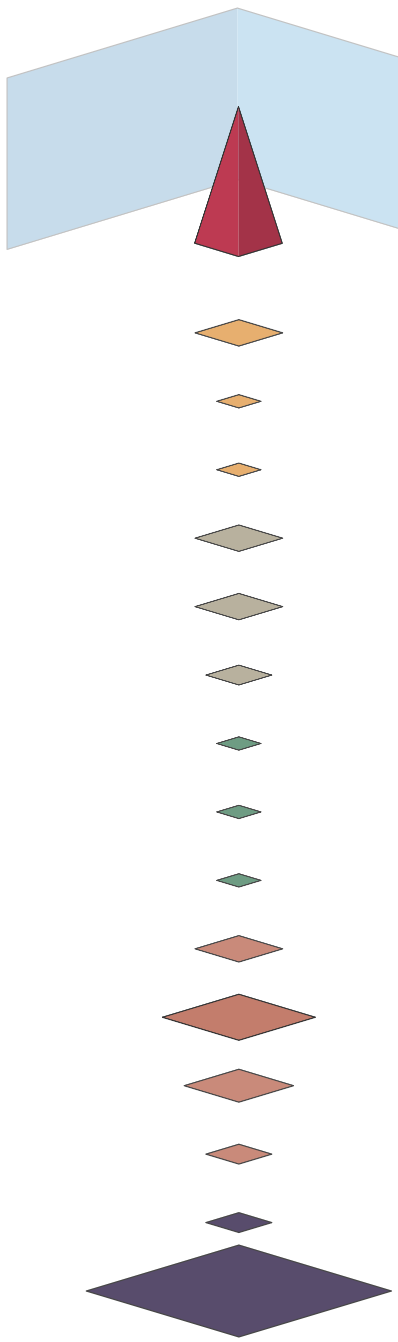
GLOBAL ORGANIZED CRIME INDEX

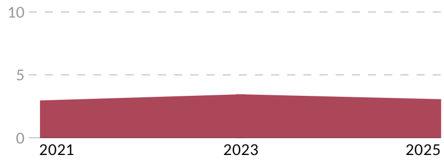
GLOBAL INITIATIVE AGAINST TRANSNATIONAL ORGANIZED CRIME

SAN MARINO



3.12 ↘0.37
CRIMINALITY SCORE

171st of 193 countries ↘3
39th of 44 European countries ↘1
7th of 8 Southern European countries -



CRIMINAL MARKETS 2.03 ↘0.33

HUMAN TRAFFICKING	2.00	0.00
HUMAN SMUGGLING	1.00	↘0.50
EXTORTION & PROTECTION RACKETEERING	1.00	↘1.00
ARMS TRAFFICKING	2.00	↘0.50
TRADE IN COUNTERFEIT GOODS	2.00	↘1.00
ILLICIT TRADE IN EXCISABLE GOODS	1.50	↗0.50
FLORA CRIMES	1.00	0.00
FAUNA CRIMES	1.00	↘0.50
NON-RENEWABLE RESOURCE CRIMES	1.00	↘0.50
HEROIN TRADE	2.00	0.00
COCAINE TRADE	3.50	↘0.50
CANNABIS TRADE	2.50	0.00
SYNTHETIC DRUG TRADE	1.50	0.00
CYBER-DEPENDENT CRIMES	1.50	↘0.50
FINANCIAL CRIMES	7.00	↘0.50

CRIMINAL ACTORS 4.20 ↘0.40

MAFIA-STYLE GROUPS	1.00	↘1.00
CRIMINAL NETWORKS	3.00	↘1.00
STATE-EMBEDDED ACTORS	5.00	0.00
FOREIGN ACTORS	6.50	0.00
PRIVATE SECTOR ACTORS	5.50	0.00

This project was funded in part by a grant from the United States Department of State.

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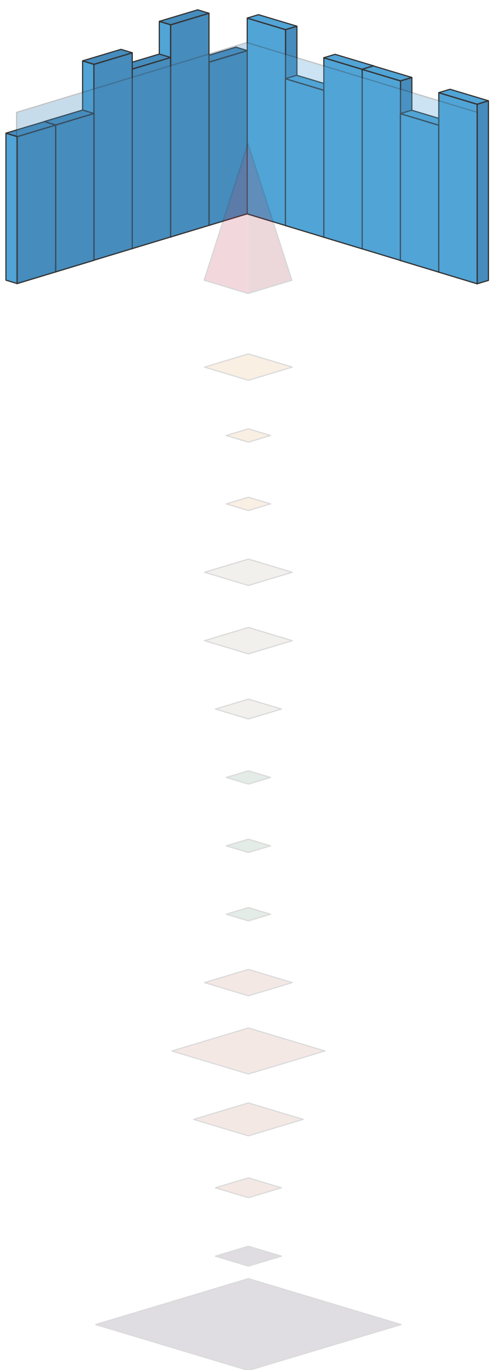
Funded by the European Union

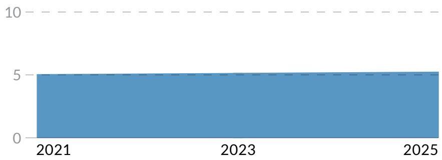
ENACT is funded by the European Union and implemented by the Institute for Security Studies and INTERPOL, in affiliation with the Global Initiative Against Transnational Organized Crime.

SAN MARINO



5.29 ↗0.08
RESILIENCE SCORE

71st of 193 countries ↗6
30th of 44 European countries ↗2
5th of 8 Southern European countries -



POLITICAL LEADERSHIP AND GOVERNANCE	**4.50**	↗0.50
GOVERNMENT TRANSPARENCY AND ACCOUNTABILITY	**4.50**	↗0.50
INTERNATIONAL COOPERATION	**6.00**	0.00
NATIONAL POLICIES AND LAWS	**5.50**	0.00
JUDICIAL SYSTEM AND DETENTION	**6.50**	0.00
LAW ENFORCEMENT	**5.00**	0.00
TERRITORIAL INTEGRITY	**6.00**	0.00
ANTI-MONEY LAUNDERING	**4.50**	0.00
ECONOMIC REGULATORY CAPACITY	**5.50**	0.00
VICTIM AND WITNESS SUPPORT	**5.50**	0.00
PREVENTION	**4.50**	0.00
NON-STATE ACTORS	**5.50**	0.00

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CRIMINALITY

CRIMINAL MARKETS

PEOPLE

San Marino experiences minimal human trafficking due to its small size, limited infrastructure and high visibility of potential victims. The country is not a primary destination, source or transit hub for trafficking. However, its proximity to the Romagna Riviera – a region known for labour exploitation – poses potential risks. In early 2024, inspections revealed exploitative labour conditions in businesses along the Riviera Romagnola, highlighting concerns over labour trafficking. Although no direct cases have been identified in San Marino, the country's reliance on foreign labour in domestic work, tourism and construction raises concerns about potential labour exploitation.

There is no evidence of human smuggling in San Marino. Its small, mountainous geography, limited infrastructure, and lack of ports, railways and airports make it unattractive for smuggling networks.

Extortion and protection racketeering cases are virtually non-existent in San Marino. No incidents were reported in 2024.

TRADE

Arms trafficking in San Marino remains negligible. The legal firearms market is highly regulated, requiring approval from the Sammarinese Gendarmerie and possession permits. Although legal transactions have slightly increased, there has been no corresponding rise in violence. In a rare recent case, authorities arrested an individual for illegal arms possession, seizing multiple firearms. However, there have been no recent indications of organized trafficking networks operating in the country. The trade in counterfeit goods remains minimal, with recent reports indicating only a small number of incidents and limited involvement of organized criminal groups. San Marino's lower excise taxes on alcohol and tobacco compared to Italy have led to the risk of smuggling activities into Italy. According to independent experts, some cases involve networks of smugglers and purposively set companies, not just individuals. However, the country is not a prominent illicit trade hub.

ENVIRONMENT

Flora crimes are non-existent in San Marino due to its small territory. No evidence suggests the presence of an illegal flora trade. There are no recent reports of fauna crimes. Similarly, there is no evidence of a market for non-renewable resource crime in San Marino.

DRUGS

San Marino has limited drug markets due to its small population. The country serves as a destination for heroin, primarily supplied by foreign mafia-style groups and loose criminal networks operating in Italy. Distribution occurs at the retail level. In 2024, authorities arrested individuals for heroin trafficking, leading to seizures of small quantities. The cocaine market is similarly small. Foreign criminal groups involved in Italy's drug trade supply small quantities to San Marino for local retail distribution. A recent case involved an individual arrested with packaged doses for sale in San Marino. Another episode involved a suspect caught at the Rimini–San Marino border with wholesale narcotics. The cannabis market remains limited. Foreign criminal groups supply the drug for local retail. Cannabis cultivation is illegal except for medical purposes, and a 2024 legal amendment reduced penalties from imprisonment to fines for possession under a certain threshold. There is no available evidence of synthetic drug trade in San Marino. The market, if present, is small and unmeasured, with no reported seizures or investigations.

CYBER-DEPENDENT CRIMES

Cyber-dependent crimes are rarely reported in San Marino, with no indication of domestic cybercriminal groups active in the country.

FINANCIAL CRIMES

San Marino has faced cyber-enabled financial fraud cases, including phishing attacks targeting businesses and individuals. Cases of redirected payments resulted in significant financial losses. Embezzlement cases have surfaced, exposing vulnerabilities in financial oversight. VAT fraud is a persistent issue. San Marino was historically considered a tax haven, facilitating tax avoidance and financial secrecy. However, since the country adopted automatic fiscal information sharing, tax avoidance has significantly declined. Despite this, San Marino remains listed among jurisdictions with potential financial secrecy risks.

CRIMINAL ACTORS

San Marino does not have any domestic mafia-style groups. Similarly, there is little publicly available information confirming the presence of domestic criminal networks in the country. Recent assessments, including Europol's latest report on major criminal networks, do not reference any significant Sammarinese criminal organizations. Unlike in neighbouring Italy, San Marino does not have a documented presence of structured or opportunistic criminal networks engaging in illicit activities such as drug trafficking, human smuggling or cybercrime. Any such operations within the country are likely facilitated by foreign actors rather than domestic networks.

Although state actors in San Marino do not directly control criminal markets, concerns have been raised regarding financial misconduct linked to political figures. Recent declarations related to an ongoing financial scandal highlighted connections between high-ranking individuals and illicit financial activities. Reports suggest that these affiliations may have sustained financial crimes at higher levels of political life, raising concerns regarding the country's political integrity and financial oversight.

Due to San Marino's small size and lack of domestic criminal groups, foreign actors, primarily from Italy, dominate its criminal markets. The porous border with Italy facilitates these operations, especially in the financial sector. Italian mafia organizations play a significant role, using San Marino's banking and financial sectors for money laundering and investment schemes. These groups have been involved in various business activities, such as the import-export sector and betting industries, as a means to launder illicit proceeds. The influence of organized crime from neighbouring Italian regions, particularly Emilia-Romagna, remains notable, with San Marino serving as an extension of their operational reach. Although previous reports mentioned the presence of Chinese and Russian criminal networks, their activities in San Marino have decreased since 2016. However, financial transactions and investments linked to foreign networks continue, raising concerns about potential illicit financial flows. Given the country's limited enforcement capacity and reliance on cross-border cooperation, foreign criminal actors continue to exploit San Marino's economic and regulatory frameworks.

The private sector in San Marino has historically played a role in facilitating financial crimes, particularly through banking institutions, legal advisory services and real estate. Although regulatory improvements have enhanced transparency in recent years, concerns persist regarding potential reversals in financial oversight following new fiscal policies introduced in 2024. Trade unions have expressed concerns about the possibility of a return to opaque banking practices that could facilitate money laundering through financial institutions. Financial advisors, lawyers and real estate brokers remain key enablers of illicit financial flows, often working in connection with foreign criminal networks. Recent reports highlight the use of Sammarinese companies by Italian organized crime groups for money laundering and asset concealment. Ongoing legal proceedings involving financial institutions in San Marino have raised concerns about the banking sector's integrity. Investigations into financial misconduct suggest vulnerabilities that could be exploited for criminal activities. Despite efforts to strengthen financial transparency, the private sector remains an area of concern in San Marino's broader efforts to combat organized crime and illicit financial flows.

RESILIENCE

LEADERSHIP AND GOVERNANCE

San Marino's political leadership has not prioritized the fight against organized crime as a central campaign issue, largely due to the nature of crime in the country, which is more oriented towards financial misconduct than traditional organized crime. Although political figures have been linked to financial scandals, there is no indication that organized crime networks directly influence the political system. The country's approach to cybersecurity remains limited, with civilian-led initiatives in place but no recent evidence of significant political emphasis on the issue. San Marino has improved its governance in recent years, performing well in terms of control of corruption, rule of law and government effectiveness. These improvements reflect strong public trust in the government and a political system that remains largely insulated from criminal influence. Despite this, challenges persist in addressing financial crimes and cyber threats, with limited institutional focus on these areas beyond general preventive measures. Government transparency and accountability have gradually improved, though San Marino lacks an independent anti-corruption body. In 2024, following recommendations from the Group of States Against Corruption (GRECO), the government implemented measures to prevent corruption in public sector recruitment. However, parliamentary oversight of the executive remains weak, and non-state or international oversight mechanisms are absent. Although budget and procurement processes have been made more transparent, GRECO has highlighted the need for a stronger institutional framework to combat corruption.

San Marino participates in international efforts to combat organized crime through its ratification of key conventions, including the European Convention on Extradition. However, it does not extradite its own citizens, limiting cooperation in certain cases. The country collaborates with international bodies such as INTERPOL and Europol, although its intelligence capabilities remain limited. San Marino has historically been slow to ratify international agreements, including the UN Convention against Transnational Organized

Crime, and has yet to ratify the UN Convention against Corruption. National policies criminalize organized crime and money laundering, in line with the country's primary risks. However, the legal framework has not been significantly updated since 2019, and concerns persist regarding new fiscal policies that may facilitate tax avoidance. In 2024, amendments to the budget law introduced fiscal residency for non-residents with lower tax rates, raising concerns about potential financial secrecy issues. Critics argue that these changes could position San Marino as a tax haven, reversing prior progress in financial transparency.

CRIMINAL JUSTICE AND SECURITY

San Marino's judicial system enforces criminal penalties effectively, with courts capable of handling organized crime cases. Recent reforms enhanced judicial transparency and independence, including prohibitions on lawmakers serving on the Judicial Council. A judicial code of ethics was also introduced and recognized as a step forward in improving integrity. The country's only prison facility operates efficiently, with alternative detention measures introduced for individuals sentenced to no more than three years. San Marino's law enforcement agencies are structured into three main bodies: the Gendarmeria, responsible for criminal investigations; the Guardia di Rocca, focused on border security; and the Polizia Civile, which handles regulatory enforcement. Specialized units addressing organized crime and terrorism financing have been operational since 2019. Although San Marino lacks a dedicated intelligence agency, it cooperates with international bodies to compensate for its limited domestic capacity. San Marino's geographical features and lack of major transit hubs make border security relatively straightforward. The country is part of Italy's customs space but is not an EU member, applying Schengen visa rules informally. San Marino's limited exposure to criminal markets reduces risks associated with territorial integrity. However, it lacks a national cybersecurity framework, relying on civilian agencies for information security.

ECONOMIC AND FINANCIAL ENVIRONMENT

San Marino has a legal framework for anti-money laundering, reinforced by legislative updates. Authorities have intensified investigations, uncovering offshore schemes that exploit the country to conceal illicit funds, often linked to organized crime. However, EU regulators have called for stronger enforcement, expressing concerns about potential financial secrecy risks, especially in the context of San Marino's evolving fiscal policies. Critics argue that its Association Agreement with the EU could facilitate the movement of illicit funds due to weaker financial oversight. Bank secrecy laws remain strict, with legal restrictions on disclosing client banking data. Although San Marino has been removed from tax haven lists, concerns persist regarding its ability to prevent financial crimes. The financial intelligence agency plays a key role in investigating money laundering and terrorist financing, though some gaps in oversight remain. San Marino's economy is small and highly influenced by external factors. The recently concluded Association Agreement with the EU is expected to enhance financial integration and regulatory cooperation. Although the regulatory environment supports business operations, high administrative costs have historically limited foreign investment. Organized crime has minimal direct impact on San Marino's economy, with no evidence of criminal control over specific sectors.

CIVIL SOCIETY AND SOCIAL PROTECTION

The country's low crime rate and absence of major organized crime groups have limited the need for dedicated support services. State agencies, including specialized law enforcement units, handle fraud and financial crime cases but do not provide structured victim assistance programmes. Individuals seeking redress for financial crimes rely on civil legal processes rather than state-supported initiatives. San Marino has no national strategy specifically targeting organized crime prevention, though it participates in bilateral agreements with Italy to combat financial crimes and money laundering. Efforts to strengthen biodiversity protection have also been noted, with improvements in land use regulations and environmental monitoring systems. The country is recognized for strong civil liberties and political rights, maintaining high rankings in international assessments. The media in San Marino is independent but faces challenges due to strict defamation laws, which can lead to self-censorship. Political tensions have influenced media freedom, with recent cases in 2024 involving political criticism of journalists reporting on criminal investigations. Despite these pressures, no physical attacks against journalists have been reported, and investigative journalism continues to operate within legal constraints. Non-state actors play a limited role in addressing organized crime due to the state's monopoly on law enforcement. However, human rights organizations and NGOs operate freely within San Marino.

This summary was funded in part by a grant from the United States Department of State. The opinions, findings and conclusions stated herein are those of the authors and do not necessarily reflect those of the United States Department of State.