



BANGKO SENTRAL NG PILIPINAS

OFFICE OF THE DEPUTY GOVERNOR
SUPERVISION AND EXAMINATION SECTOR

CIRCULAR LETTER NO. CL-2016- 011

To : All BSP-Supervised Financial Institutions

Subject: Anti-Money Laundering Council (AMLC) Resolution No. 05, Series of 2016

Please be informed that the AMLC, in its Resolution No. 5 dated 20 January 2016 (copy attached), resolved the following:

- a. Amend Resolution No. 43, Series of 2014 by:
 - Reducing the number of reportable bulk suspicious transactions from fifty (50) or more to at least five (5) suspicious transactions; and
 - Adopting a standard reporting format for the aforementioned transactions – using Format B1.
- b. Require covered persons to report, using Format B2, for fraud-related transactions involving different account holders.
- c. Adopt guidelines for Formats B1 and B2 (details in attached AMLC Resolution).

For information and guidance.


NESTOR A. ESPENILLA, JR.
Deputy Governor

18 February 2016

Att.: A/S



Republic of the Philippines
Anti-Money Laundering Council
Bangko Sentral ng Pilipinas Complex
Manila, Philippines

RESOLUTION NO. 05
Series of 2016

In the Memorandum dated 15 January 2016, the AMLC Secretariat (AMLCS) reported to the Council that:

Bulk Reporting of Multiple Suspicious Transactions

Resolution No. 43, Series of 2014, authorizes covered persons to submit fifty (50) or more suspicious transactions under one Suspicious Transaction Report STR. The authority was based on the impracticality of requiring covered persons to file STRs on each of these transactions. A case in point is when an investment scam breaks out where it is impractical for covered persons to report suspicious transactions on a daily basis.

The guidelines in Resolution No. 43, Series of 2014, require that the reportable transactions should involve the same suspicious transaction indicator, and refer to the same accountholder and account number. The guidelines also provide that the transaction details shall be included as part of the narrative (not to exceed 4,000 characters) or can be extracted as an Excel file and submitted to the AMLC as an STR attachment.

The guidelines, however, do not prescribe a standard reporting format. As a result, covered persons file the corresponding STRs in a variety of forms. The STRs that are not in the standard format could not be uploaded to the database, resulting in the difficulty of analyzing them and comparing them with related transactions in the database. Thus there is a need to revisit the guidelines.

Bulk Reporting of Multiple Fraud-Related Suspicious Transactions

The Council also receives from banks STRs relative to fraudulent transactions (fraud-related transactions) arising from:

- 1. Use of skimmed, stolen or lost credit and ATM cards;*
- 2. Mail order/telephone orders;*
- 3. Unauthorized withdrawals;*

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Anti-Money Laundering Council Secretary

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4. Point of sale-Debit; and
5. Spurious checks.

In fraud-related transactions, the victims are different account holders and the perpetrators are unknown. Yet, the filing of STRs is warranted by the fact that they are related to an unlawful activity pursuant to Section 3(b-1)(6) of the Anti-Money Laundering Act of 2001 (AMLA), as amended.

The filing of STR on each of the fraud-related transactions is impractical because of their volume. But unlike the bulk suspicious transactions described in Resolution No. 43, Series of 2014, the fraud-related transactions involve different accounts of different account owners. Thus the reporting thereof is not covered by the said Resolution.

Consultation:

The AMLC Secretariat held a consultation with the stakeholders on the reporting format under Resolution No. 43, Series of 2014. A similar consultation was held on the issue of bulk reporting of fraud-related transactions under one STR.

It was agreed that the reporting format under Resolution No. 43, Series of 2014 be streamlined along with the formulation of a reporting format for fraud-related transactions involving different account holders as victims. It was likewise agreed that in both formats, the number of reportable transactions under one STR shall be at least five (5) suspicious transactions.

The Council resolved to:

1. Amend Resolution No. 43, Series of 2014 by:
 - i. Reducing the number of reportable bulk suspicious transactions from fifty (50) or more to at least five (5) suspicious transactions;
 - ii. Adopting a standard reporting format for the aforementioned transactions— using Format B1 (**Annex A** hereof).
2. Require covered persons to report, using Format B2 (**Annex B** hereof), for fraud-related transactions involving different account holders.
3. Adopt the following guidelines for Format B1 and B2:
 - i. In both formats, the first row should contain all details/fields common to all transactions, and the

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Anti-Money Laundering Council Secretary

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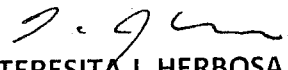
- succeeding rows should contain the details of the transactions;
- ii. The filename format should follow the convention of a regular STR;
 - iii. Files should be saved as CSV and be encrypted;
 - iv. The STR should be uploaded in the AMLC portal like a regular STR;
 - v. For Format B2, transactions should be limited to those with Transaction Codes where the mandatory party is the account holder and the subject of suspicion is unknown; and
 - vi. In all cases, covered persons have the option to file STR on each suspicious transaction, or in bulk pursuant to the herein guidelines.

4. Request the Bangko Sentral ng Pilipinas, the Securities and Exchange Commission and Insurance Commission, to disseminate copies of this Resolution to covered persons under their supervisory authority.

20 January 2016, Manila, Philippines.


AMANDO M. TETANGCO, JR.

Chairman
(Governor, Bangko Sentral ng Pilipinas)


TERESITA J. HERBOSA

Member
(Chairperson, Securities and Exchange Commission)


EMMANUEL F. DOOC

Member
(Commissioner, Insurance Commission)

ANNEX A

Bulk Reporting under AMLC Resolution 43 Series of 2014 (B1)

FIRST ROW

Column	FIELD NAME	TYPE	LENGTH	FORMAT	VALUE/REMARKS
A1	Format Code	Text	4	X(2)	B1
B1	Submission Type	Text	1	X(1)	A- add, E- edit, D- delete, T-test
C1	Report Date	Number	8	9(8)	yyyymmdd
D1	Account Number	Text	40	X(40)	
	Name	Text			
E1	Last Name		30	X(30)	Last name of account holder
F1	First Name		30	X(30)	First name of account holder
G1	Middle Name		30	X(30)	Middle name of account holder
	Address				
H1	Address1		50	X(50)	Room No./Office Name, Bldg./ House No., Street, Subd./ Brgy.
I1	Address2		50	X(50)	District, Town, City
J1	Address3		30	X(30)	Province, Country code, ZIP
K1	Birthdate/Registration Date	Number	8	9(8)	YYMMDD
L1	Place of Birth/Registration	Text	90	X(90)	City, Municipality, Country
M1	Nationality	Text	40	X(40)	
N1	ID Type	Text	4	X(4)	ID1 – Passport ID2 – Driver's License <i>pls refer to AMLC's manual for complete list</i>
O1	Identification No.	Text	30	X(30)	
P1	Nature of Business	Text	35	X(35)	
Q1	Reason	Memo	800		Reason for Suspicion SI1- There is no underlying legal or trade obligation, purpose or economic justification. SI2- The client is not properly identified. SI6- The transaction is similar, analogous or identical to any of the foregoing. (Additional reason is required after a semicolon ie. SI6;The client is...) PC1- Kidnapping for ransom PC2- Drug trafficking and related offenses PC3- Graft and corrupt practices <i>pls refer to AMLC's Reporting Procedures manual for the complete list</i>
R1	Narrative	Memo	4000		Narrative of events leading to Suspicion

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Anti-Money Laundering Council Secretary

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Details of the transactions (Starting at row 2)

Column	FIELD NAME	TYPE	LENGTH	FORMAT	VALUE/REMARKS
A	Party type Flag of Subject (Name indicated in Row1)	Text	1	X	A – Account Holder; B – Beneficiary; C – Counterpart <i>(pls refer to the AMLC Reporting Procedures Manual for a complete list)</i>
B	Institution Code	Number	11	9(11)	As provided by AMLC (Institution code of the branch where the transaction took place)
C	Transaction Date	Number	8	9(8)	yyyymmdd
D	Transaction Code	Text	5	X(5)	AMLC Transaction Codes
E	Transaction Reference No.	Text	20	X(20)	must be unique per tran date
F	Transaction Amount (Php)	Number	20	9(18).99	Greater than 0 w/ or w/o decimal value
G	Transaction Amount (FX)	Number	17	9(15).99	Optional
H	FX Currency Code	Text	3	X(3)	optional; mandatory if fx amount <> null
I	Name of Correspondent Bank	Text	90	X(90)	
J	Address1		50	X(50)	Room No./Office Name, Bldg./ House No., Street, Subd./ Brgy.
K	Address2		50	X(50)	District, Town, City
L	Address3		30	X(30)	Province, Country code, ZIP
M	Country Code of Correspondent Bank	Number	3	9(3)	Country Code (Please refer to system codes in the AMLC Reporting Procedures Manual)

For transactions involving multiple parties continue with Columns N,O,P,.....

Column	FIELD NAME	TYPE	LENGTH	FORMAT	VALUE/REMARKS
N	Party Type Flag	Text	1	X	A – Account Holder; B – Beneficiary; C – Counterpart <i>(pls refer to the AMLC Reporting Procedures Manual for a complete list)</i>
	Name	Text			
O	Last Name		30	X(30)	Last name of account holder
P	First Name		30	X(30)	First name of account holder
Q	Middle Name		30	X(30)	Middle name of account holder
	Address				
R	Address1		50	X(50)	Room No./Office Name, Bldg./ House No., Street, Subd./ Brgy.
S	Address2		50	X(50)	District, Town, City
T	Address3		30	X(30)	Province, Country code, ZIP
U	Birthdate/Registration Date	Number	8	9(8)	YYMMDD
V	Account Number	Text	40	X(40)	

Rules on Mandatory Fields still applies (See Annex F for the guidelines)

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Anti-Money Laundering Council Secretary

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ANNEX B

Bulk Reporting Electronic Record Format (BLK2)

FIRST ROW

Column	FIELD NAME	TYPE	LENGTH	FORMAT	VALUE/REMARKS
A1	Format Code	Text	4	X(2)	B2
B1	Submission Type	Text	1	X(1)	A- add, E- edit, D- delete, T-test
C1	Report Date	Number	8	9(8)	YYYYMMDD
D1	Reason	Memo	800		Reason for Suspicion SI1- There is no underlying legal or trade obligation, purpose or economic justification. SI2- The client is not properly identified. SI6- The transaction is similar, analogous or identical to any of the foregoing. (Additional reason is required after a semicolon ie. SI6;The client is...) PC1- Kidnapping for ransom PC2- Drug trafficking and related offenses PC3- Graft and corrupt practices <i>pls refer to AMLC's Reporting Procedures manual for the complete list</i>
E1	Narrative	Memo	4000		Narrative of events leading to Suspicion

Details of the transactions (Starting at row 2)

Column	FIELD NAME	TYPE	LENGTH	FORMAT	VALUE/REMARKS
A	Institution Code	Number	11	9(11)	As provided by AMLC (Institution code of the branch where the transaction took place)
B	Transaction Date	Number	8	9(8)	yyyymmdd
C	Transaction Code	Text	5	X(5)	AMLC Transaction Codes
D	Transaction Reference No.	Text	20	X(20)	must be unique per tran date
E	Account Number	Text	40	X(40)	
F	Transaction Amount (Php)	Number	20	9(18).99	Greater than 0 w/ or w/o decimal value
G	Transaction Amount (FX)	Number	17	9(15).99	Optional
H	FX Currency Code	Text	3	X(3)	optional; mandatory if fx amount <> null
	Name	Text			
I	Last Name		30	X(30)	Last name of account holder
J	First Name		30	X(30)	First name of account holder
K	Middle Name		30	X(30)	Middle name of account holder
	Address				
L	Address1		50	X(50)	Room No./Office Name, Bldg./ House No., Street, Subd./ Brgy.
M	Address2		50	X(50)	District, Town, City
N	Address3		30	X(30)	Province, Country code, ZIP
O	Birthdate	Number	8	9(8)	YYMMDD

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MA. ARICK SANTOS-MENDOZA
 Anti-Money Laundering Council Secretary

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