

# PREVENTION AND COMBATING CORRUPTION AND MONEY LAUNDERING IN VIETNAM TODAY

Cung Phi Tai Phuong<sup>1\*</sup>, Do Duc Minh<sup>2</sup>

<sup>1\*</sup> Marter, Postgraduate Faculty of Constitutional Law and Administrative Law, University of Law, Vietnam National University, Hanoi, Vietnam.

<sup>2</sup> Prof, Faculty of Constitutional Law and Administrative Law, University of Law, Vietnam National University, Hanoi, Vietnam.

<sup>2</sup>ORCID: 0009-0009-6582-0249

DOI: <https://doi.org/10.5281/zenodo.16367629>

Published Date: 23-July-2025

---

**Abstract:** In the current context, as technology and information technology continue to develop, the application of technology in payments, transactions, and transfers has become increasingly convenient, which has somewhat facilitated the increasingly complex and sophisticated evolution of money laundering crimes. Along with that, in the global context, with the advantages of convenience and ease in capital circulation, the increasing flow of goods, and the growing number of multinational companies and enterprises, the ability to access transactions and transfers, as well as through cross-border investments for money laundering, is becoming increasingly favorable and rising. Therefore, according to crime prevention experts, money laundering is currently one of the major global issues. In addition, corruption is weakening the potential of nations. Like other countries around the world, Vietnam is facing many challenges in the fight against corruption and money laundering. This article focuses on clarifying the fundamental issues regarding corruption offenses and money laundering offenses; the connection between anti-corruption efforts and anti-money laundering; legal regulations, and the current state of anti-corruption and anti-money laundering efforts in Vietnam.

**Keywords:** Anti-corruption; Anti-money laundering; Law, Vietnam.

---

## 1. INTRODUCTION

Anti-money laundering is one of the very important fields, closely related to anti-corruption efforts. Currently, money laundering activities have become a dangerous issue for all countries around the world and are a matter of concern for the entire international community. Money laundering activities cause varying degrees of harm to many sectors of economic, social, political, security, and defense life in all countries, and have particularly severe impacts on developing countries, including Vietnam. As the socio-economic situation develops more strongly, the crime rate also increases significantly in terms of danger and sophistication. Among these, money laundering crimes are becoming more common, more complex, larger in scale, and causing more severe damage to the economy (Thuy, T, T, T, 2025).

**Money laundering** is the act of individuals or organizations through financial, banking transactions, or other dealings to legitimize money and assets known to be derived from criminal activities or to use that money and assets in conducting business activities or other economic activities.

The purpose of money laundering is to convert assets or profits obtained from illicit and corrupt activities, transforming them into assets considered "legal" (turning illegal income into assets) so that public authorities cannot trace the origin of

the illicit money. As a primary activity of the underground economy, money laundering consists of a set of actions aimed at concealing the origin of money obtained through smuggling, drug trafficking, corruption, and converting it into legal funds. Money laundering is also considered the act of individuals or organizations attempting to create a legal appearance for money or assets obtained from criminal activities. Using sophisticated methods, criminals seek to transform illegal money and assets obtained from criminal activities (black money: dirty money is the money received from illegal activities) into legitimate money with a clean origin for use. After earning a lot of money (billions of USD) through illegal activities, criminals cannot use or deposit it in banks because it would be detected by the authorities, so this "dirty" money needs to be "laundered" clean. In metaphorical terms, "money laundering" is "cleaning money" in accordance with the law; it is a special financial transaction activity to conceal the name, source, and destination of the money. This money is often used in forms of asset accumulation, such as: buying and selling real estate, investing in stocks, investing in projects, construction, savings...

According to the Vienna Convention 1988 and the Palermo Convention 2000 of the United Nations: Money laundering involves activities of transferring or converting assets when: Knowing that the asset originates from criminal activities; Participate in acts aimed at concealing or covering up the illegal origin of the property; Aiding any individual involved in this act; Concealing or covering up the true nature, origin, location, disposition, transfer, rights related to the property, or ownership rights when knowing that the property was obtained from a criminal act; Acquiring, possessing, or using property when at the time of receiving it, knowing that the property was obtained from a criminal act. The Palermo Convention and the United Nations Convention against Corruption (UNCAC) also use the term "laundering of proceeds of crime" or "money laundering" to define illegal acts related to property of illegal origin or derived from criminal activities that need to be classified as crimes. According to the Financial Action Task Force (FATF), money laundering encompasses all activities conducted with the intent to legitimize funds and assets derived from criminal acts.

**Corruption** is a common phenomenon in social life, closely linked to the existence and development of the state, especially in developing countries or countries with transitional economies due to incomplete control mechanisms and infrastructure. The nature of corruption is "the abuse of entrusted power for personal gain" - using public assets (state or organizational assets) for personal benefit. "Corruption is the act of a person in a position of authority who has abused that position for personal gain" (National Assembly, Law No. 36/2018/QH14, Art 3). Corruption manifests in various forms, such as embezzlement of assets; bribery; abuse of power for personal gain; fraud in illegal expenditures or money laundering, among others. Corruption can be carried out in its basic form as an exchange of money, but it can also take on more complex forms, such as using personal influence to gain other benefits. Depending on the nature and degree of danger to society, some acts of corruption are considered crimes, while others are merely regarded as legal violations.

As a negative social phenomenon existing in all countries around the world, corruption is a global issue that causes serious damage to public resources, undermines the proper functioning of the state apparatus, distorts justice and social equity, erodes trust, and hinders efforts to reduce poverty and develop the country and society. Corruption is likened to a pandemic in contemporary political life and has become a global concern. Due to concerns about "the severity of the issues as well as the threats posed by corruption to social stability and security, the erosion of institutions and democratic values, moral values, justice, and the harm caused to sustainable development and governance..."; on October 31, 2003, the United Nations General Assembly adopted the United Nations Convention against Corruption (UNGA, 2003).

## 2. DOCUMENT REVIEW

Demonstrating political determination and improving the institutional framework in the fight against corruption, the Party and the State of Vietnam have issued numerous resolutions, directives, and laws for this task. From the Party's resolutions, the process of building institutions for anti-corruption has been continuously supplemented and improved. Vietnam has passed the Anti-Corruption Law in 2005; amended and supplemented in 2007, 2012, and 2018; amended, supplemented, and perfected the Penal Code in 2015 and 2017 (Law No. 100/2015/QH13; No. 01/VBHN-VPQH), the Law on State Compensation Liability in 2017 (Law No. 10/2017/QH14), and ratified the United Nations Convention against Corruption (June 30, 2009)... The Anti-Money Laundering Law of 2022 took effect on March 1, 2023, and Decree 19/2023/ND-CP dated April 28, 2023, issued by the Government, provides detailed regulations on several provisions of the Anti-Money Laundering Law 2022; Circular 09/2023/TT-NHNN, dated July 28, 2023, of the State Bank of Vietnam Guiding the implementation of certain provisions of the 2022 Anti-Money Laundering Law; Decision 11/2023/QĐ-TTg stipulates the reporting threshold for large-value transactions; Decision 941/QĐ-TTg dated August 5, 2022, of the Prime Minister on the issuance of the National Action Plan on Anti-Money Laundering,

Counter-Terrorism Financing, and Proliferation Financing of Weapons of Mass Destruction for the period 2021-2025; Official Letter 2685/TTGSNH5 dated August 6, 2021, from the Banking Inspection and Supervision Agency regarding the guidance on reporting electronic money transfer transactions in accordance with the Anti-Money Laundering Law. 2022; Resolution No. 03/2019/NQ-HDTP dated May 24, 2019, of the Council of Judges of the Supreme People's Court guiding the application of Article 324 of the Penal Code on money laundering. However, financial institutions still face many difficulties in implementing some new regulations on anti-money laundering, such as identifying and updating customer information for beneficial owners, relatives of politically exposed persons, classifying customers by risk level, and handling customer refusals... Many regulations are oriented towards adopting recommendations based on international standards for combating terrorism and terrorist financing, which are therefore not suitable for Vietnam. On the contrary, many regulations are much stricter than international standards and the regulations of countries complying with the Financial Action Task Force (FATF) on anti-money laundering. Those are important decisions that reflect Vietnam's efforts and determination in combating corruption and money laundering. In addition to the legal framework, there are also quite a few studies on anti-corruption and anti-money laundering in Vietnam.

### 3. ANALYSIS AND DISCUSSION

#### 1. Regarding anti-corruption and anti-money laundering in Vietnam

Immediately after the establishment of the Democratic Republic of Vietnam in 1945, under the leadership of the Communist Party of Vietnam, the state aimed to both boost production and strengthen national defense, while gradually perfecting economic management policies, social management, and ensuring national security and order. At that very moment, the Party and President Ho Chi Minh regarded the fight against corruption as an important task in the work of building the Party and the state government. On November 23, 1945, President Ho Chi Minh signed Decree No. 64 to establish the Special Inspection Committee with the task of supervising all work and personnel of the People's Committees (UBND) and government agencies. On November 27, 1946, President Ho Chi Minh signed Decree No. 223 on the punishment of bribing public officials, public officials accepting bribes, embezzling public funds or citizens' property. Decree No. 223 is considered the first anti-corruption law of the Democratic Republic of Vietnam. This decree clearly states: The crime of bribing public officials, and the crime of public officials accepting bribes, are punishable by imprisonment from 5 to 20 years and a fine equal to double the value of the bribe received... Through the various stages of historical development, with the continuous evolution of social relations, corrupt behaviors have become increasingly diverse and complex, occurring in many places, sectors, and fields. The legal system for preventing and combating corruption in Vietnam has been continuously adjusted, supplemented, and perfected.

After 35 years of implementing the renovation process, Vietnam operates its economy under the socialist-oriented market mechanism. Alongside the significant "historically meaningful" achievements, it also faces many challenges and has encountered some weaknesses and shortcomings. Among these, the negative corruption trend is increasing and becoming extremely complex, "reducing the public's trust in the leadership of the Party and the management of state agencies" (Communist Party of Vietnam, 2006). Corruption is a dangerous act for society committed by individuals in positions of power who exploit their authority for personal gain, causing severe consequences for society. Corruption is likened to an "internal enemy" and a "national calamity," threatening the survival of the regime and hindering the country's development. The struggle to push back/eliminate corruption is a very important task, related to the sustainable development of the country and the regime; it is an important, ongoing task that is both difficult and complex; it is one of the most urgent issues and a direct political mandate of the Party, State, and People of Vietnam today.

Overall, the system of legal documents on anti-corruption is relatively complete, fundamentally ensuring the legal framework for the fight against corruption and negativity. At the same time, many Party regulations on setting examples; inspecting, supervising, and disciplining Party members; controlling officials' assets; the authority and responsibility of the Party's Inspection Committee in anti-corruption work; on decentralization of management and appointment, introduction of candidates, directly including Regulation No. 102-QD/TW dated November 15, 2017, by the Politburo, which stipulates that the statute of limitations for handling violations can extend to those occurring 5-10 years prior... are significant deterrent measures to prevent violators from thinking that retirement means the end of the matter or "safe landing."

Corruption is identified as a very serious issue in Vietnam today, and combating corruption is recognized as a vital requirement and task for the entire political system and society, aiming to preserve and promote the great achievements of the nation and the renewal process under the leadership of the Party. For a ruling party, the most important thing to maintain sustainable governance is to effectively combat the abuse of power and corruption. Fighting corruption is a struggle that the

Party, State, and people of Vietnam are undertaking through various measures, especially by strengthening the construction and rectification of the Party to prevent and push back the evils of bureaucracy, corruption, and negativity. With the Party's steadfast leadership, recognizing corruption as a national disaster, the struggle against corruption and negativity that the Party is leading the Vietnamese people to undertake will still face many difficulties and challenges; it requires the Party and the State to continue the fight against the "internal enemy" with even greater determination, persistence, and decisiveness. Enhancing the effectiveness of the anti-corruption struggle is an urgent requirement in our country today. To achieve greater success in the anti-corruption efforts, it is essential to continuously strengthen and elevate the political will of the Party and the State, especially through the exemplary and decisive actions of the leaders. Global experience shows that the success of anti-corruption efforts largely depends on the determination of the ruling party, especially the determination of leaders and heads of state. In the current complex and serious corruption situation, it is necessary to implement a comprehensive set of solutions for preventing, detecting, and handling corruption, and to strengthen the work of promptly and strictly detecting and handling corrupt and negative behaviors, especially serious corruption cases that attract significant public attention (which has a major impact on preventing corruption). Corruption and negativity mainly occur in state power agencies, therefore, it is essential to truly value the supervision and control of state power, gradually eliminating privileges, benefits, and monopolies. In reality, when power is not strictly controlled and mechanisms of privilege, benefit, and monopoly still exist, it will lead to the emergence of corruption and the formation of "interest groups." Fighting corruption and negativity cannot be achieved solely through political determination; it requires legal tools, the "sword of justice." Just as eradicating this type of vice is only truly effective when primarily based on the law, using legal tools and addressing any organization or individual within the state apparatus in a timely, resolute, and strict manner. Therefore, the state's legal system and the Party's discipline need to be further improved by supplementing and amending legal documents related to anti-corruption work. On the other hand, it is necessary to enhance the effectiveness of the operations of judicial agencies, the efficiency of inspection, examination, and handling of legal violations. And one of the issues that the public is most concerned about in the anti-corruption mission is the recovery of embezzled assets, because the success of this struggle must be evaluated based on the recovery of assets obtained through corruption.

Money laundering is not a new phenomenon; it has existed since ancient times, closely linked to the development of currency and banking. The term "money laundering" is applied to financial transactions related to criminal organizations, first appearing when individuals concealed illicit assets to avoid taxation and asset confiscation. According to the definition of the Financial Action Task Force on Money Laundering - FATF, money laundering is "the act of altering income to conceal its original illegal source." According to many historians, over three thousand years ago, Chinese merchants already knew how to "launder money" to avoid paying taxes to the imperial court. In the context of globalization, international transactions are becoming increasingly diverse along with the ever-growing development of information technology, making money laundering crimes more sophisticated and harder to detect. From the perspective of criminal law science, money laundering is a relatively special crime. As a derivative crime, money laundering has a naturally dependent attribute on the source crime. It can be said that without source crime, there is no money laundering crime. However, in the practical work of combating crime, it often happens that after completing the source criminal acts and obtaining certain material benefits, the individuals also actively and proactively carry out the act of "cleaning" the money and assets they have appropriated, which is the act of "self-laundering." And although there are many criminals who personally launder their dirty money, an "industry" of money laundering has emerged to serve those with dirty money. The core team of this industry consists of professional money launderers, increasingly reinforced by many high-priced lawyers, stock traders, real estate dealers, tax advisors, accountants... Due to the development of science and technology, the exploitation of business, trade, and banking activities for money laundering has been utilized by some individuals to launder criminal proceeds (such as money received from bribery, corruption, drug trafficking, etc.). The money laundering apparatus is increasingly morphing and infiltrating many business sectors and relatively reputable professions in society (such as large banks, sports associations, cultural institutions, and even charitable organizations). Through that, the methods and means of money laundering are becoming increasingly sophisticated, diverse, and large-scale. The methods of money laundering have also undergone many changes, such as relying less on cash and the banking system... and using more financial tools and markets (like securities) or the "barter" method (like trading drugs for weapons). Especially since the 1990s, due to changes in institutional and financial policies along with advancements in internet technology, the money laundering industry has received many new "boosts" with new methods of laundering; "money laundering" activities are no longer unfamiliar in the lives of nations and internationally. The traditional control mechanisms dismantled during the integration process have also created opportunities for many potential issues to arise, including the risk posed by money laundering activities. The act of

money laundering itself is a difficult criminal activity to control, so when this activity infiltrates the financial system with the presence of the credit institution system, it becomes even more complex for regulatory agencies to identify and address. Websites like sex, gambling, and betting sites are often used for money laundering because public authorities find it difficult to trace where the money comes from and who it goes to. Virtual money is also a new, safe method of money laundering, but it poses a risk of instability when large amounts of foreign currency are drained and is very difficult to prevent... In general, as the economy and society develop, it also means the emergence of many sophisticated and dangerous types of crime, including money laundering. Money laundering activities have exploded with globalization, causing many serious economic and social consequences, especially in developing or transitioning countries. Money laundering has become an international issue that the global community is very concerned about, as it causes serious socio-economic consequences affecting national security and the international reputation of a country, weakening the economy as well as restructuring it. Money laundering not only helps criminals conceal the origins of illegal funds but also provides a basis for them to enjoy and use the laundered money to support other criminal activities. Especially, when the world's leading financial centers strive to combat money laundering activities, money launderers are further motivated to shift their operations to emerging countries, including Vietnam.

In Vietnam, money laundering is clearly regulated by law. According to the provisions of clauses 1 and 2, Article 3 of the Anti-Money Laundering Law 2022: "Money laundering is the act of organizations or individuals to legalize the origin of assets obtained from criminal activities." Assets obtained from criminal activities are assets acquired directly or indirectly from criminal acts; the income, profits, benefits, and returns generated from assets obtained from criminal activities (National Assembly, Law No. 14/2022/QH15). Article 324 of the 2015 Penal Code (amended by Clause 122, Article 1 of the 2017 Penal Code Amendment Law) has regulated and described in great detail and specificity the crime of money laundering and the corresponding penalties. Resolution No. 03/2019/NQ-HĐTP dated May 24, 2019, of the Council of Judges of the Supreme People's Court has guided the application of Article 324 of the Penal Code on money laundering, the concept of "money, property." The concept of property includes tangible assets, money, negotiable instruments, and property rights as defined by the Civil Code, which can exist in physical or non-physical forms; movable or immovable; tangible or intangible; documents or legal instruments proving ownership or interest in that property. The purpose of money laundering activities is to create the greatest possible distance between illegal assets and their owners. The initial form of profit manifestation is usually "money," but after the conversion stages to legitimize "money," there are other forms of manifestation such as checks, credit cards, real estate... In general, the forms of profit manifestation from money laundering activities include the economic benefits brought about by money laundering, which are classified as "products of crime" (Strasbourg Convention 1990 of the Council of Europe). In Article 3 of Resolution No. 03/2019/NQ-HĐTP, 34 source crimes are specifically listed and guided as follows: "Source crimes can be committed by Vietnamese citizens, Vietnamese commercial legal entities, and stateless persons residing in Vietnam within or outside the territory of the Socialist Republic of Vietnam." It is also considered a source crime for criminal acts committed outside the territory of the Socialist Republic of Vietnam by foreign citizens or foreign commercial entities, which, according to the provisions of the Vietnamese Penal Code and the laws of the respective country or territory, are classified as crimes. In addition, Article 4 of Resolution No. 03/2019/NQ-HĐTP mentions several circumstances for determining criminal liability (Supreme People's Court of Vietnam, No.03/2019/NQ-HĐTP).

The subjects involved in money laundering include individuals and legal entities participating in the "money laundering" process with the intention of legalizing money and assets obtained from criminal activities and using those assets. The owners of the funds that need to be laundered include individuals and organizations that have committed crimes related to drugs, finance, corruption, fraud, prostitution, and arms trafficking. The individuals who frequently engage in money laundering are: smugglers (drugs, weapons, illegal labor...); corrupt officials; and Those who want to avoid taxes, individuals who want to keep their true income (even if legal) confidential in general; Terrorist organizations (a relatively new phenomenon)... However, these entities are not entirely isolated: corruption, money laundering, and illicit business practices have many similarities, collude with each other, and support one another. For example, corruption requires someone to launder the bribe money, and this money launderer can be a professional criminal or a shell company; conversely, criminals and businesses often bribe embezzling officials to overlook money laundering services. Usually, dirty money originates from: government tax evasion transactions; drug trafficking, arms dealing, terrorism, prostitution, counterfeit goods or stolen goods, smuggling; other activities such as corruption, bribery; black market transactions or underground economic activities of countries to evade economic sanctions or criminal activities. Terrorist criminals also use various means/methods of money laundering to circulate the financial flows that fund terrorist activities. Individuals

and organizations that finance terrorism also seek to use various methods to conceal their actions, creating the greatest possible distance between themselves and the direct perpetrators of terrorist activities. Through various channels and methods, actions such as purchasing real estate, assets, transferring to relatives, investing in business, establishing enterprises, contributing capital to buy business shares, or illegally transferring money abroad... criminals convert income of illegal origin into "clean money".

Among the sources of money that need to be laundered, business sources reflect globalization the most, one of the manifestations being the manipulation of transfer prices to evade taxes by multinational companies. Dirty money can also come from publicly traded businesses in cases where they transfer money from one country to another to avoid taxes. Some specific activities of money laundering include: (i) Investing in a project/construction, contributing capital to a business, or finding other means to conceal/disguise or obstruct the verification of the origin, true nature, location, movement process, or ownership rights of money or property obtained through criminal activities. (ii) Directly/indirectly participating in a transaction involving money or property derived from criminal activities. (iii) Acquiring, possessing, transferring, converting, transferring, transporting, using, and transporting across borders money and property derived from crime; (iv). Provide technical solutions or indirectly assist criminal activities. Provide technical solutions or indirectly assist criminal activities.

Money laundering activities can be carried out through many stages, with different methods, forming a cycle. Each specific act in this cycle is an essential part of money laundering activities in general and is a dangerous act for society. Usually, the money laundering process is identified/implemented according to a basic cycle consisting of the stages: placement/arrangement; layering/dispersal; integration/ consolidation.

Money laundering is one of the most dangerous types of crime and is a pressing issue for many countries around the world, including Vietnam. Not only does money laundering violate ethical principles in society, but it also negatively impacts the functioning of the economy and society as a whole. Money laundering crimes cause many very serious consequences, such as: negative impacts on the macroeconomy, reducing the efficiency of resource allocation within the economy; adverse effects on economic policies; eroding trust in financial markets. Money laundering also causes the flow of funds in the underground economy, leading to fluctuations in monetary demand, instability in interest rates, and exchange rates (especially for developing countries where trade relations with foreign countries depend on foreign currency). Money laundering activities not only waste the economic resources of society but also distort the allocation of those resources and skew economic statistics. The influence of dirty money in the financial system also poses serious risks to the financial systems of nations; it significantly impacts national security and global security.

Money from money laundering activities will not be used to invest in sectors that serve economic development, business sectors that bring significant added value, but mainly invested in concealing assets such as personal consumption purchases, investing in front companies, or buying luxury goods. These activities diminish the economic efficiency of legitimate transactions and erode market confidence. Money laundering also negatively impacts investment orientation, creates many risks, and reduces economic growth. More dangerously, this situation will undermine the effectiveness of domestic monetary policy, causing many difficulties (even distortions) in the State's macroeconomic management. Many experts warn that money laundering can devastate a nation's economic achievements and cause serious consequences for the economy through sophisticated methods to legitimize money and assets originating from crime into legal money and assets.

From the potential consequences, anti-money laundering efforts are a top priority for countries today, including Vietnam.

## **2. The relationship between anti-corruption and anti-money laundering**

### **2.1. Corruption and money laundering: nurturing and symbiotic crimes**

Corruption crimes are the source of money laundering crimes. Money laundering is a tool that accompanies and coexists with corruption crimes, helping corruption to hide, evade the law, and enjoy the "fruits" of assets obtained from corruption. "Dirty money" from corruption is often used to purchase real estate, assets, transfer to relatives, invest in business, establish companies, contribute capital to buy shares in companies, or illegally transfer abroad through secret and public channels. Money laundering originating from corruption not only harms the national economy and finance but also fosters corruption, threatening political stability and national security by closing the loop of illicit profit. The main acts of corruption are "Embezzlement of property," "Receiving bribes," and "Abuse of position or authority to appropriate property." Money laundering crimes originating from corruption are also identified and prosecuted according to the Penal Code. According

to Clause 1, Article 324 on "Money Laundering" of the amended Penal Code (effective from January 1, 2018), a person is accused of money laundering when they engage in one of the following acts: a) Directly or indirectly participating in financial, banking, or other transactions to conceal the illegal origin of money or property obtained through one's own criminal activities or knowing or having grounds to know that it was obtained through the criminal activities of others; b) Using money or property obtained through one's own criminal activities or knowing or having grounds to know that it was obtained through the criminal activities of others in conducting business activities or other activities; c) Concealing information about the origin, true nature, location, movement process, or ownership of money or property obtained through one's own criminal activities or knowing or having grounds to know that it was obtained through the criminal activities of others, or obstructing the verification of such information; d) Committing one of the acts specified in points a, b, and c of this clause regarding money or property known to be obtained from the transfer, transfer, or conversion of money or property resulting from the criminal acts of others.

The national risk assessment report on money laundering and terrorist financing published by the State Bank in May 2019 shows that, to date, Vietnam has investigated and prosecuted one case of money laundering originating from embezzlement. In the group of corruption crimes, compared to bribery and abuse of power for appropriation of property, the number of cases prosecuted and tried for embezzlement is higher (specifically, in 2016, 80 cases with 161 defendants were tried, and in 2017, 18 cases with 41 defendants were tried). The embezzlement cases that have been prosecuted show that the amounts embezzled are very large, with some cases involving sums reaching hundreds of billions of dong. The embezzled funds are used for personal expenses, purchasing real estate, valuable assets, or are "laundered." For the crime of bribery, the prosecution and trial figures for this type of crime are relatively low (in 2016, there were 15 cases with 53 defendants, and in 2017, there were 83 cases with 151 defendants). In reality, bribery is often difficult to detect, but in recent years, bribery cases have typically involved large sums, leading to an increasing risk of money laundering associated with this crime. The amount of money to be enforced for bribery offenses in 2017 increased threefold compared to 2016.

Crimes of abusing positions and powers to appropriate property belong to the group of corruption offenses, so they need to be particularly monitored during the investigation process of money laundering. The practical investigation, prosecution, and trial of this type of crime show that the crime of abusing one's position and authority to appropriate property falls into the high-risk group related to money laundering. Recently, there have been many major cases originating from the abuse of power and authority to misappropriate assets, causing public outrage. Many other major cases such as: the case of Trinh Xuan Thanh and accomplices committing the crime of "Deliberately violating State regulations on economic management causing serious consequences" and "Embezzlement of property" occurring at the Vietnam Oil and Gas Construction Joint Stock Corporation - PVC and the Vietnam Oil and Gas Power Real Estate Joint Stock Company - PVP Land; the case of Hua Thi Phan and accomplices committing the crime of "Abuse of trust to appropriate property" and "Deliberately violating State regulations on economic management causing serious consequences" occurring at Dai Tin Bank - TrustBank... The case of Abuse of Position and Power to Misappropriate Assets and Deliberately Violating State Regulations on Economic Management Causing Serious Consequences occurring at Dong A Commercial Joint Stock Bank. In 2018, the Investigation Police Agency (Ministry of Public Security) initiated criminal proceedings against Phan Van Anh Vu (Chairman of the Board of Directors of Bắc Nam 79 Construction Joint Stock Company) and supplemented the decision to initiate criminal proceedings against Tran Phuong Binh (former General Director of Dong A Commercial Joint Stock Bank) for the crime of abusing positions and powers to appropriate assets of Dong A Bank amounting to up to 200 billion VND (MOJ, & INL, & UNDP, 2024). Besides crimes of embezzlement, bribery, and abuse of power to appropriate property, the risk of money laundering from crimes of abusing trust to appropriate property is also very high. To date, Vietnam has not initiated any prosecutions or investigations into money laundering cases originating from the crime of abusing trust to misappropriate property. However, statistics on the prosecution, indictment, and trial of the crime of abusing trust to appropriate property show that each year, the number of cases of abusing trust to appropriate property brought to trial by competent authorities is very high (an average of over 1,000 cases per year with more than 1,200 defendants convicted). The practical work of investigating, prosecuting, and adjudicating cases of abuse of trust to appropriate property shows that many cases are often carried out by individuals, and criminals tend to use the appropriated funds for personal expenses rather than transferring them to others. If there are acts aimed at legalizing assets obtained through criminal activities, it is necessary to investigate and prosecute for money laundering to ensure the strict enforcement of the law. In reality, embezzlement and corruption are often manifested through acts of accepting bribes and valuable gifts; simultaneously, through methods such as purchasing real estate, assets, transferring to relatives, investing in business, establishing enterprises, contributing capital to buy shares in enterprises, or illegally transferring abroad... to convert illicitly sourced income into "clean money."

Anti-money laundering has become an increasingly pressing front and an effective tool to combat corruption on a global scale and within each country. To combat money laundering, it is essential to have the determination and involvement of nations, as well as global cooperation, to jointly prevent money laundering in all its forms. In Vietnam, corruption is also a pressing issue, and the laundering of money from corruption is becoming increasingly complex. According to the World Bank (WB), approximately 1 trillion USD is lost annually worldwide through bribery and corruption activities. Along with that, each year, trillions of USD of illegal origin are attempted to be laundered through various channels. In the UK alone, hundreds of billions of USD have been funneled in by international criminals to be laundered into clean money and spent. In 2017, Greece successfully dismantled a money laundering ring worth up to four billion USD using Bitcoin.

For Vietnam, in addition to causing losses amounting to hundreds of trillions of dong from the state budget, the situation of corruption also poses a risk of destabilizing the national financial system, affecting national economic security. Especially, these sources of embezzled money have been "cleaned" through various investment channels. Along with the method of money laundering through real estate investment, the situation of money laundering through investment and cryptocurrency transactions is also a channel targeted by these individuals. According to statistics, on some of the largest BTC (Bitcoin) exchanges in the world, the traffic from Vietnam always ranks in the top 5 and has been increasing rapidly over time. For Vietnam, virtual currency will be a new, safe method of money laundering, but it poses a risk of instability due to large outflows of foreign currency and is very difficult to prevent... Along with money laundering domestically, the situation of transferring money abroad for laundering has also become a hot issue in recent years, with an increasing amount and more sophisticated methods. Information published by the National Association of Realtors (NAR) at the end of 2017 indicated that Vietnamese people ranked 6th among the top 10 countries whose citizens buy homes in the U.S.; Statistics also showed that from April 2016 to March 2017, Vietnamese people spent approximately 3.06 billion USD to purchase real estate abroad, mainly in the U.S. In addition, there are many ways to transfer money abroad through disguised investment forms to obtain green cards; transferring money through the import of medical equipment, software... (Thanh Van, 2018). Anti-money laundering and anti-corruption have become and are becoming one of the top concerns of nations and international organizations. Vietnam joined the World Trade Organization (WTO) on January 11, 2007, and ratified the United Nations Convention against Corruption (UNCAC) on June 30, 2009, so it cannot stand on the sidelines of the fight against corruption and money laundering waged by nations and international organizations. It can be affirmed: combating money laundering originating from embezzlement and corruption is an important measure to help prevent and push back the decline in political ideology, ethics, lifestyle, and manifestations of "self-evolution" and "self-transformation" within the internal affairs. Strengthening anti-money laundering efforts contributes to enhancing the overall effectiveness and efficiency of the anti-corruption and anti-embezzlement campaign in Vietnam.

## ***2.2. Anti-money laundering - an important solution to enhance the effectiveness of anti-corruption efforts***

### ***\* Anti-money laundering - a powerful tool for effective anti-corruption efforts***

Money laundering is a special type of crime, an act of crime that "nurtures and coexists" with corruption, and manifestations of moral decay, lifestyle degradation, self-evolution, and self-transformation, expressed in various and sophisticated forms. This criminal act causes damage, destabilizes, and threatens the healthy development of the country in all aspects: economic, social, political, and national security... Therefore, to effectively combat money laundering, it is necessary to resolutely prevent, firmly stop, and gradually eliminate money laundering crimes.

Combating money laundering originating from embezzlement and corruption is an important measure to contribute to preventing and reversing the decline in political ideology, ethics, lifestyle, and the manifestations of "self-evolution" and "self-transformation" within the internal affairs, as well as increasing the recovery of embezzled assets; at the same time, it is an action to concretize Vietnam's commitment to the international fight against money laundering in the context of globalization. Therefore, strengthening anti-money laundering efforts contributes to enhancing the overall effectiveness and efficiency of the fight against embezzlement and corruption in Vietnam (Phong, N. M., 2018). Combating money laundering originating from embezzlement and corruption is also a way to eliminate the ability to enjoy the illegal "spoils" of embezzlement and corruption crimes; it is an action that concretizes Vietnam's commitment to the international fight against money laundering in the context of globalization.

To ensure effectiveness, measures against money laundering originating from corruption must be implemented synchronously and strictly. In the activities of investigating, prosecuting, and adjudicating crimes considered as predicate offenses, including corruption, prosecutorial agencies need to focus on expanding investigations. If any actions are

discovered aimed at legalizing assets obtained through criminal activities, it is necessary to investigate and prosecute for money laundering to ensure the strict enforcement of the law. To be proactive and ensure effectiveness. Especially, it is necessary to continue improving the tax system, bank payment system, comprehensive asset declaration system, which must be strictly monitored; supplement new regulations on receiving valuable gifts; on the obligation to prove, the rights and grounds for verifying assets, income, and handling non-transparent, untraceable assets; and enhance the role of social supervision over the asset and income declaration of officials and civil servants; develop financial intelligence and inspection in identifying, freezing, and recovering assets obtained through corruption.

**\* *Combating corruption must be closely linked with anti-money laundering efforts.***

Speaking at the seminar, Mr. Nguyen Thanh Hai – Deputy Head of the Central Internal Affairs Commission emphasized that anti-money laundering is a crucial activity closely linked to the anti-corruption efforts. Recognizing the importance of anti-money laundering efforts, in recent times, the Party and State have directed the implementation of synchronized anti-money laundering measures, achieving positive results, contributing to the protection of national financial and monetary security and effectively combating various types of domestic and international crime. However, currently, the anti-money laundering efforts in Vietnam still have certain gaps compared to international standards. Mr. Nguyen Thanh Hai candidly pointed out some existing limitations, such as the coordination mechanism between functional agencies being still inadequate, especially in the inspection and supervision of the enforcement of anti-money laundering laws (Trieu Ho, 2025).

Money laundering activities are closely linked to criminal acts in many areas of social life and are regulated by the entire legal system... Preventing money laundering crimes means the ability to limit many other illegal activities in various aspects of social life. The effectiveness of applying the law in combating money laundering, therefore, is not only based on a single legal provision but requires a unified mechanism.

To address the aforementioned limitations and shortcomings, while continuing to implement the Party's policies and resolutions on anti-corruption and anti-money laundering, gradually expanding anti-corruption and anti-money laundering activities to the non-state sector, effectively controlling the assets and incomes of individuals with positions and powers, enhancing the responsibility of leaders, ensuring the consistency between domestic laws and compliance with the United Nations Convention against Corruption,... in the near future, Vietnam needs to implement a number of synchronized solutions such as: (i) Improve the effectiveness of coordination among functional agencies. It is necessary to improve coordination in receiving and processing information, coordination in research work, and coordination in inspection and examination work; (ii) Continue to promote education and propaganda, widely disseminating the goals, viewpoints, tasks, solutions, regulations of the Party and the laws of the State on combating corruption, negativity, and money laundering. Doing a good job in propaganda will promote a high level of self-awareness and unity in understanding and actions among officials, civil servants, employees, and the public, thereby enhancing the exemplary spirit of the leaders. Forming and building a culture of thrift and waste prevention among officials, party members, civil servants, and employees. This ideology needs to be thoroughly understood, widely disseminated, and implemented in practice, thereby creating a fundamentally positive shift in awareness and unity in action. (iii) Build a team of officials working on anti-corruption, negativity prevention, and anti-money laundering who are steadfast, courageous in their struggle; they must be honest and upright. To ensure that civil servants are dedicated and uphold a strong sense of responsibility, it is necessary to have reasonable remuneration policies that create motivation for the team working on anti-corruption, negativity prevention, and anti-money laundering to strive diligently and wholeheartedly in their work; (iv) Seriously implement the principle of "no forbidden zones, no exceptions" and use a synchronized approach with political, ideological, organizational, administrative, economic, and criminal measures in the fight against, detection, and handling of corruption and money laundering. Only when carried out thoroughly, decisively, and uniformly can the work of combating corruption and money laundering achieve final results and ensure actual deterrence. (v) Continue to develop and perfect Party regulations and State laws on preventing and combating corruption, negativity, and money laundering. Strengthen inspection and supervision work, detect early, and strictly handle corruption, negativity, and money laundering cases. The work of inspection, auditing, investigation, prosecution, and trial must be carried out effectively, ensuring objectivity, transparency, and openness; resolutely recovering embezzled assets to mitigate and limit the consequences of corruption and money laundering, while also demonstrating the deterrent effect of the law. (vi) Enhance international cooperation in the field of anti-corruption and anti-money laundering; (vii) It is necessary to establish mechanisms to protect, reward, and timely encourage those who actively and courageously detect and combat corruption and money laundering.

#### 4. CONCLUSION

In recent years, the anti-corruption campaign has always been a focus of the Party and the State in the work of building the Party and constructing the socialist rule-of-law state. The anti-corruption struggle is not only supported by the entire populace but also highly regarded by the international community. With the motto "no forbidden zones, no exceptions" in the fight against and handling of corruption cases, the recent high-profile corruption cases have been dealt with strictly, initially restoring public trust and recovering many assets of the State and the people. However, the fight against corruption and negativity is a long journey, full of difficulties and challenges. Corruption acts are becoming increasingly sophisticated in various forms, occurring in many places, sectors, and localities. The task of combating corruption and negativity is becoming increasingly burdensome. The laws on anti-corruption have not yet met the requirements of the Party and State's efforts to strengthen anti-corruption, and there are still some limitations and shortcomings. In recent times, the results of recovering assets of corrupt origin have been limited, indicating that anti-money laundering is becoming and will continue to be an important tool in combating corruption and enhancing the effectiveness of recovering corrupt assets. Therefore, anti-money laundering measures originating from corruption must continue to be implemented synchronously, promptly, and strictly in accordance with legal regulations, based on ensuring national sovereignty and security; ensuring normal economic and investment activities; protecting the legal rights and interests of organizations and individuals; and preventing abuse of power and exploitation of anti-money laundering efforts to infringe upon the legal rights and interests of related organizations and individuals. For Vietnam, enhancing the capacity to combat money laundering, especially funds originating from embezzlement and corruption, must be closely linked to the fight against corruption, degradation, and the "self-evolution" and "self-transformation" within the Party and the state management apparatus.

#### REFERENCES

- [1] Communist Party of Vietnam. (2006), Complete Party Documents, Volume 47, Political Report of the Central Committee at the 6th National Congress of the Party, National Political Publishing House, Hanoi.
- [2] MOJ, & INL, & UNDP. (2024), Research report on international experience in criminal handling of money laundering crimes originating from corruption, <https://www.moj.gov.vn/qt/tintuc/Lists/NghienCuuTraoDoi/Attachments/2680/bao%20cao%20nghien%20cuu.pdf>
- [3] National Assembly, Law on Anti-Corruption 2018 (Law No. 36/2018/QH14)
- [4] National Assembly, Law on Anti-Money Laundering 2022 (Law No. 14/2022/QH15)
- [5] National Assembly, Penal Code 2017 (Law No. 01/VBHN-VPQH)
- [6] Phong, N, M. (2018), Anti-money laundering - an important solution to prevent and combat corruption, <https://www.qdnd.vn/xa-hoi/cac-van-de/chong-rua-tien-giai-phap-quan-trong-de-phong-chong-tham-nhung-537451>
- [7] Supreme People's Court of Vietnam, Resolution guiding the application of Article 324 of the Penal Code on the crime of money laundering, (No.03/2019/NQ-HĐTP).
- [8] Thanh Van. (2018), "Prevention and control of money laundering: The participation of the entire political system is required", <https://tapchitaichinh.vn/phong-chong-rua-tien-can-su-vao-cuoc-cua-ca-he-thong-chinh-tri.html>
- [9] Thuy, T, T, T. (2025), Improving the effectiveness of law enforcement on anti-money laundering in the current period, Vietnam Lawyers e-magazine, <https://lsvn.vn/nang-cao-hieu-qua-thuc-thi-phap-luat-ve-phong-chong-rua-tien-trong-giai-doan-hien-nay-a156478.html>
- [10] Trieu Ho. (2025), Continuing to improve the legal framework on controlling suspicious transactions and preventing money laundering in Vietnam, People's Court Magazine electronic, <https://tapchitoaan.vn/tiep-tuc-hoan-thien-phap-ly-ve-kiem-soat-giao-dich-dang-ngo-phong-chong-rua-tien-tai-viet-nam13546.html>
- [11] United Nations General Assembly (UNGA). (2003), United Nations Convention against Corruption (UNCAC)