



BANGKO SENTRAL NG PILIPINAS

OFFICE OF THE DEPUTY GOVERNOR IFINANCIAL SUPERVISION SECTOR

MEMORANDUM NO. M-2025-006

To : **All BSP-Supervised Financial Institutions (BSFIs)**

Subject : **Reminder Against Possible Proliferation of Vote-Buying, Vote-Selling, and Abuse of State Resources in Election Schemes**

In line with the Government and the Commission on Election's (COMELEC) efforts to curb vote-buying, vote-selling, and abuse of state resources (ASR) in the conduct of elections¹, especially in the upcoming 2025 elections², the BSP strongly calls for the adoption of enhanced surveillance and monitoring measures to prevent the misuse of financial institutions as conduits for these illegal activities. BSFIs are likewise urged to tighten their existing controls in detecting or preventing the possible influx of fraudulent accounts and transactions as the election date approaches.

To mitigate the heightened risk of the possible abuse or misuse of digital channels (i.e., online banking, mobile wallet applications) in vote-buying/selling activities and ASRs in the conduct of elections, BSFIs should reinforce their measures and controls to ensure that appropriate customer onboarding processes, effective fraud management system (FMS) and ongoing account and transaction monitoring capabilities, are commensurate to respond against these fraudulent activities. BSFIs should consider the following possible scenarios in calibrating their FMS and account and transaction monitoring rules/parameters:

1. Concentration and/or significant number of account registrations in the area or locality where vote-buying/selling and ASR in the conduct of elections is identified to be rampant;
2. Large cash transactions and/or encashment of checks during election period;
3. Unusual transaction flows between accounts, digital banking and digital wallets, including the velocity and frequency of transactions (i.e., many-to-one, one-to-many); or
4. Unusual volume and/or value in cash in/cash out channels (agents).

Pursuant to Section 922 of the Manual of Regulations for Banks/Section 922-Q of the Manual of Regulations for Non-Bank Financial Institutions, in relation to Section 3 (b-1) and Section 9(c) of the Anti-Money Laundering Act of 2001, as amended, and Section 1, Rule 3 and Rule 22 of its 2018 Implementing Rules and Regulations, BSFIs should submit suspicious transaction reports to the Anti-Money Laundering Council, when warranted, after due investigation of complex, unusually large transactions, unusual patterns of transactions, which have no underlying legal/trade obligation, purpose or economic justification, or the amount involved is not commensurate with the business or financial profile of the client, and other pattern of transactions indicative of vote-buying and vote-selling, and ASR in elections, money laundering and/or terrorism financing.

For information, guidance, and implementation.

 Digitally signed by
Chuchi G. Fonacier
Date: 2025.03.23
23:16:01 +08'00'

CHUCHI G. FONACIER
Deputy Governor

23 March 2025

¹ The COMELEC issued Resolution No. 11104 dated 28 January 2025, expanding the powers and functions of the Committee on Kontra Bigay (created under COMELEC Res. No. 10946 dated 30 August 2023) and to integrate guidelines against abuse of state resources in the conduct of elections in connection with the 12 May 2025 National and Local Elections (NLE) and Bangsamoro Autonomous Region in Muslim Mindanao Parliamentary Elections (BPE) and subsequent NLE and BPE.

² 12 May 2025 NLE and 13 October 2025 BPE