

# Money laundering in Vietnam: Legal responses and enforcement gaps



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**Abstract** Money laundering is a serious and increasingly complex crime that poses substantial threats to the economic stability, political integrity, and social order of countries worldwide, including Vietnam. In the context of Vietnam's deepening integration into the global economy, rapid technological development, digitalization of financial services, and the growing sophistication of financial transactions have created favorable conditions for money laundering activities to expand in both scale and complexity. These illicit practices are not only increasing in frequency but are also becoming more technologically advanced and difficult to detect, presenting significant challenges for law enforcement and regulatory authorities. This paper provides an in-depth analysis of money laundering as a criminal phenomenon in Vietnam, with a particular focus on the current legal framework governing anti-money laundering and the practical difficulties encountered in its implementation. The study employs a qualitative research methodology, combining doctrinal legal analysis, critical review of relevant legal documents, and comparative assessment of international standards and best practices in anti-money laundering regulation. Through an examination of Vietnamese laws, regulatory mechanisms, and enforcement practices, the paper identifies persistent shortcomings in practical application, including weak enforcement capacity, limited coordination among relevant agencies, insufficient professional expertise, and the rapid adaptation of laundering techniques by criminal networks. Although Vietnam has made notable efforts to align its anti-money laundering regime with international norms, especially those promoted by global financial and regulatory institutions, several gaps remain that hinder effective enforcement. By synthesizing legal analysis with comparative insights, this study highlights key areas requiring improvement and proposes strategic measures to strengthen Vietnam's anti-money laundering capacity. These measures include targeted legal reforms, enhanced institutional capacity building for law enforcement and supervisory authorities, improved interagency cooperation, and more effective financial monitoring and reporting systems. Strengthening Vietnam's anti-money laundering framework is essential not only for safeguarding national security and financial stability but also for ensuring compliance with international obligations, promoting transparency, and enhancing investor confidence in Vietnam's financial system.

**Keywords:** legal framework, financial crime, enforcement challenges, financial transactions, anti-money laundering

## 1. Introduction

Money laundering is a global concern that threatens economic stability, national security, and social integrity (Levi & Reuter, 2006; Vaithilingam & Nair, 2007). It involves disguising illegally obtained funds to make them appear legitimate, allowing criminals to use the proceeds of their unlawful activities undetected. Money laundering extends beyond financial crimes, as it is often linked to corruption, drug trafficking, human trafficking, and terrorism financing (Tiwari et al., 2020; Walker, 1999). As an emerging economy with increasing integration into the global financial system, Vietnam faces growing money laundering risks. The country's rapid economic development, banking sector expansion, and increasing number of cross-border transactions, while beneficial, create vulnerabilities that criminals can exploit. Addressing money laundering is crucial not only for safeguarding Vietnam's financial system but also for ensuring compliance with international standards set by organizations such as the Financial Action Task Force (Schneider & Windischbauer, 2008).

Recognizing these risks, Vietnam has taken steps to establish and strengthen its antimoney-laundering legal framework (Tran & Rose, 2022). The country's first major anti-money laundering legislation was introduced in 2005 with the enactment of the Law on Anti-Money Laundering. This was followed by various amendments and additional regulations to align Vietnam's anti-money laundering framework with global standards. In 2012, Vietnam enacted a more comprehensive anti-money laundering law, mandating stricter reporting requirements for financial institutions, improved monitoring mechanisms, and increased penalties for noncompliance (Toan, 2022). Additionally, the State Bank of Vietnam was assigned a central role in overseeing anti-money laundering compliance and coordinating efforts with other government agencies (Loan, 2016). Despite

these advancements, Vietnam continues to face challenges in effectively enforcing anti-money laundering regulations because of gaps in implementation, resource constraints, and evolving laundering tactics (Toan & Dung, 2023).

In practice, Vietnam continues to encounter multiple obstacles in combating money laundering. These challenges include the increasing sophistication of laundering methods, weak enforcement mechanisms, regulatory gaps, the prevalence of the informal economy, and heightened cross-border risks. Criminals continually adapt to new regulatory measures by employing more advanced techniques, particularly through digital financial transactions, cryptocurrencies, and offshore structures, which complicate detection and tracing efforts (Wronka, 2022). Vietnam's rapidly expanding fintech sector and digital payment platforms further intensify these challenges. Although anti-money laundering laws are in place, many financial institutions lack sufficient expertise and technological capacity to identify and report suspicious transactions effectively. In addition, limited coordination among regulatory and enforcement agencies undermines enforcement efficiency, while existing sanctions are often insufficient to deter financial crimes (Teichmann, 2020). Vietnam's sizable informal economy, characterized by cash-based transactions and unregistered businesses, also provides opportunities for laundering illicit funds, making effective financial monitoring difficult. Moreover, Vietnam's geographic location and shared borders with several countries expose it to cross-border money laundering activities, including trade-based laundering, underground banking, and smuggling (Levi, 2002). These factors underscore the importance of international cooperation in addressing transnational financial crimes.

Given the growing complexity of money laundering threats, Vietnam must take further steps to enhance its anti-money laundering framework. Strengthening law enforcement, improving interagency coordination, and adopting advanced financial monitoring systems are essential for increasing antimoney laundering effectiveness (Toan, 2022). Additionally, raising awareness and providing adequate training for financial institutions and regulatory bodies are critical for ensuring compliance with anti-money laundering regulations. Furthermore, Vietnam must align its anti-money laundering policies with international best practices to avoid being classified as a high-risk jurisdiction by global financial bodies (Tran, 2020). Compliance with Financial Action Task Force recommendations, closer collaboration with international financial intelligence units, and enhanced due diligence requirements for financial institutions will contribute to a more robust anti-money laundering system.

Against this legal and social background, this study aims to analyze Vietnam's anti-money laundering legal framework, assess the effectiveness of its implementation, and identify key challenges hindering enforcement. By examining existing laws, financial regulations, and relevant international standards, the research seeks to propose practical solutions for strengthening Vietnam's capacity to combat money laundering. The specific objectives are to analyze legal definitions and anti-money laundering mechanisms in Vietnam; assess enforcement effectiveness among regulatory agencies and financial institutions; identify major challenges such as regulatory gaps and enforcement weaknesses; examine international best practices applicable to Vietnam's context; and propose strategic measures to enhance Vietnam's overall anti-money laundering capabilities.

## 2. Research methodology

This study adopts a qualitative research methodology grounded in a doctrinal legal analysis. The primary method involves a systematic review of Vietnam's existing legal framework on antimoney laundering, particularly the Penal Code of 1999, its 2009 amendments, the revised 2015 Penal Code, and the 2012 Anti-Money Laundering Law, along with subsequent guiding legal documents. These domestic laws were critically examined in relation to international legal instruments, such as the 1988 Vienna Convention, the 2000 Palermo Convention, and the Financial Action Task Force Recommendations, to assess the extent to which Vietnam's anti-money laundering framework aligns with global standards.

The research further relied on secondary sources, including academic articles, government reports, and prior evaluations conducted by international organizations such as the Asia/Pacific Group on Money Laundering (APG). A comparative legal approach was applied to highlight the similarities and differences between Vietnamese regulations and international best practices, with particular attention given to gaps in definitions, scopes, enforcement mechanisms, and regulatory overlaps.

In addition, the study integrated a policy analysis method by examining enforcement challenges through a review of practical reports, case law, and regulatory assessments. This enabled the identification of weaknesses in institutional coordination, financial monitoring, and technological capacity. By drawing upon scholarly literature and empirical findings from prior evaluations, this research assessed both the effectiveness and the limitations of Vietnam's current antimoney laundering regime.

Finally, a prescriptive legal analysis was conducted to propose reforms and policy recommendations. These proposals are based on synthesizing international standards, Vietnam's legal context, and practical enforcement challenges. The methodology, therefore, combines doctrinal, comparative, and policy-oriented approaches to provide a comprehensive understanding of the legal framework and practical obstacles in Vietnam's fight against money laundering.

## 3. Overview of money laundering and money laundering crimes

Money laundering is a well-known issue in the global economy and legal frameworks (Alldridge, 2008; Korejo et al.,

2021). This phenomenon has become increasingly prevalent across numerous jurisdictions. In the era of globalization and international integration, cooperation among nations in various domains—including economics, politics, culture, society, security, and defense—has become an inevitable and objective trend (Kumar, 2012). Consequently, criminals can more easily collaborate, expand their operations, and transcend national borders. As a result, crime in general, and money laundering in particular, has evolved into a complex, transnational challenge that poses significant obstacles to law enforcement agencies (Buchanan, 2004).

From an international legal perspective, money laundering has been addressed in several key conventions, notably the 1988 Vienna Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances and the 2000 Palermo Convention against Transnational Organized Crime. Despite its recognition as a serious criminal offense, international law has yet to establish a universally accepted definition of money laundering. However, legal scholars and policymakers generally agree on its fundamental elements. Money laundering involves the concealment of the origin, ownership, or control of illicitly obtained funds or assets to make them appear legitimate. It encompasses financial transactions designed to disguise the proceeds of criminal activities and integrate them into the formal financial system to obscure their illicit origins.

Once successfully laundered, illicit funds become nearly indistinguishable from legally obtained assets, allowing criminals to utilize them without suspicion. Essentially, money laundering legitimizes proceeds from illegal activities through processes such as conversion, transfer, or concealment, ultimately reintegrating these funds into the economy under a lawful appearance (Ahuja et al., 2023). In other words, it serves as a mechanism to transform unlawfully acquired wealth into seemingly legitimate financial resources.

Money laundering is intrinsically linked to various other criminal offenses, particularly financial crimes such as smuggling, illicit business operations, tax evasion, and corruption-related activities. Additionally, it is closely associated with drug trafficking and other forms of organized crime. The process of money laundering typically consists of three distinct stages: (1) placement—separating illicit funds from their criminal source; (2) layering—obscuring the audit trail through a series of complex transactions to impede investigative efforts; and (3) integration—reintroducing laundered funds into the legal financial system, making them appear legitimate and usable in the economy (Kumar, 2012).

Given its sophisticated nature and far-reaching consequences, money laundering poses significant challenges to both national and international regulatory frameworks. Combating this crime requires a multifaceted approach, including the enhancement of legal provisions, strengthened intergovernmental cooperation, and the adoption of advanced financial monitoring technologies.

#### **4. International and Vietnamese legal regulations on money laundering crimes**

##### *4.1. International legal regulations*

The term “money laundering” first emerged in the United States in the late 19th century (Ahuja et al., 2023; Tiwari et al., 2024). However, it gained widespread recognition only in 1972, when Mexican bank accounts were used to obscure the identities of political donors. In the following years, the term was officially incorporated into various legal instruments issued by U.S. courts.

Today, the United Nations, national governments, and numerous nongovernmental organizations (NGOs) actively combat money laundering. The core principles of international legal frameworks against money laundering are reflected primarily in the 1988 United Nations Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic Substances (commonly known as the Vienna Convention) and the 40+9 Recommendations of the Financial Action Task Force on Anti-Money Laundering and Counter-Terrorist Financing (AML/CTF). Notably, on December 15, 2000, during a session in Palermo, Italy, the United Nations General Assembly adopted Resolution 52/25, leading to the establishment of the United Nations Convention Against Transnational Organized Crime (UNTOC), also referred to as the 2000 Palermo Convention.

The Financial Action Task Force defines money laundering as “the processing of criminal proceeds to disguise their illegal origin, thereby legitimizing the illicit financial gains derived from criminal activities.” Furthermore, Article 3 of the 1988 Vienna Convention outlines money laundering activities, which include the following:

(i) The conversion or transfer of property, knowing that such property is derived from any offense related to illicit drug trafficking, with the purpose of concealing or disguising its illicit origin, or assisting any person involved in such criminal activity to evade legal consequences.

(ii) The concealment or disguise of the true nature, source, location, disposition, movement, or ownership of property, knowing that such property is derived from an offense related to illicit drug trafficking.

The 2000 Palermo Convention expanded on these provisions by defining key terms, prescribing specific measures for national implementation, and advocating for the confiscation of proceeds derived from criminal activities. It emphasizes international cooperation, training, research, and the exchange of information to strengthen anti-money laundering efforts. Additionally, the convention mandates that member states criminalize specific activities, including participation in organized criminal groups (Article 5), money laundering offenses (Article 6), corruption-related offenses (Article 8), and the obstruction of justice (Article 23).

While the Palermo Convention aligns with the Vienna Convention in defining money laundering, it significantly broadens the scope of predicate offenses—crimes that generate illicit proceeds subject to laundering. Unlike the Vienna Convention, which focuses primarily on drug-related crimes, the Palermo Convention recognizes a wider range of predicated offenses, including drug trafficking, corruption, gambling offenses, tax evasion, smuggling, and other financial crimes. Specifically, it states that “predicate offenses refer to any criminal act that generates assets susceptible to laundering,” thereby encompassing a broader spectrum of illicit activities that facilitate money laundering.

A comparative analysis of the definitions provided in the 1988 Vienna Convention and the 2000 Palermo Convention reveals that, despite variations in the classification of predicate offenses, the fundamental nature of money laundering remains consistent across both instruments. These international legal definitions serve as essential legal benchmarks for member states, guiding them in formulating national antimoney laundering laws and reinforcing the recognition of money laundering as a serious socioeconomic crime requiring stringent regulatory measures.

#### 4.2. Vietnamese legal regulations

Vietnam signed the Palermo Convention on December 13, 2000, and officially ratified it on May 8, 2012 (Toan, 2022). By ratifying the Convention, Vietnam formally committed to fulfilling its obligations to incorporate into its domestic legal framework the criminalization of certain acts outlined in the Convention and the Penal Code, including the act of legitimizing assets derived from criminal activities, commonly referred to as money laundering.

Prior to this ratification, Vietnam had already introduced its first legal provisions on money laundering in the 1999 Penal Code. Article 251 of the 1999 Penal Code defined money laundering as acts involving financial, banking, or other transactions intended to legitimize money and assets obtained through criminal activities or to use such money and assets for business or economic operations. This provision represents Vietnam’s initial legal definition of money laundering.

In the 2009 amendment of the Penal Code, the offense of “legitimizing money and assets obtained from criminal activities” was officially revised and renamed “money laundering” (Article 251). This revision introduced a more detailed and comprehensive definition of crime, aligning Vietnam’s legal framework more closely with the provisions set forth in the 2000 Palermo Convention.

The 2015 Penal Code further refined and expanded upon the legal foundations established by the 1999 Penal Code and its 2009 amendments. This strengthened Vietnam’s regulatory framework against money laundering, ensuring greater alignment with international legal standards. These legal developments underscore Vietnam’s commitment to combating money laundering and fulfilling its international obligations in financial crime prevention (Ba & Huynh, 2018).

### 5. The current situation of antimoney laundering efforts

Recognizing the importance of combating money laundering, the Party and State of Vietnam have proactively implemented a range of coordinated measures in recent years (Nguyen Le, 2013). These efforts have led to positive changes, including the gradual development and enhancement of the legal framework. For example, the 1999 Penal Code initially stipulated the offense of legalizing money or assets obtained from criminal activities. On June 19, 2009, Article 251 of the 1999 Penal Code was amended to explicitly define money laundering as a criminal offense. In the revised Penal Code of 2015 (amended in 2017), money laundering is clearly defined in Article 324, with detailed provisions, including the criminal responsibility of legal entities involved in money laundering offenses. In 2012, the National Assembly passed the Law on Anti-Money Laundering, along with related guiding legal documents.

In parallel with domestic anti-money laundering efforts, Vietnam has gradually integrated into the international community on this issue. This is exemplified by Vietnam’s accession to the APG in May 2007 as its 34th member. As an APG member, Vietnam is obligated to comply with the recommendations of the Financial Action Task Force and fulfill its responsibilities within the APG framework. In 2008, Vietnam underwent a comprehensive multiparty evaluation of its anti-money laundering and counterterrorism financing mechanisms, in accordance with the Financial Action Task Force’s 40+9 recommendations. Currently, Vietnam is an observer in the Financial Intelligence Units (FIU) group and is in the process of applying for full membership.

In practice, however, the fight against money laundering in Vietnam still faces several challenges and limitations:

First, the Law on Anti-Money Laundering has several shortcomings. Passed on June 18, 2012, and coming into effect on January 1, 2013, the law has revealed several gaps over its 10 years of implementation that require amendments. One such limitation is its scope. The law addresses two main issues: anti-money laundering and combating money laundering related to terrorism financing. However, with the enactment of the Anti-Terrorism Law in 2013, which also addresses money laundering linked to terrorism financing, the scope of the 2012 Anti-Money Laundering Law remains partially redundant. This overlap between the two laws has created inconsistencies and poses challenges in practical implementation.

Additionally, there are issues with the interpretation of key terms. For example, Article 4, Paragraph 1 of the 2012 Anti-Money Laundering Law defines money laundering, but the explanation of the term—particularly subpoints b and c—does not

align with the revised 2015 Penal Code and the 2019 Resolution No. 03/2019/NQ-HĐTP. The latter offers clearer guidelines regarding money laundering offenses.

Another concern is the regulation of new technological transactions. The perpetrators of money laundering are increasingly using innovative methods, such as virtual currencies (e.g., Bitcoin) or digital wallets, to convert illicit funds into digital assets, which can then be converted back into cash. This makes tracing the illicit origins of funds more difficult for authorities. However, the 2012 Anti-Money Laundering Law and related decrees do not specifically address how to manage and identify suspicious transactions involving virtual currencies and electronic payments.

Furthermore, there is a gap in the reporting system. The law requires financial institutions and certain nonfinancial businesses to report suspicious transactions or large-value transactions. However, Article 26 designates only the State Bank of Vietnam as the recipient of these reports, without specifying which other authorities should be involved. This creates difficulties for entities responsible for reporting transactions, particularly those involving electronic money transfers or large-value transactions.

Second, there remain issues with the enforcement of money laundering laws. While administrative penalties for money laundering violations are specified in Decree No. 88/2019, the fines are relatively low and do not correspond to the risk levels associated with money laundering in different sectors. As a result, administrative penalties are less effective as proactive tools for detecting money laundering activities. Regarding criminal penalties, while the 2015 Penal Code and Resolution No. 03/2019/NQ-HĐTP provide some guidance, practical challenges still exist in investigating and prosecuting money laundering offenses. One significant difficulty is tracing the origin of illicit funds, particularly when the original offense has expired or occurred overseas.

Third, there are limitations in the coordination between law enforcement agencies. While the 2012 Anti-Money Laundering Law and the Coordination Regulations (02/2019/QCPH-BCA-VKSNDTC-TANDTC) clearly define the roles and responsibilities of various agencies in preventing money laundering, practical coordination remains insufficient. One reason for the limited effectiveness is that the entities responsible for monitoring the financial sector—particularly banking and foreign exchange activities—have not effectively collaborated to exchange necessary information. This weakens overall efforts to detect, investigate, and prosecute money laundering offenses. Additionally, the application of scientific research and technological advancements in money laundering prevention remains underdeveloped.

Fourth, the widespread use of cash and the lack of mandatory requirements to prove the origin of funds further complicate the detection and prosecution of money laundering. In Vietnam, cash transactions are common, and there is no requirement to prove the origin of money or assets. This creates opportunities for individuals involved in money laundering to conceal or legitimize illicit funds. Moreover, gaps in the oversight of foreign exchange and investment flows—particularly from abroad—allow criminal actors to funnel illegal funds into seemingly legitimate businesses, such as real estate or bankrupt companies, thus completing the money laundering process.

## 6. Recommendations and solutions to enhance the effectiveness of the fight against money laundering

First, it is essential to continue reviewing, supplementing, and improving the legal framework related to anti-money laundering. With respect to the 2012 Anti-Money Laundering Law, relevant authorities must promptly study and amend the law to align it with international commitments, particularly the 40+9 Recommendations from the Financial Action Task Force on combating money laundering. Specifically, the scope of the law should remove provisions related to countering money laundering associated with terrorism financing and transfer these provisions to the 2013 Anti-Terrorism Law, ensuring consistency and coherence between legal regulations. Clear and comprehensive definitions of “money laundering” should be incorporated to align with the money laundering offenses outlined in the 2015 Penal Code. Furthermore, specific regulations must be introduced to define the legal requirements, conditions, and indicators of suspicious large transactions, including those related to cryptocurrency and electronic transactions. The law should also specify which authorities are responsible for receiving and handling reports from financial institutions and nonfinancial businesses regarding money laundering, thus enhancing the effectiveness of detection and enforcement efforts.

With respect to administrative penalties for money laundering violations, the current approach, which imposes a general administrative fine across all sectors, is insufficient. Relevant authorities should develop specific regulations for administrative fines in anti-money laundering practices tailored to each sector. This would involve defining violations and corresponding penalties, akin to the regulations for gambling outlined in the 2021 government decree. In parallel, fines for violations related to antimoney laundering should be increased to reflect the gravity of the offenses.

In terms of criminal penalties, the Penal Code should define money laundering as a criminal offense when the value of illicit assets exceeds 100 million VND. Moreover, clear guidelines should be provided for cases where preparatory actions for money laundering are detected. To strengthen preventive measures and enhance deterrence, lawmakers should consider increasing penalties for money laundering crimes.

Furthermore, to ensure that the antimoney laundering legal system is more coherent, relevant authorities should review, amend, and supplement laws related to taxation, asset declaration, anticorruption, intermediary payment services, virtual assets, and cryptocurrency. Legislation should enable the taxation of assets or income for which a taxpayer cannot

sufficiently justify the source, even when the origin of the assets has not been proven illegal. A more stringent regulatory framework should also incentivize citizens to limit cash transactions and adopt digital payment methods, such as e-wallets, thereby enabling financial institutions to more effectively monitor and control fund flows, thus contributing to the fight against money laundering. In particular, to counteract criminals using the internet to legitimize proceeds from crimes, authorities must expedite the refinement of the legal framework regulating the issuance, trading, and exchange of virtual currencies on international cryptocurrency exchanges.

Second, enhancing the responsibility and effectiveness of various agencies involved in the fight against money laundering is crucial. For financial institutions and nonfinancial businesses engaged in activities related to money laundering prevention, the State Bank of Vietnam, as the lead agency in managing antimoney laundering efforts, should strengthen coordination with relevant ministries and agencies to improve management, supervision, and the awareness and responsibility of stakeholders in combating money laundering. This includes strict adherence to regulations on customer identification, risk assessment, legal agreements, reporting suspicious large transactions, and the hiring, training, and development of qualified personnel to ensure the effective implementation of internal control procedures. Institutions should also integrate technological advancements to monitor and report suspicious transactions and improve the collection and storage of electronic documents and evidence.

With respect to government agencies' roles in anti-money laundering efforts, they must fully comply with their responsibilities as outlined by the law and national action plans on anti-money laundering. These agencies should focus on specific tasks such as reviewing and proposing amendments to the Penal Code concerning money laundering, investigating and prosecuting money laundering offenses, and creating and issuing detailed regulations for the investigation and prosecution of such crimes. Additionally, authorities should prioritize enforcing penalties for money laundering violations within relevant sectors, particularly those involving new technological products.

For law enforcement agencies, including the Ministry of Public Security, the Prosecutor's Office, and the judiciary, effective coordination is necessary to overcome challenges and enhance the quality and efficiency of investigations, prosecutions, and trials of money laundering cases. Authorities should continue to work proactively in drafting and implementing laws related to money laundering investigations and prosecutions, with particular attention given to asset recovery in criminal cases.

Third, it is vital to strengthen international cooperation in combating money laundering, asset conversion, and the illegal transfer of assets abroad. The fight against money laundering and the recovery of illicit assets will be more effective if international collaboration is leveraged, both through formal (government-to-government) and informal (with international organizations) mechanisms. To achieve this goal, Vietnam should actively engage in the exchange of information and documents related to anti-money laundering efforts, identify and freeze assets of money laundering criminals, and cooperate in mutual legal assistance and extradition procedures for money laundering offenses. Throughout this process, adherence to international conventions, bilateral agreements, and other relevant legal provisions is crucial, ensuring that Vietnam's legal and socioeconomic conditions are considered.

## 7. Conclusions

This study confirms that money laundering is an existing and persistent phenomenon in Vietnam, closely linked to other serious crimes such as drug trafficking, corruption, and economic offenses. Numerous recent cases have revealed substantial volumes of money and assets circulating without transparent explanations regarding their origin or movement, demonstrating that money laundering not only results from predicate crimes but also facilitates the emergence of new and more complex criminal activities. Addressing money laundering, therefore, requires a comprehensive and multifaceted approach that combines both preventive and repressive measures, supported by effective information-processing systems, strong institutional coordination, and sustained international cooperation. At the same time, anti-money laundering policies must strike a careful balance between disrupting illicit financial flows and preserving the normal functioning of legitimate economic, political, and social activities.

Beyond identifying the nature and persistence of money laundering in Vietnam, this article makes three central contributions. First, it provides a systematic analysis of Vietnam's anti-money laundering legal framework, highlighting both its progress toward international standards and the practical limitations that continue to undermine effective enforcement. This analysis demonstrates that legislative development alone is insufficient without corresponding institutional capacity and operational effectiveness. Second, the study offers a contextualized assessment of enforcement challenges, emphasizing structural weaknesses such as limited interagency coordination, gaps in professional expertise, and the increasing sophistication of laundering techniques. By situating these challenges within Vietnam's broader economic and regulatory environment, the article contributes to a deeper understanding of why implementation remains difficult in practice. Third, drawing on international best practices, the article proposes strategic directions for strengthening Vietnam's anti-money laundering regime, including targeted legal refinement, capacity building for competent authorities, improved financial monitoring mechanisms, and enhanced international cooperation.

Overall, the findings underscore that combating money laundering in Vietnam is not solely a legal or technical task but a long-term strategic process that requires sustained commitment, institutional reform, and alignment with global anti-money laundering standards. By offering both analytical insight and practical recommendations, this study aims to contribute to policy development and scholarly discussion on strengthening Vietnam's capacity to prevent and combat money laundering in an increasingly interconnected financial environment.

## 8. Declarations

### 8.1. Ethical considerations

Not applicable.

### 8.2. Use of artificial intelligence (AI)

The authors declare that the generative artificial intelligence (AI) tool ChatGPT was used exclusively for language editing and/or grammatical improvement. The use of AI did not influence the scientific content, study design, data analysis, data interpretation, results, or conclusions of the manuscript. Full responsibility for the content remains with the authors.

### 8.3. Conflict of Interest

The authors declare no conflicts of interest.

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