



BANGKO SENTRAL NG PILIPINAS

OFFICE OF THE GOVERNOR

CIRCULAR NO. _____ Series of 2023

Subject: **Amendments to Section 911/911Q of the Manual of Regulations for Banks (MORB)/Manual of Regulations for Non-Bank Financial Institutions (MORNBI) - Money Laundering (ML)/Terrorist Financing (TF)/Proliferation Financing (PF) Risk Reporting and Notification Requirements**

The Monetary Board, in its Resolution No. ____ dated ____ 2023, approved the amendments to the provisions of Section 911 of the Manual of Regulations for Banks (MORB) and Section 911-Q of the Manual of Regulations for Non-Bank Financial Institutions (MORNBI)¹ covering the ML/TF/PF risk reporting and notification requirements for BSP-supervised financial institutions (BSFIs). This shall enable the Bangko Sentral to have accurate and timely information on current ML/TF/PF risk and context information as well as significant risk events arising from ML/TF/PF-related activities and/or transactions as part of its risk-based anti-money laundering and countering the terrorism and proliferation financing (AML/CTPF) supervision.

Section 1. Sections 911/911Q of the MORB/MORNBI are hereby amended to read as follows:

911 RISK MANAGEMENT

All covered persons shall develop sound risk management policies and practices to ensure that risks associated with ~~ML/TF~~ ML/TF/proliferation financing (PF) such as reputational, operational, and compliance risks are identified, assessed, monitored, mitigated and controlled, as well as to ensure effective implementation of this Part, to the end that covered persons shall not be used as a vehicle to legitimize proceeds of unlawful activity or to facilitate or finance terrorism and proliferation of weapons of mass destruction. This shall include, among others, adoption of proportionate mechanisms to timely detect significant threats or key sources of ML/TF/PF risks events which may warrant reporting/notification to the Board of Directors and/or Senior Management and to the BSP.

x x x

Risk Assessment. x x x

New products and business practices risk assessment. x x x

ML/TF/PF Risk Reporting and Notification Requirements. The sound management of ML/TF/PF risks is critical in ensuring the sustained resilience and integrity of the financial system in general as well as the safety and soundness of the BSFIs in particular. A critical component of a BSFI's risk assessment and management process is the timely collection and analysis of relevant data, including risk events. In this regard, BSFIs shall submit regular and event-driven ML/TF/PF-related reports covering data on their current ML/TF/PF risk

¹ In relation to Sections 601-S/501-P/601-N for other NBFIs.

and context information as well as significant risk events arising from ML/TF/PF-related incidents or activities that may have a material effect to the BSFI and/or the financial system. These reports shall enable the Bangko Sentral to proactively and holistically identify and assess the BSFI's current level and direction of risks relating to ML/TF/PF and the extent of the sector's vulnerabilities to ML/TF/PF activities. These will also inform necessary supervisory activities in response to emerging risks.

a. **Reporting requirement.** BSFIs are required to submit to the Bangko Sentral the following reports:

- (1) Annual Anti-Money Laundering/Countering the Terrorism and Proliferation Financing Reporting Package (ARP). BSFIs shall submit the duly accomplished ARP, as listed in *Appendix 7*, to the appropriate supervising department of the Bangko Sentral within 30 banking days after the end of the reference year.
- (2) ML/TF/PF Risk Event Report. BSFIs shall notify the Bangko Sentral within twenty-four (24) hours from date of knowledge of any significant ML/TF/PF risk event. It covers reporting of ML/TF/PF-related incident that may present material and adverse impact on the BSFI, the financial system's posture or erode public confidence therein. This reporting shall form part of the BSFI's incident management plan.

A ML/TF/PF risk event is reportable, if based on the BSFI's assessment, the incident has a material impact on the BSFI and/or the financial system such as those affecting significant number of customers or counterparties, with cross-border element, or those covered/may be covered in adverse media reports.

b. **Procedures for reporting to Bangko Sentral.** Detailed guidelines on the preparation and submission of ARP and ML/TF/PF Risk Event Report are set forth under *Appendices __ and __, respectively (Annexes A and B of this Circular)*.

The BSP may require the BSFI to provide additional information, documents, and/or updates, as necessary, until the reported risk event is resolved. The BSP may also conduct special or overseeing examination, as warranted, to verify, among others, the root cause of the incident, assess the impact to the BSFI and/or the financial system, if any, and identify areas for improvement to strengthen overall ML/TF/PF risk management framework.

c. **Supervisory Enforcement Actions.** An ARP which has been considered as erroneous, delayed, and/or unsubmitted shall be subject to appropriate penalties for Category B reports under Sections 171/172-Q/162-S/161-P/143-N.

Non-compliance with the reporting requirements under item a(2) on Risk Even Report will be subject to "High" penalty level monetary sanctions pursuant to Section 1102/1102-Q.

Further, consistent with Sections 002/002-Q/002-S/002-P/001-N/002-T, the Bangko Sentral may deploy its range of enforcement actions to promote adherence to the requirements set forth in this Section and bring about timely corrective actions. Monetary and non-monetary sanctions, as provided under existing laws, Bangko Sentral rules and regulations, may likewise be imposed on the BSFI and/or

its directors, officers and/or employees for violation of the reporting requirements.

Section 2. Appendix 7/Q-3/S-2/P-7/N-1/T-4 of the MORB/MORNBFI is hereby amended to include the following:

Category	Form No.	MOR Ref.	Report Title	Frequency	Submission Deadline	Submission Procedure/ e-mail Address
B	Unnumbered	Section 911/911Q	Anti-Money Laundering/Counter ing the Terrorism and Proliferation Financing Reporting Package	Annually	Within 30 banking days after the end of the reference year	fsid-arp-ukb@bsp.gov.ph fsid-arp-tb@bsp.gov.ph fsid-arp-rcb@bsp.gov.ph fsid-arp-nbfi@bsp.gov.ph
B	Unnumbered	Section 911/911Q	ML/TF/PF Risk Event Report	As risk event/ incident occurs	Within twenty-four (24) hours from knowledge thereof	fsid-rr@bsp.gov.ph

Section 3. Transitory Provision. The initial submission of the Annual ARP with reference year 31 December 2022 shall be due on 30 June 2023. Subsequent submissions of the Annual ARP shall follow the prescribed timeline provided in this Circular.

On the other hand, reporting of ML/TF/PF risk event shall cover incidents occurring upon effectivity of this Circular.

The foregoing provision shall be incorporated as a footnote to Section 911/911-Q of the MORB/MORNBFI.

Section 4. Effectivity. This Circular shall take effect fifteen (15) calendar days following its publication either in the Official Gazette or in a newspaper of general publication.

FOR THE MONETARY BOARD:

FELIPE M. MEDALLA
Governor

_____ 2023

**GUIDELINES ON THE ELECTRONIC SUBMISSION OF ANTI-MONEY
LAUNDERING/COUNTERING THE TERRORISM AND PROLIFERATION FINANCING
REPORTING PACKAGE (ARP)**

***(Appendix to item a (1) of Section 911/911Q of the Manual of Regulations for Banks
[MORB]/ Manual of Regulations for Non-Bank Financial Institutions [MORNBFI]
on Reporting and Notification Requirements)***

1. The following BSP Supervised Financial Institutions (BSFIs) shall submit the required annual ARP within the prescribed timeline:
 - a. Banks and quasi banks, including their subsidiaries and affiliates,
 - b. Stand-alone trust corporations,
 - c. Non-stock savings and loan associations,
 - d. Money service businesses (foreign exchange dealers, money changers, remittance and transfer companies),
 - e. Non-bank electronic money issuers,
 - f. Virtual asset service providers, and
 - g. Stand-alone credit card issuer.
2. All BSFIs shall use the prescribed ARP *Microsoft Forms (Annex A-1)* and *Data Entry Templates (DET) (Annex A-2)*¹ and its corresponding *Control Prooflist (CP) (Annex A-3)* which can be accessed and downloaded from https://www.bsp.gov.ph/ses/reporting_templates
3. The ARP shall be submitted on an annual basis (i.e.g, within thirty (30) banking days from the end of reference year) subject to the transitory provision for the first report.
4. The ARP shall supersede the existing Survey Questionnaire required under the AML Risk Rating System (ARRS) issued through Memorandum No. M-2012-017 dated 4 April 2012.
5. The electronic submissions shall be transmitted to the prescribed e-mail addresses, as follows:

Type of Institution	E-mail Address
Universal/Commercial banks	fsid-arp-ukb@bsp.gov.ph
Thrift Banks	fsid-arp-tb@bsp.gov.ph
Rural/Cooperative Banks	fsid-arp-rcb@bsp.gov.ph
Non-Bank Financial Institutions	fsid-arp-nbfi@bsp.gov.ph

Using the following prescribed format as subject:

¹ Part I – Anti-Money Laundering/Countering the Terrorism and Proliferation Financing (AML/CTPF) Questionnaire

² Part II – AML/CTPF Data

**ARP<underscore><BSFI Acronym<underscore><Reference period in DD
MMM YYYY>**

For example,

To : *fsid-arp-ukb@bsp.gov.ph*

Subject : *ARP_ABCKB_31 Dec 2022*

5. The DET and the CP shall be submitted using the prescribed file naming convention and file extension/format, as identified below:

File	File Name	File Extension/Format
CP	ARP 1_BSFI Acronym_CP_Reference period in DD MMM YYYY	.PDF
DET	ARP 2_BSFI Acronym_Reference period in DD MMM YYYY	.XLSM

6. BSFIs that are unable to transmit via e-mail can submit the DET and CP in any encrypted portable storage device (e.g. USB flash drive) through messenger or postal services within the prescribed deadline addressed to:

The Director

Financial System Integrity Department
Bangko Sentral ng Pilipinas
5th Floor, Multi-Storey Building
BSP Complex, A. Mabini Street, Malate
1004 Manila

7. Report submissions should continue to comply with the existing BSP reporting standards. It likewise follows that only files compliant with the prescribed form by the BSP for the report shall be accepted, and validated, subject to applicable penalties for reporting violations.
8. Queries regarding ARP and its related regulations may be coursed through prescribed emails mentioned above with the following format as subject:

**ARP<underscore><Name of BSFI><underscore><Short Title of
Query/Concern>**

ANTI-MONEY LAUNDERING/COUNTERING THE TERRORISM AND PROLIFERATION FINANCING REPORTING PACKAGE

Introduction

The Anti-Money Laundering/Countering the Terrorism and Proliferation Financing Reporting Package (ARP) aims to periodically gather relevant and updated data and information related to money laundering (ML), terrorist financing (TF), and proliferation financing (PF) risks of BSP-Supervised Financial Institutions (BSFIs). These will inform the BSP's risk-based Anti-Money Laundering/CTPF supervisory activities, such as identification and assessment of the BSFI's current level and direction of risks relating to ML/TF/PF as well as the extent of their vulnerabilities to ML/TF/PF activities. This is also essential in the continuous assessment of ML/TF/PF risks in the financial system and the conduct of sectoral, national and/or institutional risk assessments.

Legal Basis

Section 3 of Republic Act (RA) No. 7653, as amended, otherwise known as "The New Central Bank Act", as amended, provides for the supervisory and/or regulatory/examination powers of the BSP over banks, quasi-banks, trust entities, money service businesses, credit granting businesses, and other financial institutions under its jurisdiction. Section 4 of RA No. 8791 defines the scope of the BSP's supervisory powers, which include, among others, the issuance of rules of conduct or the establishment of standards of operation for uniform application to all institutions or functions covered.

Rule 7 of the Revised Implementing Rules and Regulations of the Anti-Money Laundering Act, as amended, also provides that the Supervising Authorities (SAs), which include the BSP, shall, among others, i) supervise, assess and monitor compliance with AML/CTF requirements, through the conduct of AML/CTF inspection, examination, audit, or such other mechanism the SAs deem appropriate; and ii) require the submission of necessary information and documentation on AML/CTF compliance.

Report Structure

Part I. Anti-Money Laundering/Countering Terrorism and Proliferation Financing (AML/CTPF) Questionnaire

- A. Organizational Information
- B. ML/TF/PF Risk Management
 - i. Board and Senior Management Oversight
 - ii. Money Laundering, Terrorist Financing and Proliferation Financing Prevention Program (MTPP)
 - iii. Specific Processes/control mechanisms on AML/CTPF
- C. Self-Assessment System
- D. Risk Indicators

Part II. AML/CTPF Data

Schedule	Description
Schedule 1	Products and Services
Schedule 2	Customer Profile and Geographic Location
Schedule 3	Delivery Channels and Servicing Methods
Schedule 4	Targeted Financial Sanctions (TFS) Implementation
Schedule 5	Training Profile

The required information shall be provided accurately, completely and in the prescribed data format. Do not leave blank entries. Indicate "N/A" if not applicable.

Name of BSFI: _____
 BSFI Code: _____
 For the year ended: _____
 Prepared by: (Name) _____; (Designation) _____

Part I. Anti-Money Laundering/Countering Terrorism and Proliferation Financing (AML/CTPF) Questionnaire

A. Organizational Information

I. Organization Structure for AML/CTPF

Manpower Complement	No. of Approved Positions	No. of Filled Up Positions
Total Number of Manpower Complement		
Number of Personnel assigned as 1 st Line of Defense (e.g., frontline personnel, business operations)		
Number of Personnel assigned as 2 nd Line of Defense (e.g., compliance units, risk management personnel)		
Compliance Office (excluding AML Compliance Unit)		
AML Compliance Unit		
Number of Personnel assigned as 3 rd Line of Defense (e.g., internal audit)		
Internal Audit		
In-house		
Outsourced (indicate name of service provider instead of no. of positions)		
Other Control Unit with AML function, if applicable (e.g., Quality Assurance)		

II. AML/CTPF Oversight Committee (or its equivalent)

Committee Responsible for Oversight on AML/CTPF: _____
 Head/Chairperson of the Committee (Last Name, First Name, M.I.): _____
 Members (Last Name, First, M.I.): 1. _____
 2. _____
 3. _____

Frequency of Meeting:
 a. Monthly
 b. Quarterly
 c. Annually
 d. Others (Specify) _____

B. ML/TF/PF Risk Management

I. Board and Senior Management Oversight

Corporate Governance

- What are the AML/CTPF-related data/information reported to/discussed with the Board of Directors (BOD) or board-level committee? Mark all applicable items.

- ☐ Results of institutional risk assessment (IRA) including sanctions risk
- ☐ ML/TF/PF emerging risks, trends and typologies
- ☐ Compliance testing results
- ☐ Audit/examination results
- ☐ Summary report on alerts monitoring and disposition, and suspicious and covered transaction reports filed
- ☐ Status of actions taken on BSP Directives
- ☐ AML/CTPF compliance of subsidiaries, as applicable
- ☐ Newly issued regulations (including gap/impact analysis and revisions to MTPP)
- ☐ Anti-Money Laundering Council (AMLC) inquiries, freeze orders (FOs) and TFS implementation
- ☐ Training Updates/Status
- ☐ Others (Specify, include all other AML/CTPF-related topics) _____

2. How often are AML/CTPF reports, including for TFS, provided to the Board or Board-level committee?

- ☐ Monthly ☐ Quarterly ☐ Annually ☐ Others (Specify) _____

IRA¹

1. Have you conducted/completed your IRA, including sanctions risk?

- ☐ Yes ☐ No

1.1 If yes, kindly provide the following information on the latest IRA:

a) Period covered: _____

b) Date approved: _____

1.2 If yes, what is the institution's assessment of its net/residual ML, TF, PF and sanctions risks?

ML	TF	PF	Sanctions/ TFS
<input type="checkbox"/> Net Risk: _____ <input type="checkbox"/> Not assessed	<input type="checkbox"/> Net Risk: _____ <input type="checkbox"/> Not assessed	<input type="checkbox"/> Net risk: _____ <input type="checkbox"/> Not assessed	<input type="checkbox"/> Net risk: _____ <input type="checkbox"/> Not assessed
Primary Risk Drivers (select applicable): <input type="checkbox"/> Customers <input type="checkbox"/> Products and services <input type="checkbox"/> Delivery Channel <input type="checkbox"/> Geographic Location <input type="checkbox"/> Quality of Risk Management (QRM) <input type="checkbox"/> Others. Specify: _____	Primary Risk Drivers (select applicable): <input type="checkbox"/> Customers <input type="checkbox"/> Products and services <input type="checkbox"/> Delivery Channel <input type="checkbox"/> Geographic Location <input type="checkbox"/> QRM <input type="checkbox"/> Others. Specify: _____	Primary Risk Drivers (select applicable): <input type="checkbox"/> Customers <input type="checkbox"/> Products and services <input type="checkbox"/> Delivery Channel <input type="checkbox"/> Geographic Location <input type="checkbox"/> QRM <input type="checkbox"/> Others. Specify: _____	Primary Risk Drivers (select applicable): <input type="checkbox"/> Customers <input type="checkbox"/> Products and services <input type="checkbox"/> Delivery Channel <input type="checkbox"/> Geographic Location <input type="checkbox"/> QRM <input type="checkbox"/> Others. Specify: _____

1.3 If no, kindly provide the following information:

a) Status and expected date to complete IRA: _____

b) Indicate reason/s for the absence of IRA: _____

2. Who leads the conduct and/or updating of IRA?

- ☐ Compliance Office
☐ Risk Management Unit
☐ Internal Audit

¹ Kindly attach a summary report of the latest IRA conducted

- ☐ Business Units
- ☐ Others (Specify) _____

2.1 If the IRA lead is other than Compliance Office, what is the role of the Compliance Office in the conduct/updating of IRA: _____

2.2 Other units involved in the conduct/updating of IRA.

- ☐ Compliance Office
- ☐ Internal Audit
- ☐ Business Units
- ☐ Others (Specify) _____

3. How frequent do you update your IRA?

- ☐ Annually
- ☐ Every two years
- ☐ Risk-based
- ☐ Others (Specify) _____

3.1 Kindly indicate the scenarios or triggers for updating IRA based on MTPP. _____

4. What actions/measures did your institution undertake upon completion of the IRA? Mark all applicable items.

- ☐ Updated policies and guidelines in line with the risk assessment
- ☐ Improved training materials to capture the results of the risk assessment
- ☐ Conducted targeted trainings
- ☐ Heightened monitoring and/or recalibrated AML/CTPF systems such as monitoring tool to include new parameters and scenarios
- ☐ Re-defined risk appetite
- ☐ Others (Specify) _____

5. What is the methodology for assessing ML/TF/PF risks arising from new products and services? _____

6. Enumerate new products and/or services that were covered in the risk assessment? _____

II. Money Laundering and Terrorist Financing Prevention Program (MTPP)

1. How often do you update your policies, program, and procedures? Kindly mark all applicable items.

- | | |
|---|--|
| <input type="checkbox"/> After conducting the IRA to incorporate controls to mitigate the identified risk | <input type="checkbox"/> Whenever there are relevant AML/CTPF trends and/or developments |
| <input type="checkbox"/> Annually | <input type="checkbox"/> Others (Specify) _____ |
| <input type="checkbox"/> Every 2 years | |
| <input type="checkbox"/> Whenever there are new issuances/updates to relevant regulations | |

2. How are the provisions of the MTPP disseminated to officers and staff? Mark all applicable items.

- | | |
|--|--|
| <input type="checkbox"/> E-mail communication | <input type="checkbox"/> Digital library within the intranet |
| <input type="checkbox"/> Memorandum to all concerned units | <input type="checkbox"/> During meetings/regular huddles |
| <input type="checkbox"/> Compliance advisories/bulletins | <input type="checkbox"/> During outreach/training sessions |
| | <input type="checkbox"/> Others (Specify) _____ |

3. When was the latest version of the MTPP approved by the Board? _____

4. Do you implement a group-wide MTPP?

☐ Yes ☐ No ☐ Not applicable

4.1 If yes, how do you mitigate risks related to a particular jurisdiction where you have operations/branches?

- ☐ Branches are mandated to update and localize their existing AML Manuals to incorporate applicable laws and regulations.
- ☐ The Institution adopts existing policy and/or stricter rules in the jurisdiction where it has presence.
- ☐ Others (Specify) _____

5. What are the topics covered in your MTPP? Mark all applicable items.

- ☐ IRA
- ☐ Customer acceptance and identification process
- ☐ Ongoing customer and transaction monitoring
- ☐ Alerts management and disposition
- ☐ Reporting of covered and suspicious transactions
- ☐ Compliance Program
- ☐ Internal audit system and program
- ☐ Know your Employee
- ☐ Implementation of TFS
- ☐ Handling of FOs, bank inquiries and asset preservation orders
- ☐ AML/CTPF training program
- ☐ Record keeping and retention
- ☐ Control measures for specific customers/products/services
- ☐ Mechanism to ensure deficiencies noted during audit and/or BSP examination are immediately corrected
- ☐ Cooperation with the AMLC and BSP
- ☐ Policies for sharing information required for customer due diligence (CDD) and risk management purposes
- ☐ Others, specify _____

III. Specific Processes/Control Mechanisms on AML/CTPF

Customer Identification and Verification

1. Does your institution utilize a data entry system for encoding customer information upon onboarding?

☐ Yes. (Indicate name of application system): _____

☐ No

2. Who approves the opening of high-risk accounts? _____

3. How is customer verification conducted? Mark all applicable items.

Verification Process	Individual	Juridical	Legal Arrangements ²
1. Verification of valid IDs, and other proof of identification	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Corporate registration search	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

² Legal arrangements refer to express trusts or other similar legal arrangements. Source: Glossary of the FATF Recommendations (Examples include trust entity, other fiduciary business, agency, advisory/consultancy, and special purpose trust, among others)

3. Visit client's place of business	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Third party commercial databases	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Sending of Thank you/Welcome letter	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Others, please specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5. For purposes of identifying beneficial owners (BOs), what percentage of ownership is used to indicate control over the corporate client?

☐ 20%

☐ 25%

☐ Others. Please specify and explain the basis thereof.

☐ Not applicable

6. What measures/practices are performed to validate BO information? Mark all applicable items.

☐ Cross-checking against reliable, independent source, documents or information (ex. General Information Sheet submitted by the client, etc.)

☐ Accessing a BO registry

☐ Open source/ Internet searches

☐ Third party commercial databases. Name of the third-party provider: _____

☐ Others (Specify) _____

7. What is your policy or actions to be taken in case BO cannot be identified during onboarding?

☐ Deny opening of account

☐ Open the account and tag as high risk

☐ Open the account subject to regular/normal risk profiling procedures

☐ Others, please specify

Customer Risk Profiling

1. What are the factors considered in the customer risk profiling? Mark all applicable items.

☐ Nature of the products/services to be availed

☐ Purpose of the account or transaction

☐ Source of funds/wealth

☐ Nature of business, employment

☐ Public or high profile position of customer, or its directors/trustees, stockholders, officers and/or authorized signatory

☐ Jurisdiction/country of origin/residence/operation

☐ Existence of suspicious transaction indicators

☐ Sanctioned/Watchlist individuals and entities engaged in illegal or terrorist-related activities

☐ Expected amount of funds to be deposited or size of transactions

☐ Regularity or duration of the transaction

☐ Other factors, pls specify: _____

2. Is your customer risk profiling built-in in the customer information system?

☐ Yes ☐ No

2.1 If yes, what is the system used:

☐ Owned/in-house developed system: _____

☐ Third party commercial database. Kindly provide the name of the database: _____

☐ Others, specify: _____

2.2 If no, what are the controls to ensure conduct of customer risk profiling?

Non-accountholders or walk-in clients

1. Does your institution provide services to non-accountholders or walk-in/occasional clients (or those who do not maintain an account with the BSFI)?

☐ Yes ☐ No

1.1. If yes, what are the usual products/services/transactions? Mark all applicable items.

- ☐ Foreign exchange
- ☐ Remittance/wire transfers
- ☐ Check encashments
- ☐ Purchase of manager's check/cashier's checks
- ☐ Purchase of real and other properties acquired
- ☐ Others, specify: _____

1.2. If yes, what are the control measures on transactions with non-accountholders/walk-in/occasional clients?

Politically-Exposed Persons (PEPs)

1. How do you identify PEPs?

- ☐ Owned/in-house developed database
- ☐ Third party commercial database. Kindly provide the name of the database: _____
- ☐ Open source searching
- ☐ Others, specify: _____
- ☐ Do not have screening process for PEPs.

2. What actions are taken for PEP (describe based on MTPP): _____

On-going Monitoring of Customers. Accounts and Transactions

1. What is your AML/CTPF transaction monitoring systems?

- ☐ Manual monitoring tool (i.e., excel based monitoring)
- ☐ Electronic monitoring tool
- ☐ Mixed (electronic and manual)

1.1 If electronic, it is:

- ☐ Internally developed
- ☐ Third party subscription. name of the system and the developer: _____
- ☐ Others (Specify) _____

1.2 If manual, what are the reports used for transaction monitoring?

2. Who investigates alerts generated by the manual or electronic monitoring system?

- ☐ Compliance office
☐ Responsible units (i.e., branches, operations unit)
☐ Others (Specify) _____

3. Who approves disposition/decision of alerts?

- ☐ Compliance office
☐ Responsible units (i.e., branches, operations unit)
☐ Others (Specify) _____

4. What are the enhanced monitoring procedures for high risk customers?

5. Do you have transaction threshold that would trigger conduct of enhanced due diligence (EDD)?

- ☐ Yes ☐ No

6. If yes, kindly indicate the threshold/limit:

Transactions	Threshold for individual clients	Threshold for corporate clients
1. Cash deposit		
2. Cash withdrawal		
4. ATM withdrawal		
5. Incoming wire transfer		
6. Outgoing wire transfer		
7. Foreign exchange		
9. Others, specify		

7. What are the instances that customer accounts were prohibited/closed? Mark all applicable items and provide number of prohibited and closed accounts.

Instances	No. of Prohibited Accounts	No. of Closed Accounts
<input type="checkbox"/> Subject of suspicious transaction report (STR)		
<input type="checkbox"/> Inclusion in the Negative Watchlist		
<input type="checkbox"/> Inclusion in sanctions list		
<input type="checkbox"/> Failure of CDD/EDD		
<input type="checkbox"/> Others, specify: _____		

8. What is your institution's policy for updating clients' information? Please indicate the number of years for updating.

- ☐ Low _____
☐ Normal _____
☐ High _____
☐ Based on triggers : indicate scenarios: _____

8.1 Does the policy on updating of client information include updating of BO information?

- ☐ Yes ☐ No

8.2 Does a change in BO structure trigger an update on the client's information and risk profile?

___ Yes, please describe briefly.

___ No. Is there a plan to adopt the measure? Please explain briefly and provide timeline

9. Identify the top five (5) nature of industry/business of your existing legal persons/juridical clients (corporations and/or partnerships). _____
10. Indicate number of BOs from high-risk international jurisdictions and number of juridical accounts held/owned by said BO in the institution. Indicate number or N/A if None.

No. of BOs from high risk foreign jurisdictions	No. of Juridical accounts held/owned by BOs in high risk jurisdictions

Sanctions Screening and Compliance with FO and TFS

1. When is sanctions screening³ conducted? Mark all applicable Items.
 - ☐ During establishment of relationship or opening of accounts
 - ☐ Prior to first transaction
 - ☐ Every transaction
 - ☐ Periodically over the course of the relationship
 - ☐ Whenever there are new designations or updates in the sanctions list
 - ☐ Whenever there are updates to the client's information
 - ☐ Others (Specify) _____
2. Who are subjected to **sanctions screening**? Mark all applicable Items.
 - ☐ Customers
 - ☐ BOs
 - ☐ Authorized signatories
 - ☐ Trustee/Trustor
 - ☐ Intermediary Institutions
 - ☐ Remitter
 - ☐ Beneficiaries
 - ☐ Non-accountholders/transactors (e.g., payees of check, foreign exchange remittances, etc.)
 - ☐ Others (Specify) _____
3. Who are subjected to **periodic scrubbing**⁴? Mark all applicable Items.
 - ☐ Customers
 - ☐ BOs
 - ☐ Authorized signatories
 - ☐ Trustee/Trustor
 - ☐ Intermediary Institutions
 - ☐ Remitter
 - ☐ Beneficiaries
 - ☐ Non-accountholders/transactors (e.g., payees of check, foreign exchange remittances, etc.)
 - ☐ Others (Specify) _____

³ Sanctions screening is a control used in the detection, prevention and disruption of financial crime and, in particular, sanctions risk. It is the comparison of one string of text against another to detect similarities which would suggest a possible match. It compares data sourced from an FI's operations, such as customer and transactional records, against lists of names and other indicators of sanctioned parties or locations. (Wolfsberg Guidance on Sanctions Screening).

⁴ Scrubbing involves the checking of designated individuals and/or entities against the institution's customer database, i.e., whenever there are updates to the United Nation Security Council sanctions list and/or Anti-Terrorism Council designated list, and/or periodic/specific timing as indicated in the institution's policy such as monthly, quarterly, etc.

4. Are there transactions that are **not** subjected to sanctions screening?

5. How does your institution conduct sanctions screening?

- ☐ Owned/in-house developed database
- ☐ Third party commercial database. Kindly provide the name of the Third party provider: _____
- ☐ Open source searching
- ☐ Others, specify: _____
- ☐ We do not have screening process for persons/entities in Sanctions List.

6. How does your institution maintain a sanctions database?

- ☐ Manual
- ☐ Electronic
- ☐ Mixed

6.1 If electronic, is it:

- ☐ Internally developed
- ☐ Purchased from a vendor: (system name) _____

7. How are the results of screening documented for audit trail? _____

8. How often do you update your sanctions list? Mark all applicable items.

- ☐ Daily
- ☐ Whenever there are updates in the sanctions list, etc.
- ☐ Others (Specify) _____

9. Who is responsible for updating the sanctions list database?

- ☐ Compliance office
- ☐ Branch
- ☐ Others (Specify) _____

10. Who is responsible for handling/implementing FOs?

- ☐ Compliance office
- ☐ Branch
- ☐ Others (Specify) _____

Suspicious Transaction Reporting

1. How are possible suspicious transactions identified? Mark all applicable.

- ☐ System generated alerts
- ☐ Manually identified red flags including branch referrals
- ☐ Adverse media reports scanning
- ☐ Others (Specify) _____

2. Who is responsible for identifying, analyzing, investigating, and reporting suspicious transactions?

	Identification	Investigation/Analysis	Reporting to AMLC
Compliance Office	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Branch/business Unit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Others (Specify)	_____	_____	_____

3. Who has the final decision on whether to file an STR to the AMLC?

- ☐ AML/CTPF Oversight Committee
- ☐ Compliance Officer
- ☐ Others, specify: _____

4. Do you have policies on tipping-off measures?
☐ Yes ☐ No

4.1. If yes, briefly describe:

5. Indicate total number of manually identified red flags. _____
6. Indicate number of STRs filed based on manually identified red flags.

7. Indicate total number of alerts generated from the system. _____
8. Indicate number of STRs filed based on system generated alerts. _____
9. For STRs reported under Suspicious Indicator 6, kindly provide at least five (5) common suspicious activities reported:
1. _____
 2. _____
 3. _____
 4. _____
 5. _____

10. Indicate number of STRs filed involving BOs including the amount involved. Indicate number/amount or N/A if None.

No. of STRs	Amount Involved

11. Identify top 5 basis for filing STRs involving BOs.

Record-keeping

1. Who is responsible for maintaining all records of customer and transactions?
 - ☐ Branch
 - ☐ Separate unit
 - ☐ Others (Specify) _____
2. What is your institution's retrieval process?
 - ☐ Manual retrieval of printed documents
 - ☐ Access in the centralized database by authorized personnel
 - ☐ Others (Specify) _____

Continuing Education and Training Program (CETP)

1. Is the AML/CTPF training mandatory for all employees?
 - ☐ Yes
 - ☐ No

- 1.1 If no, who are required to undergo AML/CTPF trainings?
- ☐ Board and Senior Management
 - ☐ 1st line of defense
 - ☐ 2nd line of defense
 - ☐ 3rd line of defense
 - ☐ Others (Specify) _____
2. When do you conduct AML/CTPF training for new hires?
- ☐ Prior to deployment to job function
 - ☐ Within 3 months from employment
 - ☐ Within 6 months from employment
 - ☐ Others (Specify) _____
3. How often do you conduct refresher AML/CTPF trainings?
- ☐ Annually
 - ☐ Every 2 years
 - ☐ Whenever there are new regulations
 - ☐ Others (Specify) _____
4. Who are required to take annual refresher AML/CTPF trainings? Mark all applicable items.
- ☐ Board and Senior Management
 - ☐ 1st Line of Defense
 - ☐ 2nd Line of Defense
 - ☐ 3rd Line of Defense
 - ☐ All Employees

Know-Your-Employees

1. What are your policies and procedures to ensure the integrity of your prospective and existing employees? Kindly mark all applicable items.

For prospective employees:

- ☐ Background checking
- ☐ Criminals record checking
- ☐ Certificate of no pending cases, administrative cases etc. (e.g., certificate from PNP and NBI)
- ☐ Checking against BSP Watchlist File
- ☐ Others, specify: _____

For existing employees:

- ☐ Code of conduct and code of ethics
- ☐ Employee surveillance (e.g., Lifestyle check, monitoring of social media activities)
- ☐ Rotation of duties
- ☐ Whistle blower policy
- ☐ Others, specify: _____

2. Are AML/CTPF issues/findings on units considered in the Key Result Area of the responsible personnel?
- ☐ Yes. If yes, provide information (example: 5% demerit system): _____
 - ☐ No
3. What are the sanctions imposed on BSFI personnel for non-compliance with AML/CTPF requirements/obligations? Kindly mark all applicable items.
- ☐ Warning
 - ☐ Reprimand
 - ☐ Monetary Penalty
 - ☐ Suspension
 - ☐ Termination
 - ☐ Legal action
 - ☐ Others, specify: _____

C. Self-Assessment System

Compliance Function

1. The Compliance Office/Unit directly reports to the -
☐ BOD
☐ Board-level committee
☐ Management-level committee
☐ Others (Specify) _____
2. Who conducts compliance testing? Mark all applicable items.
☐ Compliance officer/s
☐ Branch compliance officer/s
☐ Others (Specify) _____
3. How often do you conduct AML/CTPF compliance testing?

4. What are the factors used in assessing risk of business units in compliance testing program? Mark all applicable items.

<input type="checkbox"/> ML/TF/PF/sanctions risks and controls associated with the units	<input type="checkbox"/> Previous AML/CTPF rating
<input type="checkbox"/> Emerging risks	<input type="checkbox"/> Fraud
<input type="checkbox"/> Negative news	<input type="checkbox"/> Others (Specify) _____
5. How do you monitor/track compliance issues?
☐ None. We do not track/monitor exceptions/corrections.
☐ Manual (i.e., excel based monitoring)
☐ Electronic
☐ Mixed
6. What is the turn-around time to submit compliance testing results to the Board/designated BOD Committee? _____.

Internal Audit

1. The internal audit directly reports to the -
☐ BOD
☐ Board-level audit committee
☐ Management-level committee
☐ Others (Specify) _____
2. What are the types of AML/CTPF audit conducted? Mark all applicable items.
☐ Regular audit wherein units are subjected to risk-based audit
☐ Special audit due to fraud, etc.
☐ Others (Specify) _____
3. Do you have a monitoring/tracking system for audit findings?
☐ None. We do not track/monitor exceptions/corrections.
☐ Manual (i.e., excel based monitoring)
☐ Electronic
☐ Mixed

4. What is the turn-around time to submit audit reports to the Audit Committee?
- _____

D. Risk Indicators

a. *Product risk and Clients' Profile*

On wire transfers/remittances

1. Does your institution offer wire transfer/remittances operations?

☐ Yes ☐ No

- 1.1 If yes, who are the top beneficiaries/remitters of funds in your institution?
Rank the following remitters (1 being the top remitter):

Beneficiaries of inward remittances	Remitters of outward remittances
____ Overseas Filipino Workers	____ Overseas Filipino Workers
____ Individuals engaged in trade/ business/ investment activities	____ Individuals engaged in trade/ business/ investment activities
____ Non-resident aliens	____ Non-resident aliens
____ Juridical entities	____ Juridical entities
____ Others, specify: _____	____ Others, specify: _____

- 1.2 Identify the top five (5) nature of business of clients using wire transfers.
- _____

- 1.3 Identify the top five (5) source and destination countries in wire transfer transactions.

Source	Destination
1. _____	1. _____
2. _____	2. _____
3. _____	3. _____
4. _____	4. _____
5. _____	5. _____

- 1.4. Identify the top five (5) source and destination regions in domestic wire transfer transactions.

Source	Destination
1. _____	1. _____
2. _____	2. _____
3. _____	3. _____
4. _____	4. _____
5. _____	5. _____

On trade finance

1. Does your institution offer trade finance products (such as letter of credit (LC), documentary collection non-LC, trust receipt, intercompany open account, among others)?

☐ Yes ☐ No

- 1.1. If yes, what tools are employed to detect trade-based money laundering/terrorist financing/proliferation financing (TBML/TF/PF)?

☐ Manual monitoring tool

☐ Electronic System Monitoring Tool (indicate name of the system):

☐ Mixed (electronic and manual)

- 1.2. Have you encountered TBML/TF/PF cases during the covered period?
☐ Yes ☐ No

1.2.1 If yes, indicate the actions taken and number of cases/incidents.

Action Taken	No. of incidents
Filing of suspicious transactions	
Closure of accounts/ relationships	
Inclusion in the negative list	
Denial of transaction	
Others. specify: _____	
Add rows as necessary	

- 1.3. Identify the top five (5) nature of work or business of clients availing trade finance products.

- 1.4. Identify the top five (5) counterparty jurisdictions involved in the trade finance transactions.

On correspondent banking relationship (CBR)

1. Does your institution offer CBR?
☐ Yes ☐ No
- 1.1 If yes, what are the types of correspondent banking relationships the institution maintains?
☐ Nested accounts
☐ Relationship management application
☐ Nostro
☐ Vostro
☐ Bank Counterparties with Credit Lines
☐ Payable-through accounts
☐ Others. specify: _____
- 1.2 As a correspondent bank, what is your institution's policies and procedures in handling any flagged unusual activity? Mark all applicable items:
☐ Conduct further review of the transaction
☐ Request transaction information from the Respondent Bank
☐ Others, please specify _____
- 1.3 What is the institution's further action if the Respondent Bank is unresponsive to the request for information? Mark all applicable:
☐ File an STR
☐ Reassessment of the CBR
☐ Others, please specify: _____
- 1.4 What is the institution's turn-around time in providing requested information to the Correspondent Bank? _____

Private Banking/Wealth Management Operations

1. Does your institution offers private banking/wealth management operations?
☐ Yes ☐ No
- 1.1 If yes, what is the institution's standard due diligence being applied to this type of clients? _____

- 1.2 Who approves the acceptance of customers of private banking, wealth management and similar activities? _____

Numbered Accounts

1. Does your institution accept and maintain numbered accounts?
☐ Yes ☐ No
- 1.1. If yes, does your institution has existing policies and procedures in applying EDD and identifying existence of beneficial owners of such accounts?
☐ Yes ☐ No

b. On country risk:

1. What actions are applied to mitigate country risk? Choose all applicable items.

- | | |
|--|---|
| <input type="checkbox"/> High risk countries are prohibited to transact with the institution (specify prohibited countries): _____ | <input type="checkbox"/> Stringent transaction due diligence applied (e.g., request for supporting documents for the transaction, source of fund among others) (briefly describe BSFI policy) |
| <input type="checkbox"/> Limit or restrict transactions with identified high risk countries (specify limits or restrictions imposed) | <input type="checkbox"/> No specific mitigating controls |
| <input type="checkbox"/> All clients coming from/operating in these countries are tagged as high risk, hence EDD shall apply | <input type="checkbox"/> Others, specify: _____ |

Additional information On Virtual Currency Transactions (For VASPs):

1. Does your institution offer virtual currency (VC) operations?
☐ Yes ☐ No
- 1.1. Identify the top five (5) nature of business of clients availing VC transactions. _____
- 1.2. Identify the top five (5) source and destination countries in VC transactions and inward/outward remittances facilitated through VC.

VC transactions		Inward/outward remittances facilitated through VC	
Source	Destination	Source	Destination
1.	1.	1.	1.
2.	2.	2.	2.
3.	3.	3.	3.
4.	4.	4.	4.
5.	5.	5.	5.

- 1.3. Identify the top five (5) nature of business of clients using remittance facilitated through VC. _____

Additional question for Stand-alone Credit Card Issuers

1. Does your institution offer credit card products?
☐ Yes ☐ No

1. Identify the top five (5) nature of work/business of clients availing credit cards.

2. Identify the top five (5) usage location (countries and regions e.g., national capital region) availing credit card products.

Countries	Regions
1.	1.
2.	2.
3.	3.
4.	4.
5.	5.

Annex A-2

Schedule 1

Name of BSFI:
For the reference period:
Products and Services

PRODUCTS AND SERVICES (BANKS)		Level of Inherent Risk of the Product/Service (Low, Medium, High)	Individual						Juridical					
			Low		Medium		High		Low		Medium		High	
			No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance
1	Deposit													
2	Loans (except Credit Cards and interbank loans)													
3	Credit Cards													
4	Trust Products/Services and Third Party Custodianship (Total of 4a-4e)													
	4a. Trust													
	4b. Other Fiduciary Servies (OFS)													
	4c. Agency													
	4d. Advisory/Consultancy													
	4e. Special Purpose Trust													
5	Private Banking/Wealth Management													
6	Electronic Money													
7	Others or Products and Services ^{3/} (Specify)													

^{4/} Products and services other than Items provided in this worksheet.

PRODUCTS AND SERVICES (BANKS)		Level of Inherent Risk of the Product/Service (Low, Medium, High)	Number of Customers						Number of Transactions		Transaction Value (In Absolute PHP)	
			Individual			Juridical			Inward	Outward	Inward	Outward
			Low	Medium	High	Low	Medium	High				
8	Trade Finance											

PRODUCTS AND SERVICES (BANKS)		Level of Inherent Risk of the Product/Service (Low, Medium, High)	Number of Transactions		Transaction Value (In Absolute PHP)		Number of Existing remittance agents, remittance tie-ups and remittance centers (exclusive of accounts terminated/restricted)	Number of remittance agents, remittance tie-ups and remittance centers that were opened	Number of remittance agents, remittance tie-ups and remittance centers that were terminated/restricted
			Inward	Outward	Inward	Outward			
9	Wire Transfers (Total of 9a-9c)								
	9a. International Wire Transfers								
	i. Trade ^{2/}								
	ii. Non-trade ^{3/} (e.g., open accounts, OFW remittances, international payments, etc.)								
	9b. Domestic Wire Transfers								
	9c. Remittance Agents/Tie Up/Remittance Centers								

^{2/}Trade transactions refer to transactions involving export and/or import of merchandise/goods

^{3/}Non-trade transactions refer to all other foreign exchange transactions not included in the definition of trade transactions. These shall include foreign loans, foreign investments, and other investments by both residents and non-residents

PRODUCTS AND SERVICES (BANKS)		Level of Inherent Risk of the Product/Service (Low, Medium, High)	Number of Transactions		Transaction Value (In Absolute PHP)	
			Bought	Sold	Bought	Sold
10	Treasury Products (Total of 10a-10c)					
	10a. Purchase and sale of securities ^{4/}					
	i. Equity Securities					
	ii. Debt Securities					
	ii. Derivatives					
	10b. Foreign currency exchange transactions (report per currency)					
	i. Trade					
	ii. Non-trade					
	10c. Others (Specify)					

^{4/}Excludes proprietary transactions

PRODUCTS AND SERVICES (BANKS)		No. of Existing Correspondent Banking Relationship ^{5/} Per Country (at of end of reference year)	No. of Correspondent Banking Relationship Opened during the reference period	No. of Correspondent Banking Relationship Closed/ Terminated during the reference period	Reason for Closed/ Terminated Correspondent Banking Relationship
11	Correspondent Banking Relationships				
	Democratic People's Republic of Korea				
	Iran				
	Add rows for top 10 countries (based on no. of relationships)				
	Other countries (in total)				

^{5/}As defined under Section 923 and Appendix 140 of the MORB

Name of BSFI:
For the reference period:

Products and Services

PRODUCTS AND SERVICES (TRUST CORPORATION)		Level of Inherent Risk of the Product/Service (Low, Medium, High)	Individual						Juridical					
			Low		Medium		High		Low		Medium		High	
			No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance
1	Trust													
	a. UITF													
	b. Institutional Trust Accounts													
	c. Individual Trust Accounts													
2	Other Fiduciary Services (OFS)													
	a. UITF-OFS													
	b. Court Trusts													
	c. Legislated/Quasi-Judicial													
	d. Property Administratorship													
	e. Corporate Fiduciary Accounts													
	f. Escrow													
	g. Custodianship													
	h. Safekeeping													
	i. Life Insurance Trust													
	j. PERA Administratorship													
	k. Others, please specify													
3	Agency													
	a. Institutional Agency Accounts													
	b. Individual Accounts													
4	Advisory/Consultancy													
5	Special Purpose Trust													
7	Others or Products and Services ^{1/} (Specify)													

^{1/} Products and services other than Items provided in this worksheet.

Name of BSFI:
For the reference period:

Products and Services

PRODUCTS AND SERVICES (NSSLA)		Level of Inherent Risk of the Product/Service (Low, Medium, High)	Individual						Juridical					
			Low		Medium		High		Low		Medium		High	
			No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance
1	Deposit													
2	Loans													
7	Others or Products and Services ^{1/} (Specify)													

^{1/} Products and services other than Items provided in this worksheet.

Name of BSFI:
For the reference period:

Products and Services

PRODUCTS AND SERVICES (VASP)		Level of Inherent Risk of the Product/Service (Low, Medium, High)	Individual						Juridical					
			Low		Medium		High		Low		Medium		High	
			No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance
1	Virtual Currency (VC)/Virtual Asset (VA) Wallet													
2	Others or Products and Services ^{1/} (Specify)													

^{1/} Products and services other than Items provided in this worksheet.

Name of BSFI:
For the reference period:

Products and Services

PRODUCTS AND SERVICES (EMI)		Level of Inherent Risk of the Product/Service (Low, Medium, High)	Individual						Juridical					
			Low		Medium		High		Low		Medium		High	
			No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance	No. of Customer	Account Balance
1	Electronic Money/Wallet													
2	Others or Products and Services ^{1/} (Specify)													

^{1/} Products and services other than Items provided in this worksheet.

Schedule 2

Name of BSFI:

For the reference period:

Customer profile and Geographic Location

I. Customer Category/Type

Customer Category/Type (Kindly indicate type of corporate or individual client)		Total Number of Customers						Total Value of ALL Transactions (Debit + Credit Transactions)	Common Products/Services Availed
		Individual			Juridical				
		Low	Medium	High	Low	Medium	High		
	Total Number of Customers 1/								
	1 MSB								
	2 NGO								
	3 PEPs								
	a. Foreign PEPs								
	b. Domestic PEPs								
	4 Non-resident alien								
	5 Residents from/operating in identified high risk jurisdictions								
	6 Bearer Share entities								
	7 Shell/Shelf Companies								
	8 NGOs/NPOs/Charities/Foundations								
	9 Cash-intensive businesses								
	10 Virtual Asset Service Provider								
	11 Luxury Cars, Boats and Plane Dealers								
	12 High Networth Individuals (as defined in BSFI's policy)								
	13 Casino								
	14 Offshore Gaming Operator (OGO) 2/								
	15 Precious metal stones Dealers/Jewellers								
	16 Real Estate Developer, Broker, Agent								
	17 Lawyers 3/								
	18 Accountants 3/								
	19 Company Service Providers 4/								

1/ The total number of customers must be equivalent to BSFI's customer information files (CIF)

2/ Including their Service Providers, Supervised, Accredited or Regulated by the PAGCOR or any AGA

3/ Persons as defined under Section 2.c of the AMLC Regulatory Issuance No. (ARI) 03, Series of 2021

4/ Businesses as defined under Section 2.b of ARI No. 03, Series of 2021

II. Domestic Regional Distribution

Region		Risk Profile of the Region (Low, Moderate, Above Average, High)	Total Number of Customers per Region		Usual Products/Services Availed/Type of Transactions	Total Value of the Products/Services Availed
			Individual	Juridical		
1	Region 1 (Ilocos Region)					
2	Region 2 (Cagayan Valley)					
3	Region 3 (Central Luzon)					
4	Region 4A (CALABARZON)					
5	Region 4B (MIMAROPA)					
6	Region 5 (Bicol Region)					
7	Region 6 (Western Visayas)					
8	Region 7 (Central Visayas)					
9	Region 8 (Eastern Visayas)					
10	Region 9 (Zamboanga Peninsula)					
11	Region 10 (Northern Mindanao)					
12	Region 11 (Davao Region)					
13	Region 12 (SOCCSKSARGEN)					
14	Region 13 (Caraga Region)					
15	NCR (National Capital Region)					
16	ARMM (Autonomous Region in Muslim Mindanao)					
17	CAR (Cordillera Administrative Region)					

III. Clients from Jurisdictions Considered by the BSFI as High Risk*

High risk jurisdiction/Country		Total Number of Customers per Jurisdiction		Products/Services Availed/Type of Transactions	Total Value of Products/Services Availed	Total Volume of Products/Services Availed
		Individual	Juridical			
1	Democratic People's Republic of Korea					
2	Iran					
3	Myanmar					
4	(Please add rows for other countries based on BSFI policy)					

*Based on BSFI's IRA, Financial Action Task Force's List of Jurisdictions under Monitoring, The Philippines' National Risk Assessment, and BSFI's Sectoral Risk Assessment

IV. Application of Reduced Due Diligence

Products/Services	Type of Customers*	Total Number of Customers
1	Basic Deposit Account (BDA)	
2	Restricted Deposit Account	
3	Others please specify:	

*Indicate general category/description of customers

Schedule 3

Name of BSFI:

For the reference period:

Delivery Channels

I. Alternative Delivery Channels used to deliver products and services to customers					
Alternative Delivery Channels	Percentage of Number of Users as to Total Number of Customers	Value of Transactions coursed through these channels (In Absolute PHP)		Percentage of value of transactions coursed through the channel to total value of all transactions	Level of Inherent Risk of the Product/Service (Low, Moderate, Above Average, High)
		Individual	Juridical		
a. Internet Banking					
b. Mobile Application					
c. Phone Banking					
d. Point of Sale (POS)					
e. Automated Telling Machine					
f. Cash Deposit/Acceptance Machine					
g. Check Deposit/Acceptance Machine					
h. Cash Agents					
i. Others (Specify)					

II. Customer Onboarding Channels				
Delivery Channels for customer onboarding	Total Number of Customers		Percentage of Customers Onboarded (Individual + Juridical) to Total Number of Customers	Products/ Services Aailed
	Individual	Juridical		
a. Face-to-face (i.e., thru branch/branch personnel)				
b. Technology-aided/Digital platform				
<i>i. provide details</i>				
(add rows if necessary)				
c. Outsourcing arrangements				
<i>i. Cash Agents</i>				
<i>ii. Payroll Arrangements</i>				
<i>iii. Other arrangements</i>				
d. Third party reliance				
e. Others (Specify)				
<i>i. provide details</i>				
<i>i. provide details</i>				

Classification: GENERAL

Name of BSFI:
For the reference period:

Implementation of Targeted Financial Sanctions

UNSC Resolutions/ATC Designations	Date of Publication	Number of Name Matches ^{1/}	Potential Target Match							Target Match					No. of STRs reported to AMLC	Other Actions Taken (Kindly identify)
			Total No. of Potential Target Matches	No. of Confirmed Matches (as confirmed by the AMLC)	No. of False Matches (as confirmed by AMLC)	No. of Accounts Frozen	Amount Frozen	Date of Freezing	Date Reported to AMLC	No. of Target Matches <i>(based on evaluation of the BSFI)</i> ^{2/}	No. of Accounts Frozen	Amount Frozen	Date of Freezing	Date of e-Return submitted to AMLC		
UNSC 1267/1989 (Al Qaeda)																
UNSC 1988 (Taliban)																
UNSC 2253 (ISIL Daesh)																
UNSC 1718 (DPRK)																
UNSC 2231 (Iran)																
ATC Designations: add row to Indicate AMLC TF Resolution																
Add rows when necessary																

1/Name match - refers to an individual or entity whose name matches with a name in the UNSC Consolidated List and any list of designations made by the Anti-Terrorism Council (ATC) under Section 25 of the Anti-Terrorism Act (ATA)

2/ Does not include those initially reported as potential target match and eventually confirmed positive by the AMLCS

Schedule 5

Name of BSFI:
For the reference period:

Training

No.	Title of Training	Training Host (Internal or External)	Topics (Indicate topics covered, refer to risk sample risk areas below)*	Training Hours	No. of Personnel Participants Attended									Cite impact on compliance, if any
					Board and Senior Management	% as to total no. of Board and SM	1st Line of Defence	% as to total no. of 1st line of defence	2nd Line of Defence	% as to total no. of 2nd line of defence	3rd Line of Defence	% as to total no. of 3rd line of defence	Other personnel	
		(put dropdown)												(Example:- - Enhanced AML/CFT Awareness resulting to improved implementation of the MTPP and deterrence from being used as a conduit for ML/TF activities - Strict implementation of AML policies and procedures and monitoring of the business units' compliance with the AML regulatory requirements)

*May include CDD, suspicious transaction reporting, red flag indicators/hypologies to predicate offenses rated as high (such as drugs, fraud, TF, etc.), UBO identification and verification, targeted financial sanctions on TF and PF, VASPs, emerging risks, etc.

Name of BSP Supervised Financial Institution
ANTI-MONEY LAUNDERING/COUNTERING THE TERRORISM AND PROLIFERATION FINANCING (AML/CTPF) REPORTING PACKAGE
 As of (Year-end)
CONTROL PROOF LIST
BANKS

SCHEDULE 1							
Products and Services	Total Number of Customers	Total Account Balance	Total Volume of Transactions	Total Value of Transactions	No. of Existing Correspondent Banking Relationship	No. of Correspondent Banking Relationship Opened during the reference period	No. of Correspondent Banking Relationship Closed/ Terminated during the reference period
1. Deposit							
2. Loans (except Credit Cards and Interbank loans)							
3. Credit Cards							
4. Trust Products/Services and Third Party Custodianship							
5. Private Banking/Wealth Management							
6. Electronic Money							
7. Trade Finance							
8. Wire Transfers							
9. Treasury Products							
10. Correspondent Banking Relationships							
11. Others or Products and Services (add rows as necessary)							

SCHEDULE 2			
Customer Profile and Geographic Location	Total Number	Total Volume of Transactions	Total Value of Transactions
I. Total Number of Customers			
II. Total Number of Customers from Items 1 to 19			
III. Total Number of Customers from Regions 1-13, NCR, ARMM and CAR			
IV. Total Number of Customers from High Risk Jurisdiction/Country			
V. Total Number of Customers subjected to Reduced Due Diligence			

SCHEDULE 3			
Delivery Channels	Total Number of Customers	Total Value of Transactions Coursed Through the Channel	Percentage of Value of Transactions Coursed Through the Channel to Total Value of All Transactions
I. Alternative Delivery Channels used to deliver products and services to customers			
II. Customer Onboarding Channels			

SCHEDULE 4							
UNSC Resolutions/ATC Designations	Total Number of Name Matches	Potential Target Match		Total Number of Target Matches*	Total Number of Accounts Frozen**	Total Amount Frozen**	No. of STRs filed to the AMLC
		Total Number of Potential Target Matches	Total Number of Confirmed Matches (as confirmed by the AMLC)				
UNSC 1267/1989 (Al Qaeda)							
UNSC 1988 (Taliban)							
UNSC 2253 (ISIL Daesh)							
UNSC 1718 (DPRK)							
UNSC 2231 (Iran)							
ATC Designations: add row to Indicate AMLC TF Resolution							
Add rows when necessary							

*Does not include those initially reported as potential target match and eventually confirmed positive by the AMLCS
 **Relative to Columns E and F

SCHEDULE 5					
Total Number of Trainings Attended/Hosted	Number of personnel participants attended the trainings				
	Board and Senior Management	1st Line of Defence	2nd Line of Defence	3rd Line of Defence	Other personnel

I hereby certify that all matters set forth in this AML/CTPF Reporting Package, including the AML/CTPF questionnaire, are true and correct to the best of our knowledge and belief.

 Name and Signature of Authorized Signatory

 Date

SCHEDULE 1		
Products and Services	Total Number of Customers	Total Account Balance
1. Trust		
2. Other Fiduciary Services (OFS)		
3. Agency		
4. Advisory/Consultancy		
5. Special Purpose Trust		
6. Others or Products and Services (add rows as necessary)		

SCHEDULE 2			
Customer Profile and Geographic Location	Total Number	Total Volume of Transactions	Total Value of Transactions
I. Total Number of Customers			
II. Total Number of Customers from Items 1 to 19			
III. Total Number of Customers from Regions 1-13, NCR, ARMM and CAR			
IV. Total Number of Customers from High Risk Jurisdiction/Country			
V. Total Number of Customers subjected to Reduced Due Diligence			

SCHEDULE 3			
Delivery Channels	Total Number of Customers	Total Value of Transactions Coursed Through the Channel	Percentage of Value of Transactions Coursed Through the Channel to Total Value of All Transactions
I. Alternative Delivery Channels used to deliver products and services to customers			
II. Customer Onboarding Channels			

SCHEDULE 4							
UNSC Resolutions/ATC Designations	Total Number of Name Matches	Potential Target Match		Total Number of Target Matches*	Total Number of Accounts Frozen**	Total Amount Frozen**	No. of STRs filed to the AMLC
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UNSC 1267/1989 (Al Qaeda)							
UNSC 1988 (Taliban)							
UNSC 2253 (ISIL Daesh)							
UNSC 1718 (DPRK)							
UNSC 2231 (Iran)							
ATC Designations: add row to indicate AMLC TF Resolution							
Add rows when necessary							

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**Relative to Columns E and F

SCHEDULE 5					
Total Number of Trainings Attended/Hosted	Number of personnel participants attended the trainings				
	Board and Senior Management	1st Line of Defence	2nd Line of Defence	3rd Line of Defence	Other personnel

I hereby certify that all matters set forth in this AML/CTPF Reporting Package, including the AML/CTPF questionnaire, are true and correct to the best of our knowledge and belief.

Name and Signature of Authorized Signatory

Date _____

Name of BSP Supervised Financial Institution
ANTI-MONEY LAUNDERING/COUNTERING THE TERRORISM AND PROLIFERATION FINANCING (AML/CTPF) REPORTING PACKAGE
 As of (Year-end)
CONTROL PROOF LIST
NON-STOCK SAVINGS AND LOANS ASSOCIATIONS

SCHEDULE 1		
Products and Services	Total Number of Customers	Total Account Balance
1. Deposit		
2. Loans		
3. Others or Products and Services		

SCHEDULE 2			
Customer Profile and Geographic Location	Total Number	Total Volume of Transactions	Total Value of Transactions
I. Total Number of Customers			
II. Total Number of Customers from Items 1 to 19			
III. Total Number of Customers from Regions 1-13, NCR, ARMM and CAR			
IV. Total Number of Customers from High Risk Jurisdiction/Country			
V. Total Number of Customers subjected to Reduced Due Diligence			

SCHEDULE 3			
Delivery Channels	Total Number of Customers	Total Value of Transactions Coursed Through the Channel	Percentage of Value of Transactions Coursed Through the Channel to Total Value of All Transactions
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SCHEDULE 4							
UNSC Resolutions/ATC Designations	Total Number of Name Matches	Potential Target Match		Total Number of Target Matches*	Total Number of Accounts Frozen**	Total Amount Frozen**	No. of STRs filed to the AMLC
		Total Number of Potential Target Matches	Total Number of Confirmed Matches (as confirmed by the AMLC)				
UNSC 1267/1989 (Al Qaeda)							
UNSC 1988 (Taliban)							
UNSC 2253 (ISIL Daesh)							
UNSC 1718 (DPRK)							
UNSC 2231 (Iran)							
ATC Designations: add row to Indicate AMLC TF Resolution							
Add rows when necessary							

*Does not include those initially reported as potential target match and eventually confirmed positive by the AMLCS
 **Relative to Columns E and F

SCHEDULE 5					
Total Number of Trainings Attended/Hosted	Number of personnel participants attended the trainings				
	Board and Senior Management	1st Line of Defence	2nd Line of Defence	3rd Line of Defence	Other personnel

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 Name and Signature of Authorized Signatory Date

Name and Signature of Authorized Signatory _____ Date _____

SCHEDULE 1		
Products and Services	Total Number of Customers	Total Account Balance
1. Virtual Currency (VC)/Virtual Asset (VA) Wallet		
2. Others or Products and Services		

SCHEDULE 2			
Customer Profile and Geographic Location	Total Number	Total Volume of Transactions	Total Value of Transactions
I. Total Number of Customers			
II. Total Number of Customers from Items 1 to 19			
III. Total Number of Customers from Regions 1-13, NCR, ARMM and CAR			
IV. Total Number of Customers from High Risk Jurisdiction/Country			
V. Total Number of Customers subjected to Reduced Due Diligence			

SCHEDULE 3			
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SCHEDULE 4							
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UNSC 1988 (Taliban)							
UNSC 2253 (ISIL, Daesh)							
UNSC 1718 (DPRK)							
UNSC 2231 (Iran)							
ATC Designations: add row to indicate AMLC TF Resolution							
Add rows where necessary							

SCHEDULE 5					
Total Number of Trainings Attended/Hosted	Number of personnel participants attended the trainings				
	Board and Senior Management	1st Line of Defence	2nd Line of Defence	3rd Line of Defence	Other personnel

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Name and Signature of Authorized Signatory	Date
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Name of BSP Supervised Financial Institution
ANTI-MONEY LAUNDERING/COUNTERING THE TERRORISM AND PROLIFERATION FINANCING (AML/CTPF) REPORTING PACKAGE
 As of (Year-end)
CONTROL PROOF LIST
NON-BANK ELECTRONIC MONEY ISSUERS

SCHEDULE 1		
Products and Services	Total Number of Customers	Total Value of Transactions
I. Electronic Wallet		
2. Others or Products and Services		

SCHEDULE 2			
Customer Profile and Geographic Location	Total Number	Total Volume of Transactions	Total Value of Transactions
I. Total Number of Customers			
II. Total Number of Customers from Items 1 to 19			
III. Total Number of Customers from Regions 1-13, NCR, ARMM and CAR			
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SCHEDULE 3			
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SCHEDULE 4							
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UNSC 1988 (Taliban)							
UNSC 2253 (ISIL Daesh)							
UNSC 1718 (DPRK)							
UNSC 2231 (Iran)							
ATC Designations: add row to indicate AMLC TF Resolution							
Add rows when necessary							

*Does not include those initially reported as potential target match and eventually confirmed positive by the AMLCS
 **Relative to Columns E and F

SCHEDULE 5					
Total Number of Trainings Attended/Hosted	Number of personnel participants attended the trainings				
	Board and Senior Management	1st Line of Defence	2nd Line of Defence	3rd Line of Defence	Other personnel

I hereby certify that all matters set forth in this AML/CTPF Reporting Package, including the AML/CTPF questionnaire, are true and correct to the best of our knowledge and belief.

 Name and Signature of Authorized Signatory Date

Name of BSP Supervised Financial Institution
ANTI-MONEY LAUNDERING/COUNTERING THE TERRORISM AND PROLIFERATION FINANCING (AML/CTPF) REPORTING PACKAGE
As of (Year-end)
CONTROL PROOF LIST
STAND-ALONE CREDIT CARD ISSUERS

SCHEDULE 2			
Customer Profile and Geographic Location	Total Number	Total Volume of Transactions	Total Value of Transactions
I. Total Number of Customers			
II. Total Number of Customers from Items 1 to 19			
III. Total Number of Customers from Regions 1-13, NCR, ARMM and CAR			
IV. Total Number of Customers from High Risk Jurisdiction/Country			
V. Total Number of Customers subjected to Reduced Due Diligence			

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UNSC 1718 (DPRK)							
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ATC Designations: add row to Indicate AMLC TF Resolution							
Add rows when necessary							

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Name and Signature of Authorized Signatory

Date

**GUIDELINES ON THE ELECTRONIC SUBMISSION OF MONEY LAUNDERING (ML)/
TERRORIST FINANCING (TF)/PROLIFERATION FINANCING (PF)
RISK EVENT REPORT (RR)**

***(Appendix to item a (2) of Section 911/911Q of the Manual of Regulations for
Banks [MORB]/Manual of Regulations for Non-Bank Financial Institutions
[MORNBFi] on Reporting and Notification Requirements)***

1. The following BSP Supervised Financial Institutions (BSFIs) shall submit the required RR within the prescribed timeline:
 - a. Banks and quasi banks, including their subsidiaries and affiliates;
 - b. Stand-alone trust corporations;
 - c. Non-stock savings and loan associations;
 - d. Money service businesses (foreign exchange dealers, money changers, remittance and transfer companies);
 - e. Non-bank electronic money issuers;
 - f. Virtual asset service providers; and
 - g. Stand-alone credit card issuer.
2. All BSFIs shall use the prescribed RR *Data Entry Templates (DET)* [Annex B-1] which can be downloaded from https://www.bsp.gov.ph/ses/reporting_templates
3. The report shall be submitted **within twenty-four (24) hours from the date of knowledge of any ML/TF/PF risk event** to fsid-rr@bsp.gov.ph as the official e-mail address for RR submission using the following e-mail subject and filename of the report:

<RR>underscore<BSFI Acronym>underscore<Report Status>underscore<Date of Report in DD MMM YYYYYYYYMMDD>

For example: RR_ABCKB_Initial Report_05 Oct 2021

A follow-up report to the same incident, if any, shall be submitted using the following e-mail subject and filename of the report:

<RR>underscore<BSFI Acronym>underscore<Report Status>underscore<Date of Report in DD MMM YYYY>

For example: RR_ABCKB_Follow-up Report_31 Jan 2022

The DET shall be submitted using the prescribed file naming convention and file extension/format, as identified below:

File	File Name	File Extension/Format
RR Data Entry Template	RR_BSFI Acronym _Date of Report in DD MMM YYYY	.XLS

4. BSFIs that are unable to transmit via e-mail can submit the DET in any encrypted portable storage device (e.g., USB flash drive) through messengerial or postal services within the prescribed deadline addressed to:

The Director

Financial System Integrity Department
Bangko Sentral ng Pilipinas
5th Floor, Multi-Storey Building
BSP Complex, A. Mabini Street, Malate
1004 Manila

5. Report submission should continue to comply with the existing BSP reporting standards. It likewise follows that only files compliant with the prescribed form by the BSP for the report shall be accepted, and validated, subject to applicable penalties for reporting violations.
6. Queries regarding the ML/TF/PF Risk Event Report and its related regulations may be coursed through email to fsid@bsp.gov.ph.
7. The submission of the ML/TF/PF Risk Event Report shall not preclude the BSFIs from complying with the existing requirements on the (i) Reports on Crimes and Losses (RCL), operational and reputational risk events, including Event Driven Reporting and Notification (EDRN) under existing BSP regulations; and (ii) submission of Suspicious Transaction Report (STR) to the AMLC under Section 9(c) of the Anti-Money Laundering Act of 2001, as amended, and its Revised Implementing Rules and Regulations. In case that the ML/TF/PF risk event is also reportable under the EDRN, the BSFI may directly report the event to the appropriate supervising department handling the event-driven reports copy furnish the Financial System Integrity Department of the BSP via fsid-rr@bsp.gov.ph.

BSFI Name:
BSFI Code:
Branch Code (if Branch reporting):
Date of report:

Reference No.	Date		ML/TF/PF Risk Event	Brief Description of the Risk Event	Type of Customer/Client		Nature or Type of Transaction/Product	Amount of Transaction (Php)	Mode of Transaction/Delivery Channel Used	Initial Root Cause/s of the occurrence or possible occurrence of risk (e.g., issues on controls, system uprading, etc.)	Action/s Taken	Impact on the BSFI's operations (<i>in terms of financial/operational/reputational losses</i>)
	Date of Transaction (for transaction-driven report)	Date of Occurrence/Discovery (for internal fraud)			Individual	Juridical						
(User assigned)				Short Narrative	- indicate if accountholder, sender, beneficial owner, transactor, agent, or authorized representative of beneficial owner	indicate nature of business of customer (ex trading company, manning company, grocery, construction, foundation, service provider, etc.)	e.g. deposit, incoming remittance, outgoing remittance, e-money, CBR, etc.	Peso equivalent at the time of transaction	e.g. internet banking, OTC, mobile banking, etc.)	Short Narrative	(e.g. reported to AMLC, freeze the account, etc.)	(e.g. losses incurred, number of customers/accounts affected, number of complaints received, disrupted operations, etc.)