for women, who are often subjected to additional risks due to gender stereotypes and power imbalances.

- **Example from Bosnia and Herzegovina**: A woman working as an accountant in a company noticed suspicious financial transactions and reported them to the authorities. Her testimony led to an investigation and the uncovering of a money laundering scheme. This case highlights that women not directly involved in criminal activities can also play an important role in uncovering IFFs.

6.2. Factors Defining the Roles of Women in Illegal Financial Flows

The roles of women in IFFs in the Western Balkans are shaped by complex social, economic and cultural factors. The analysis of these factors reveals deeply rooted gender stereotypes, economic dependence, family dynamics and other factors often forcing women to participate in criminal activities. Understanding these factors is crucial for designing effective policies addressing the gender dimension in the fight against IFFs.

6.2.1. Economic Dependence

Women's economic dependence on their partner or family is one of the most significant factors influencing their involvement in IFFs. Women, who are unemployed or work in the informal sector, often face pressure to generate additional income, even if it involves illegal activities. This dependence is further exacerbated in cases where women are victims of economic abuse or are denied fundamental economic rights. Lack of economic opportunities and limited access to education also exacerbate women's financial dependence, rendering them more vulnerable to exploitation in the context of IFFs.

- **Example from Bosnia and Herzegovina**: A widow without regular income, who was living in a rural area, was forced to distribute illegal cigarettes in her local community to provide for her children. Her involvement in the criminal network was driven by economic insecurity and lack of alternative employment options.

- **Example from North Macedonia**: A young woman in Skopje was persuaded by a criminal group to participate in money laundering, lured by promises of high earnings. Her economic hardship and debts to local lenders were the key reasons for her involvement.

- **Example from Kosovo**: Women were pressured or convinced to register properties and businesses in their names to shield male relatives from financial scrutiny. This practice was particularly prevalent in real estate transactions, where women were often unaware that they were participating in money laundering schemes.

6.2.2. Gender Stereotypes

Deeply ingrained gender stereotypes, portraying women as "less suspicious," "passive," or "non-aggressive", further shape their roles in criminal networks. Criminal groups often exploit these stereotypes to conceal their activities and evade law enforcement scrutiny. Women may be perceived as less capable of organising and leading criminal operations, making them "ideal" for carrying out specific tasks such as transferring

money, storing information, or recruiting new victims. These stereotypes can lead to an underestimation of women's involvement in IFFs, making it harder to prevent and combat such activities.

- **Example from Montenegro**: A woman smuggled drugs between Nikšić and Podgorica as the criminal group believed that police were less likely to check the vehicle if she was driving it. During interrogation, police tended to overlook her role, assuming she was merely a "passive accomplice."
- **Example from Albania**: A criminal network that used women to transport cash between companies was uncovered in Tirana. Their role was disguised by seemingly legitimate transactions, allowing them to evade suspicion from financial regulators.

6.2.3. Family Ties

Family connections play an important role in involving women in IFFs, either through direct pressure, bribery or threats, or socialisation normalising criminal activities. Women often find themselves caught between family loyalty and the law, which can lead to legal repercussions. In some cases, women may be forced to participate in IFFs to protect themselves or their families from violence or other threats. However, family ties can also serve as a protective factor, especially when families support women who are victims of IFFs.

- **Example from Serbia**: In a case in Novi Pazar, a woman knowingly took on administrative duties for a family business involved in illicit money transfers abroad. Although aware of the illegal aspects of the job, she felt obligated to her family and was financially dependent on them.
- **Example from Kosovo**: A young woman from a rural community was forced to use the family business for money laundering. Her brother, the leader of a criminal network, threatened her with ostracism if she refused to cooperate.

6.2.4. Cultural and Social Factors

Cultural and social factors, such as traditional gender roles, patriarchal patterns and the normalisation of violence, create fertile ground for the exploitation of women in illicit activities. These factors can limit women's access to education, employment and other resources, making them more vulnerable to exploitation and involvement in IFFs. In addition, traditional expectations, such as the women' role of family caregivers, are sometimes manipulated within criminal networks.

Social norms relegating women to secondary roles in relation to men can render them "invisible" to authorities, facilitating their involvement in IFFs. Furthermore, culturally acceptable behavioural patterns can mask women's roles in IFFs and complicate their identification and prosecution.

Moreover, the media play an important role in shaping perceptions of women in criminal activities, including IFFs and organised crime. The way women are portrayed in the media can influence their decision to engage in illegal activities, whether through the normalisation of criminal behaviour or stereotypical depictions marginalising them or presenting them as passive participants or victims. In some cases, the glamorisation of criminal networks and their actors in the media can lure women into IFFs, particularly in settings with limited economic opportunities. Conversely, responsible journalism can play a crucial role in preventing IFFs by exposing gender patterns of crime and raising awareness of the negative consequences of criminal activities.

Similarly, the role of religious communities in IFFs is complex and requires further investigation. In some cases, religious communities may be exploited by criminal groups for money laundering or terrorism financing.

In other cases, religious leaders may play an important role in preventing and combating IFFs whilst promoting ethical values and financial transparency. It is, therefore, necessary to examine the role of religious communities in each Western Balkan country and develop strategies for collaboration with religious leaders in the fight against IFFs.

- **Example from Bosnia and Herzegovina**: A Sarajevo woman led a local smuggling network, using her position as the "family matriarch" to organise logistical support. Her role remained invisible to the police until intercepted communications revealed her direct involvement.
- **Example from North Macedonia**: An elderly woman from Tetovo was engaged in negotiations with local officials to facilitate the smooth transport of illegal goods. She used her reputation and the respect she commanded in the community to deceive the authorities.
- **Example from Kosovo**: Lack of oversight of religious communities in Kosovo has facilitated the involvement of women in IFFs. Some religious groups wield significant influence over local communities, which can be exploited to conceal illegal financial activities. Religious leaders can persuade women to participate in money laundering or terrorism financing, framing it as an act of faith or charity.

6.3. Institutional Perceptions and Responses

Western Balkan institutions, including judicial systems, law enforcement and financial regulatory bodies, often fail to recognise the role of women as active participants in IFFs. Their perceptions, shaped by societal stereotypes and limited capacity to analyse gender patterns, have resulted in their inadequate response to the specific roles women play in criminal networks. The absence of gender-sensitive policies and training further complicates the identification and prosecution of women involved in IFFs.

6.3.1. Judiciary and Police

The judicial and police systems in the region largely overlook the gender dimensions of crime, focusing on men as the dominant actors in organised crime networks. This leads to situations where women are treated solely as "passive accomplices" or "victims," even when evidence suggests their active involvement. Such an approach can have serious consequences, as women may face unfair sentences or be denied access to justice and support. Moreover, neglecting the gender aspects of crime can impede the identification and dismantling of criminal networks, since women's roles within these groups may be overlooked.

- **Example from Montenegro**: A police investigation into an organised criminal group included a woman responsible for transferring cash across borders. Her role was downplayed as "insignificant" during the trial, despite communication records showing that she was a key intermediary between network members. The lack of gender analysis contributed to her lenient sentencing, while male members of the group received harsher penalties.
- **Example from Bosnia and Herzegovina**: The police in Sarajevo overlooked the role of women in shell companies used for money laundering. The investigation focused on male company founders, while women listed as business owners were treated merely as "cover", without deeper scrutiny of their liability.

- **Example from Albania**: A criminal network using shell companies for money laundering was revealed in Tirana. A woman, formally registered as the owner of a construction company, played a key role in concealing financial transactions. The company had minimal real activity, while large sums of money flowed in from illicit sources linked to drug trafficking. She was prosecuted as an accomplice but received a lighter sentence compared to the male members of the network. The court did not take into account her economic and social status when passing judgment. The investigation focused on the company's financial transactions, without analysing the gender aspect. Her role as the formal owner was treated as "technical," without deeper assessment of her accountability.

- **Example from Serbia**: A case was uncovered In Belgrade in which a woman was responsible for the administration of fraudulent projects in an IT company. The company used these projects to launder money from other criminal activities. The woman was prosecuted as an administrative assistant, while the organisers of the network received harsher sentences. Her role was minimised, allowing the network to continue operating through other members. The judicial authorities did not investigate the broader network to identify the real power wielders in the organisation.

- **Example from North Macedonia**: A woman used her position in the judicial system to cover up illegal financial activities. She was working in a court and had access to confidential information, which she used to help a criminal group evade investigation.

6.3.2. Financial Institutions

Financial regulators and banks across the Western Balkans also rarely apply gender-sensitive approaches in their operations. This enables criminal networks to use women as formal account holders or business owners, which makes it harder to track the real participants in IFFs. Lack of gender-sensitive policies and procedures within financial institutions may lead to unfair suspicion of women or denying them access to financial services. Additionally, it may complicate efforts to detect and prevent financial fraud and other financial crimes linked to IFFs.

- **Example from Serbia**: A bank reported a series of transactions involving female account holders with unusual money flows. However, regulatory bodies did not conduct further investigations due to lack of personnel trained in analysing gender patterns. It was later discovered that the accounts were being used to launder money connected to drug trafficking.

- **Example from North Macedonia**: A financial institution identified irregularities in transactions from accounts registered to women, but these transactions were classified as "low priority" due to the absence of a system for recognising potential gender patterns in criminal activities.

- **Example from Kosovo**: Financial institutions lack gender-sensitive analysis in their anti-money laundering procedures. Furthermore, legal loopholes allow the registration of businesses and luxury assets in the women's names although they are actually controlled by male criminal figures.

6.3.3. Institutional Perceptions of Women

The analysis of institutional perceptions of women in IFFs in the Western Balkans reveals several dominant patterns substantially impacting the effectiveness of judicial and regulatory responses. These patterns expose deeply rooted biases and structural weaknesses precluding a comprehensive analysis and response to the gender component in criminal networks. Some of these patterns include the underestimation of women's roles, lack of proper training to identify gender-specific patterns in criminal networks, prevailing stereotypes portraying women as passive or less capable of criminal activities, and the absence of gender-sensitive policies ensuring fair treatment and support for women who are victims of or disproportionately affected by IFFs.

6.3.3.1. Underestimation of Women's Roles

Institutions at all levels frequently dismiss the possibility of women playing active or key roles in IFFs. Police reports and judicial proceedings rarely include a detailed analysis of women's roles, even when evidence suggests substantial involvement. This practice stems from the prevailing perception that women are "less capable" of organising and executing criminal operations, which leads to superficial investigations.

- **Example from Bosnia and Herzegovina**: In a money laundering case linked to the construction industry, the investigation focused on men who controlled the companies. Although women were formally registered as business owners and executive directors, their responsibility was not investigated because they were considered mere "fronts" without real involvement. This approach impeded efforts to identify their actual tasks within the network.
- **Example from Serbia**: An investigation of drug smuggling did not cover women acting as logistical coordinators because their tasks were described as "secondary." This case highlights the problem of institutional neglect of female roles contributing to the functioning of criminal networks.

6.3.3.2. Lack of Adequate Training

Police officers, prosecutors and judges often lack proper training to recognise gender-specific patterns in criminal networks. Consequently, they tend to view women through stereotypical roles (victims or accomplices), making it harder to identify the more complex roles they assume.

- **Example from Montenegro**: An anti-money laundering training for the police did not cover the gender dimension. In result, cases where women played logistical and operational roles in IFFs remained underexplored. In one case, a woman managing transactions between banks was treated as a mere "operative" without an analysis of her involvement in the broader network.
- **Example from Kosovo**: A woman who opened several accounts for transactions on behalf of a criminal group was qualified as an "accessory" because the prosecution lacked a methodology to assess her real contribution.

6.3.3.3. Prevailing Stereotypes

Gender stereotypes substantially influence perceptions of women in criminal activities. Women are often assumed to lack the "skills" necessary to lead networks, which is why they are frequently marginalised in institutional reports and prosecution.

- **Example from North Macedonia**: A police investigation into human trafficking uncovered a network in which women were responsible for financial transactions and record-keeping. Despite this, their role was presented in reports as "supporting," while men were identified as the key actors.
- **Example from Albania**: A woman responsible for communication between local and international network members in drug smuggling cases was labelled a "secondary figure" because it was assumed that men made all the key decisions.

6.3.3.4. Absence of Gender-Sensitive Policies

Women coerced into participating in IFFs are often not recognised as victims, rendering difficult their access to support and justice. Rather than receiving protection, these women are prosecuted as perpetrators due to the lack of gender-sensitive policies.

- **Example from Serbia**: A woman, whose partner had forced her to participate in financial fraud under threat of violence, was prosecuted as an accomplice, without consideration of her situation as a victim of domestic abuse.
- **Example from Bosnia and Herzegovina**: A migrant woman, trafficked and forced to smuggle cash, was not identified as a victim because institutions lacked protocols for recognising such cases.

These patterns highlight the urgent need for institutional reform and staff training to improve awareness of gender aspects of criminal activities. Without a shift in perceptions of women in IFFs, their roles will continue to be underestimated, further weakening the capacity to combat organised crime effectively.

6.4. Lack of Resources

The fight against IFFs in the Western Balkans faces significant resource constraints, both at the international and national levels. These limitations particularly affect the institutions' ability to recognise and address the gender dimension of criminal activities. The key challenges were identified in the areas of statistical data collection and training for relevant institutions.

6.4.1. Statistical Data

The lack of gender-disaggregated data on IFFs is the crucial challenge in research and policymaking. National statistics and reports of regulatory bodies primarily provide aggregated data failing to recognise the roles women play in illicit activities. Without such data, institutions lack a clear picture of the scale and nature of women's involvement in criminal networks, making it difficult to develop targeted and effective policies.

- **Example from Serbia**: The national anti-laundering agency reported over 15,000 suspicious transactions in the previous year, yet the data on the gender of the account holders were unavailable. A subsequent investigation revealed that at least 20% of these accounts were registered in women's names, many of whom were formal business owners linked to criminal groups.
- **Example from North Macedonia**: None of the reports developed during a three-year analysis of financial fraud contained data on the gender of the criminal participants. This lack of information further complicated the identification

of specific patterns of women's involvement, particularly in money laundering and human trafficking.

At the regional level, most statistical reports focus on the type of criminal activity (e.g., smuggling, money laundering) without taking into account gender aspects. This indicates systemic neglect of gender analysis in the financial sector and judicial institutions.

6.4.2. Training and Education

Institutions across the Western Balkans face a shortage of specialised training and resources for recognising the gender component in IFFs, which hinders the development of strategic capacities for analysing and prosecuting cases in which women play key roles.

- **Example from Bosnia and Herzegovina**: Judges and prosecutors had no access to training that would help them understand the socio-economic factors influencing women's roles in criminal networks. As a result, women were prosecuted as accomplices, even in cases where evidence suggested they had been coerced into participation.
- **Example from Montenegro**: Police training focusing on combating money laundering did not include modules on the gender-specific aspects of crime. Consequently, women involved in money laundering through shell companies were treated solely as nominal business owners, without an analysis of their actual roles. One case involved a woman managing financial transactions for a cigarette smuggling network, but her responsibility was not thoroughly investigated.
- **Example from Kosovo**: Research has shown that regulatory bodies lack training to identify transaction patterns involving female account holders. This lack of capacity resulted in slow responses to reports of suspicious transactions, allowing criminal groups to continue their operations.

6.4.3. Insufficient Coordination and Cooperation in the Region

Institutional weaknesses in Western Balkan countries are further exacerbated by lack of coordination among them. While international organisations such as FATF and UNODC advocate integration of the gender perspective in crime analysis, implementation of their recommendations at the regional level remains limited. Lack of financial resources and training is particularly challenging for smaller countries in the region, where the institutions are often overburdened with basic operations.

- **Example from Albania**: Research found that only 10% of the National Anti-Corruption Agency budget was allocated to IFF analysis, while gender aspects were entirely overlooked. This made it difficult to identify women acting as intermediaries in corruption-related networks.
- **Example from North Macedonia**: Lack of regional cooperation led to missing key data in a transnational money laundering case, in which women from a number of countries were involved as formal account holders.

7. CONCLUDING OBSERVATIONS

IFFs are not only an economic problem but a social challenge that deepens inequalities and undermines gender equality as well. This problem is further exacerbated in the Western Balkans by specific socio-cultural norms, economic insecurity and weaknesses in institutional responses. This research provided comprehensive insight into the gender dimension of IFFs, identifying key challenges and opportunities for improving policies and practices in the region.

7.1. The Complex Role of Women in IFFs

The research findings show that the role of women in IFFs is far more complex than often assumed. Women are far from being merely passive victims; they are active participants in various forms of financial crime, including money laundering, financing of terrorism and even the organisation of criminal activities. This research has shown that factors - such as gender inequality, poverty, gender-based violence and limited access to education and economic opportunities - are key drivers pushing women towards involvement in these illicit activities. Their marginalisation, economic dependence and social stereotypes make them particularly vulnerable, but also instrumentalised by criminal networks. The finding that many women are coerced into participating in illegal activities under threat or duress by their partners or other family members is particularly concerning. This form of exploitation, frequently accompanied by physical, psychological and economic abuse, further exacerbates their status and limits their ability to break free from the criminal milieu.

Women play diverse roles in IFFs, from passive accomplices to key operatives and even leaders of criminal groups. The research reveals that they are often registered as formal owners of shell companies or account holders to obscure financial trails of criminal networks. Their roles frequently remain unrecognised due to stereotypical perceptions portraying them as "less suspicious" or "passive participants." However, cases across the region highlight the need for deeper analysis. Women in Albania were formally registered as owners of construction companies used for money laundering, while in Montenegro, they were responsible for cash transfers and coordinating local transactions. Cases in which women were coerced into financial fraud under threats of violence were identified in North Macedonia and Serbia.

7.2. Factors Shaping Women's Roles

IFFs in the Western Balkans are deeply rooted in a specific socio-cultural context. Traditional gender roles, patriarchal patterns and the normalisation of certain forms of violence create fertile ground for the exploitation of women in illicit activities. In-depth analysis identified key factors leading to women's involvement in IFF. Economic insecurity, gender stereotypes and family pressures stand out as the most significant. Women who are unemployed or working in the informal sector are often forced to engage in criminal activities to make ends meet.

Gender stereotypes further complicate the situation. Criminal groups exploit perceptions of women as "less suspicious" to conceal financial trails or facilitate operations. These stereotypes are precisely the reason why women across the region are frequently account holders or company owners, while men remain the actual controllers. Family ties and social norms also play an important role. In Serbia and Kosovo, women were forced to participate in IFFs through family businesses, often under threat of social isolation or violence. This underscores the need for specific policies addressing this dimension of crime.

7.3. Lack of Data and Institutional Responses

Institutions in the region face serious challenges in recognising and processing gender aspects of criminal activities. The police and judicial systems rarely incorporate gender analysis into their investigations, which results in the unfair treatment of women in legal proceedings. Unfortunately, the lack of reliable data on women's involvement in IFFs is a major obstacle to understanding the true scale of the problem and devel-

oping effective policies to address it. This research is therefore of crucial importance as it contributes to a better understanding of the issue and provides a basis for further investigation and action.

The research has shown the insufficient sensitivity of the laws and institutions to the gender-specific aspects of IFFs. The countries in the region have to improve their legislative frameworks and strengthen the capacities of law enforcement, judicial authorities and financial institutions in order to combat financial crime more effectively, whilst taking into account the gender dimension.

7.4. Lack of Resources

The research has identified serious gaps in resources for combating IFFs, particularly in terms of statistical data and training. National statistics in the region rarely collect gender-disaggregated data, making it difficult to analyse patterns of women's roles in criminal networks. The situation is further complicated by the lack of training. Police often ignore the roles of women as key actors in their reports, while financial institutions rarely analyse transactions from the gender perspective. For example, women managing transactions between local and international members of a criminal network in Montenegro were treated as "secondary figures," although evidence suggested that they played a central role.

Financial and regulatory institutions also suffer from lack of capacity to analyse transactions involving gender patterns. This enables criminal groups to use women as key actors without fear of detection. Regional cooperation remains underdeveloped, further hindering joint efforts against transnational criminal networks.

7.5. Prevention, Cooperation and Future Research

Western Balkan jurisdictions need to invest not only in repressive measures, but also in preventive measures, such as financial education, women's empowerment and public awareness of the risks associated with IFFs. They should, notably, empower women to recognise and report suspicious activities without fear of retaliation. Success in combating IFFs requires strong cooperation between governments, civil society, the private sector and international organisations. Only through joint efforts can an environment be created in which women are not forced into criminal activities and have equal opportunities to achieve their full potential.

The research also emphasises the need to strengthen cross-border cooperation, keep up with emerging technologies and combat corruption. In the long term, the education and empowerment of women are crucial for the prevention of IFFs. It is also vital to establish gender-sensitive rehabilitation and reintegration programmes for women who had been involved in IFFs. Although this research has provided valuable insights, it is important to note that it was limited to a specific sample and context. Future research should focus on a deeper analysis of specific forms of financial crime involving women, as well as on the development and evaluation of prevention and victim support programmes.

The research findings clearly indicate the need for a thorough reform of institutional practices and policies that will integrate the gender perspective. Standardising data collection, introducing specialised training and improving regional cooperation are key steps for progress. Integration of the gender dimension into the fight against IFFs will not only contribute to greater justice for women who are victims of and participants in these processes, but will also significantly enhance the effectiveness of the judicial and regulatory systems.

8. RECOMMENDATIONS

The recommendations for improving the fight against IFFs in the Western Balkans are based on the research findings and are structured into four key areas:

1) recommendations for legislators and policymakers; 2) recommendations for law enforcement and judicial authorities; 3) recommendations for the financial sector, its regulatory bodies and civil society; and 4) recommendations for donor organisations on the best ways to integrate a gender-sensitive approach into future projects on illicit financial activities and/or organised crime in the Western Balkans. These recommendations aim to enhance institutional capacities, resources and policies, with particular focus on the gender dimension.

8.1. General Recommendations

8.1.1. Recommendations for Legislators and Policymakers

- **Strengthen the Legislative Framework:**
  - Revise regulations, including but not limited to those of the relevant regulatory bodies, to ensure they adequately address gender-specific manifestations of money laundering and terrorism financing. For example, this could include recognising ways in which women may be coerced or manipulated into participating in these activities or how gender roles may be exploited to conceal IFFs.
  - Identify and eliminate all legal gaps allowing violence against women to go unpunished. For instance, in many legal systems, economic abuse is not explicitly recognised as a form of violence against women, making it difficult to prosecute cases where women are forced into financial dependence, tricked into taking on debt or denied access to common resources.
  - Establish mandatory verification mechanisms to identify the true owners of properties and businesses formally registered in women's names.
  - Legally mandate independent valuation of property before finalising transactions in which the buyer is a woman.
  - Legally mandate gender equality training for all judges, prosecutors and police. The training should cover topics such as gender bias and stereotypes and discrimination, as well as how they manifest in practice.

- **Develop National Strategies:**
  - Ensure the gender mainstreaming of all strategic documents, including national strategies and action plans on combatting IFFs, to ensure that the gender perspective is taken into account at all stages of planning and implementation.
  - Provide expert support to institutions and organisations combating IFFs to enhance their capacity to recognise and address gender-specific aspects of IFFs.
  - Strengthen cooperation between different stakeholders, including judicial authorities, financial institutions and their regulatory bodies, civil society and international organisations, to ensure a comprehensive and coordinated response to IFFs.
  - Consult with civil society organisations focussing on women's rights and victim support when developing strategies. A comprehensive and effective strategy should cover, inter alia, the following key areas and sectors: gender-based violence, women's economic empowerment, human trafficking and exploitation, legal aid and access to justice, criminal networks and economic crime.

- Financial regulators should develop specific mechanisms to detect and prevent financial extremist activities via bank accounts owned by women.
- Regularly monitor and evaluate the implementation of strategies and publish progress reports, which must include the gender perspective.

- **Collect Data:**
  - Ensure systematic and standardised collection of data on women's involvement in illicit financial flows to enable a better understanding of their roles in IFFs and to inform the development of effective policies.
  - The data should cover: victims (initial contact with the criminal group, personal relationships and chronic vulnerabilities); perpetrators (behaviour including recruitment, duration of involvement and committed crimes, personal relationships and chronic vulnerabilities); law enforcement officers/authorised officials (composition of investigative teams, role within the team, gender-sensitive training, pressures due to involvement in organised crime cases, attacks on the individual, property or family members due to their involvement in these cases); judges (gender-sensitive training, involvement in organised crime cases, sentencing guidelines used, pressures due to involvement in organised crime cases, attacks on the individual, property, or family members due to their involvement in these cases).
  - Banks and financial regulators should be required to monitor and analyse gender-disaggregated data on suspicious transactions.
  - Use the collected data to develop detailed profiles of women involved in IFFs, taking into account various situational models of committed crimes and specific risk factors and motivations. The analysis should cover profiles of the identified women, including those formally registered as owners of companies serving for money laundering, women acting as accomplices in transferring illicit funds, women who are victims of coercion and economic abuse within criminal networks and cases where women took on leadership roles in organised crime. Based on these patterns, develop gender-specific typologies of money laundering and other forms of financial crime to improve the identification of these activities, advance investigations and design more effective prevention and intervention strategies.
  - Conduct research on the impact of gender norms and stereotypes on women's involvement in IFFs to be used in data collection efforts.

- **Organise Campaigns:**
  - Organise campaigns targeting women of different age groups, socio-economic statuses and education levels, with particular focus on women from vulnerable groups.
  - The campaigns should also target the broader public to change perceptions and raise awareness of this issue.
  - Mount special campaigns targeting decision-makers in government, the judiciary and the financial sector to promote the adoption and implementation of policies taking the gender dimension into account.
  - The campaigns should raise awareness of the different roles women play in illicit financial flows, including as victims, accomplices, witnesses and organisers, to dismantle gender stereotypes portraying women as passive victims or less capable of crime. The campaigns should highlight the serious consequences of IFFs and organised crime for individuals and society as a whole.
  - The campaigns should promote preventive measures such as financial education, women's empowerment and strengthening mechanisms for reporting suspicious activities.

- **Conduct Further Research:**
  - Collect more information about the experiences of women victims of IFFs to enable a better understanding of the impact of IFFs on women and help design more effective support programmes.
  - Investigate the factors influencing the perceptions and treatment of women in the judicial system in the context of IFFs. Analyse how these perceptions and legal outcomes vary depending on the women's roles (victim, participant, etc.) and how they impact the effectiveness of measures for the prevention and suppression of IFFs.
  - Examine the role of religious communities in IFFs in each of the Western Balkan countries. Develop strategies for cooperation with religious leaders in preventing and combating IFFs, whilst promoting ethical values and financial transparency.

8.1.2. Recommendations for Law Enforcement and Judicial Authorities

- **Provide Capacity Building and Training:**
  - Develop specialised training for staff of institutions involved in the investigation and prevention of IFFs to ensure that officials understand the gender and cultural contexts shaping women's roles in financial crime. The training should include an analysis of the social factors influencing women's vulnerabilities, the barriers they face when reporting or exiting criminal networks and how gender stereotypes can impact how they are perceived and treated in the judicial system.
  - Introduce mandatory training for law enforcement officers on recognising and understanding the specific ways in which women may be involved in IFFs. The training should cover identified typologies, while Case Examples based on these typologies should enable officers to better understand complex situations and develop differentiated approaches in investigations, prosecution and provision of support to women involved in IFFs.
  - Organise study visits to countries with well-developed systems for combating human trafficking and gender-based violence.
  - Regularly update training programmes to include new trends and challenges in this field.
  - Build the capacities of judicial authorities and financial institutions to monitor and analyse financial flows involving use of new technologies, such as cryptocurrencies and the Internet, with particular focus on their specific misuse. Training for employees in these institutions should include recognising typologies where women appear as key actors in the digital financial environment - whether as nominal owners of digital wallets and companies used for money laundering, intermediaries in cryptocurrency transfers, victims coerced into using their identities to open accounts and conduct transactions, or participants in online fraud and financial abuse.
  - Develop specialised investigative methods and control measures in the digital space taking into account how gender patterns of criminal activities adapt to technological changes.

- **Improve Judicial Practices:**
  - Develop judicial practices that reflect an understanding of the gender dimension of crime, whilst ensuring fair treatment of women who are victims of IFFs or disproportionately affected by them.
  - Promote best judicial practices by launching a regional legal bulletin.

- **Enhance Cooperation:**
  - Organise joint training sessions and workshops for representatives of law enforcement agencies, judicial authorities and civil society organisations.
  - Develop protocols for cooperation between judicial authorities, police, financial institutions and civil society organisations in identifying and protecting victims of financial crime, particularly women who had been forcibly involved in IFFs.
  - Establish effective mechanisms for information sharing and coordination between judicial authorities, police, financial institutions and civil society organisations to improve the recognition and prosecution of cases where women are involved in IFFs. These mechanisms could include operational task forces, early identification and data exchange systems, etc.
  - Form intersectoral working groups including representatives of the judiciary, financial institutions, civil society and relevant international organisations to exchange information and coordinate policies.

- **Specialised Units:**
  - Ensure that specialised units have adequate resources and training to effectively carry out their tasks.
  - Include representatives of civil society organisations in the work of specialised units.

8.1.3. Recommendations for the Financial Sector and Civil Society

- **Raise Awareness:**
  - Utilise various communication channels (social media, websites, print materials) to reach out to as many people as possible, with particular focus on raising awareness of gender-specific patterns of financial crime.
  - Organise competitions and other interactive activities to increase engagement and interest in this topic, especially among young people and employees in the financial sector.
  - Involve public figures, influencers and financial crime experts in awareness campaigns on financial system abuse and ways to prevent it.
  - Introduce training for financial sector employees on gender equality and recognising gender aspects of financial crime.

- **Strengthen Control:**
  - Regularly update risk assessment procedures in line with new trends and typologies of money laundering, including gender dimensions in the evaluation of financial transaction risks.
  - Improve the system for registering and monitoring beneficial ownership of companies, with particular focus on identifying structures that may be exploited to conceal IFFs and misuse of women's identities as nominal owners. This process should be aligned with AML legislation.
  - Conduct internal audits and gender-sensitive analyses of transactions to ensure that procedures are consistently applied and that gender-specific patterns of financial crime are adequately recognised.
  - Introduce a reward system for employees who report suspicious activities to encourage more active participation in detecting abuse.
  - Ensure gender-disaggregated statistical data on suspicious transactions and reported cases.

- **Extend Support to Victims:**
  - Ensure that victims have access to free legal aid and psychological counselling, with focus on economic empowerment programmes enabling them to escape financial dependence and criminal networks.
  - Develop specialised rehabilitation and reintegration programmes for victims through economic empowerment, employment and mentorship.
  - Advocate the introduction of compensation mechanisms for victims, particularly those who have been forcibly involved in illegal financial flows or have suffered financial losses due to the misuse of their identity.

8.1.4. Recommendations for Donor Organisations

- **Apply a gender-sensitive approach:**
  - Focus on projects aimed at strengthening women's legal and financial literacy, as well as those promoting female leadership in the financial sector.
  - Organise gender equality training for employees of donor organisations.
  - Incorporate gender indicators into project monitoring and evaluation mechanisms.
  - Support research on the impact of projects on gender equality.
- **Extend support to local organisations:**
  - Extend long-term financial support to local organisations.
  - Offer mentoring support and capacity training to local organisations.
  - Include local organisations in project selection decisions.
- **Conduct monitoring and evaluation:**
  - Use qualitative and quantitative methods for project monitoring and evaluation.
  - Involve representatives of local organisations in the monitoring and evaluation process.
- **Share knowledge and experience:**
  - Organise regional forums in the form of conferences and workshops for exchanging knowledge, experiences and data on the role of women in IFFs, enabling the sharing of good practices in the region.
  - Create online platforms for information and resource exchange.

8.1.5. Programmatic Recommendations for the UK Government

- **Develop capacities of the programme and project teams to apply gender-sensitive approach to development assistance.**
  - Establish a Resource Centre to provide knowledge and support throughout programme and project design, implementation, and evaluation.
  - Ensure the Resource Centre includes a multidisciplinary team of gender experts, programme/project managers, and regional and thematic specialists.
  - Develop and implement capacity-building activities to familiarise programme and project teams with gender mainstreaming principles, sector-specific needs, and best practices.
  - Position the Resource Centre as a knowledge hub to facilitate learning across projects, inform government policies, and engage with other donors.

- Conduct topic-specific research and develop policy papers to deepen understanding and ensure the sustainability of gender initiatives.
- Collect and share lessons learned and best practices to enhance institutional knowledge.

- **Deepen understanding of the global, regional and local circumstances, including the key gender issues and developments.**
  - Conduct gender-sensitive situation analyses at the outset, assessing the legal and institutional framework, human and technical capacities, and identifying gender-discriminatory provisions. All collected data should be gender-disaggregated.
  - Integrate a comprehensive gender analysis during project development, including workforce composition, leadership representation, gender stereotypes, and barriers to women's participation.
  - Assess the impact of the Human Rights policies and conventions of the programme and project topic and integrate them throughout the project.
  - Evaluate sector-specific strategies and policies, identifying gaps and entry points for gender mainstreaming.

- **Ensure programmes and projects mainstream gender during the entire project cycle management process.**
  - Develop gender-responsive outcomes and outputs, explicitly defining how the programme or project contributes to gender equality.
  - Establish gender-sensitive quantitative and quantitative indicators and monitoring mechanisms to track progress on gender equality, awareness, and capacity-building.
  - Involve representatives of local organisations in the monitoring and evaluation process.
  - Identify key stakeholders and champions of change at the local level and in local institutions who will be your partners in promoting gender equality.
  - Implement safeguards to prevent projects from directly or indirectly contributing to gender inequality.
  - Establish a Grievance Redress Mechanism (GRM) to address community concerns regarding gender-related project impacts.
  - Collect gender-disaggregated data and qualitative insights to better understand gender dynamics.
  - Design activities that raise awareness promote gender equality and build capacity among key stakeholders and local communities.
  - Integrate gender-sensitive communication strategies throughout project implementation

- **Extend support to local organisations:**
  - Extend long-term financial support to local organisations.
  - Offer mentoring support and capacity training to local organisations.
  - Include local organisations in project selection decisions.

- **Share knowledge and experience:**
  - Organise regional forums in the form of conferences and workshops to exchange knowledge, experiences, and data on the role of women in IFFs, enabling the sharing of good practices in the region.

- Establish cooperation with like-minded donors and development partners to ensure gender mainstreaming is introduced across the sectors.
- Create online platforms for information and resource exchange.

8.2. Recommendations by Jurisdiction

8.2.1. Albania

- Introduce the gender analysis of all aspects of money laundering and terrorist financing, including in reports, training and regulations.
- The FIA and other institutions should collect gender-disaggregated data to better understand gender dynamics related to money laundering and terrorist financing.
- Analyse and revise legislation to ensure its gender sensitivity and effectiveness in combating money laundering and terrorist financing, including regulations of the Notary Chamber.
- Organise specialised training for notaries, law enforcement and other relevant stakeholders, which will focus on gender perspectives to facilitate identification of indicators of the crimes of money laundering and terrorist financing.
- Raise awareness of the gender dimension of money laundering and terrorist financing through campaigns and educational programmes.
- Adopt affirmative measures for the economic empowerment of women to reduce their vulnerability to exploitation.
- Improve institutional cooperation, including information exchange and coordination of activities and establish collaboration with international organisations to secure funding for integrating the gender perspective into these areas.
- Ensure gender sensitivity of law enforcement personnel and improve their effectiveness in combating money laundering and terrorist financing.

8.2.2. Bosnia and Herzegovina

- Develop gender-specific approaches for the prevention and prosecution of IFFs, including disaggregation of statistical data by gender.
- Organise multidisciplinary training focussing on gender analysis, financial investigations and work with victims of organised crime.
- Strengthen cooperation between the judiciary, tax authorities, banks and other institutions enabling them to conduct multidisciplinary financial investigations, while improving coordination between SIPA, tax authorities, banks and NGOs necessary for monitoring financial flows and identifying illicit activities.
- Launch campaigns to inform the public about the consequences of illicit financial activities and the role of women in these processes.
- Include preventive programmes for youth, focusing on financial literacy and the negative consequences of criminal lifestyles, particularly those promoted via social media.
- Ensure that judicial and police authorities have at their disposal financial experts, psychologists and other specialists to support investigations and proceedings.

8.2.3. Montenegro

- Strengthen institutional capacities through training for judges, prosecutors and staff of financial institutions in recognising the role of women in illicit financial activities.

- Introduce gender-disaggregated statistics on criminal activities and women's roles in judicial proceedings.
- Strengthen the legal framework concerning proving of the origin of assets and recognition of women's specific roles in criminal groups.
- Raise awareness through media campaigns and educational programmes to prevent women's involvement in criminal activities.
- Enhance civil society's role o in identifying and supporting women at risk of involvement in criminal activities.

8.2.4. North Macedonia

- Ensure systematic collection of gender-disaggregated data and analysis of gender aspects of IFFs and organised crime.
- Organise specialised training for judges, prosecutors, police and staff of financial institutions on the role of women in organised crime.
- Consider amending the law to more precisely address women's responsibility in criminal activities, particularly in cases where they are exploited as formal property owners.
- Develop mechanisms for faster exchange of information between financial institutions, tax authorities and the police.
- Mount public campaigns and workshops educating women about the dangers of involvement in financial fraud and organised crime.

8.2.5. Serbia

- Introduce the keeping of gender-disaggregated statistical data by judicial and investigative bodies to identify specific patterns of women's participation in illicit financial activities.
- Conduct a detailed analysis of money laundering typologies involving women, focusing on their role in concealing IFFs.
- Develop specialised training for judges, prosecutors and financial inspectors on the gender dimension of financial crime.
- Strengthen prevention mechanisms by educating youths about the consequences of illicit financial activities, particularly in relation to the digital economy and money laundering.
- Increase transparency and publish rulings in financial crime cases to inform the public about penalties for and consequences of these crimes.

8.2.6. Kosovo

- Increase women's representation in institutions investigating financial crimes and promote their professional advancement, which should improve understanding of the gender aspects of crime.
- Institutions should collect gender-disaggregated data on women's participation in the economy and finance to better identify patterns and risks.
- Mandate documenting the origin of money used to purchase real estate and ensure greater transparency of property valuation.
- Establish mandatory due diligence mechanisms for verifying the true ownership of properties and businesses formally registered in women's names.
- Financial regulators should develop specific mechanisms to detect and prevent funding of illicit activities through female-owned bank accounts.

- Legally mandate independent valuation of assets before finalising transactions where the buyer is a woman, given prior abuse of this legal loophole.
- The Financial Intelligence Unit (FIU) should implement mandatory gender-based financial analysis within AML policies. Banks and financial regulators should be required to monitor and analyse gender-disaggregated data on suspicious transactions.
- Organise campaigns to inform women of their rights regarding property ownership, banking services, legal procedures and the purchase of luxury goods (e.g., high-end vehicles).
- Introduce mandatory training for notaries to prevent fraud in property transactions.
- Strengthen financial literacy and access to banking services through subsidies and incentives for women, particularly for female entrepreneurs.

9. ANNEXES

9.1. Annex 1: Statistics on Reported Transactions

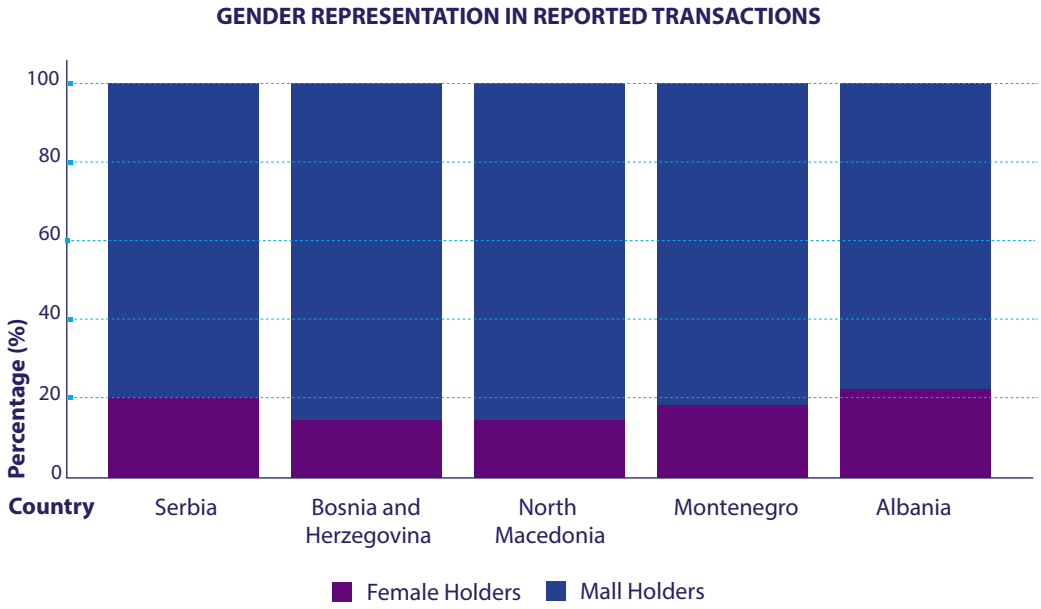
9.1.1. Table: Statistics on Reported Transactions by Country

The table presents the total number of reported transactions and the gender breakdown of the account holders (in %) by country in the Western Balkans.

Country	Total Number of Transactions	(%) Women	(%) Men
Serbia	15000	20	80
Bosnia and Herzegovina	10500	15	85
North Macedonia	8000	15	85
Montenegro	9500	18	82
Albania	12000	22	78

Graph: Gender Breakdown of Account Holders in Reported Transactions

Gender Breakdown in Reported Transactions
Percentage (%)
Serbia Bosnia and Herzegovina North Macedonia Montenegro Albania
State
The graph presents the shares of male and female account holders by country.



9.2. Annex 2: Statistics on Women Prosecuted for Crimes

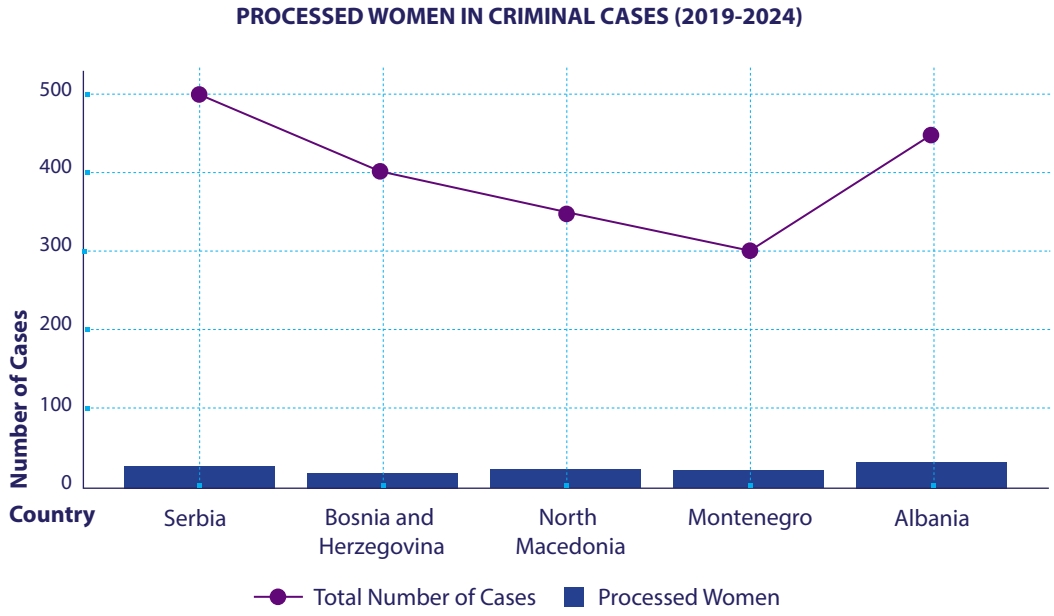
9.2.1. Table: Number of Women Prosecuted for Crimes (2019–2024)

The table presents the total number of criminal cases and number and share of prosecuted women by country in the Western Balkans.

State	Total Number of Cases	Number of Prosecuted Women	Percentage of Women (%)
Serbia	500	25	5.0
Bosnia and Herzegovina	400	15	3.75
North Macedonia	350	20	5.71
Montenegro	300	18	6.0
Albania	450	30	6.67

Graph: Women Prosecuted for Crimes

The graph shows the number of prosecuted women and the total number of criminal cases by state.
Women Prosecuted for Crimes in 2019-2024
Number of cases
Total number of cases
Number of prosecuted women
Serbia Bosnia and Herzegovina North Macedonia Montenegro Albania
State



9.3. Annex 3: Heat Map of Illicit Financial Flows

The map displays key locations in the Western Balkans where illicit financial flow (IFF) activities have been identified. Each point on the map marks a city where women have been involved in various roles, including formal management of companies, logistical support, and coerced involvement in financial fraud.

Heat Map of Identified IFFs in the Western Balkans

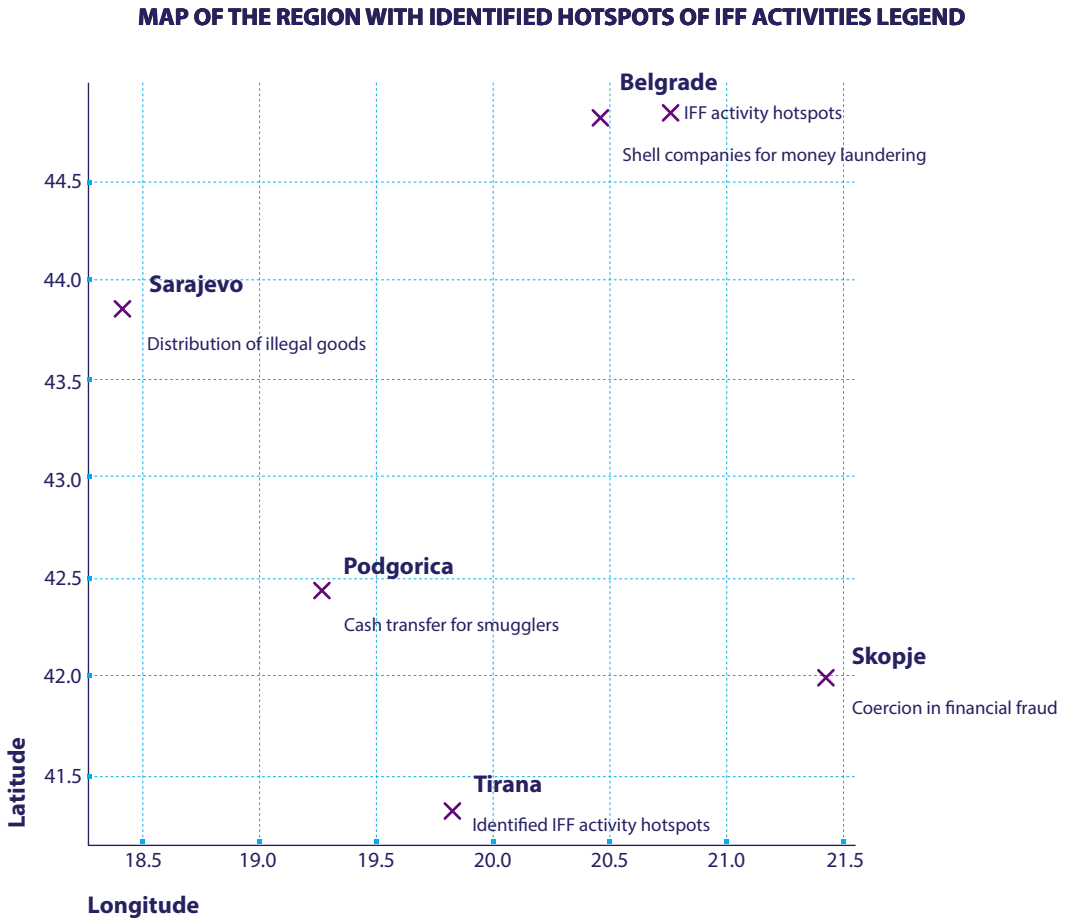


Table: Heat Map - Description of Activities

City	State	Description of Activity
Belgrade	Serbia	Shell companies for money laundering
Sarajevo	BiH	Distribution of illegal goods
Skopje	North Macedonia	Coerced involvement in financial fraud
Podgorica	Montenegro	Money mule for smugglers
Tirana	Albania	Formal business ownership

9.4. Annex 4: Methodological Annexes

9.4.1. Interview Questionnaires and Guides

Semi-structured interviews were conducted to collect qualitative data on the roles of women in IFFs. Representatives of judicial authorities, financial institutions, non-government organisations and victims were interviewed. The following questions were the key in the interview guide:

1. Please describe the main challenges in handling cases involving women in illicit financial flows?
2. How do institutions in your country treat women who are formally registered as owners of shell companies or account holders?
3. Which factors influence women's involvement in these activities (economic, social, familial)?
4. Are women participating in these activities commonly victims of coercion or manipulation?
5. Which strategies do you consider the most effective for preventing and addressing these problems?

9.4.2. Categories of Research Participants

The following stakeholders participated in the research; the anonymity of all participants was preserved:

- Representatives of judicial authorities (judges, prosecutors)
- Employees of financial institutions (regulatory bodies, banks)
- Representatives of non-government organisations (focusing on women's rights and anti-corruption efforts)

9.4.3. Analysis Methodology

The collected data were analysed using the following methods:

- Qualitative analysis of interviews, along with the identification of key themes and patterns
- Comparison of data with international standards (FATF guidelines, UNODC reports)
- Desk-top analysis (statistical reports, judicial processes)
- Contextualisation of the findings within the region's socio-economic and cultural framework