



# **ANTI-MONEY LAUNDERING COUNCIL**

## **SECRETARIAT**

### **AMLC LETTER NO. AMLET-17-002**

**To: All Covered Persons (except Casinos) under Republic Act (RA) No. 9160, as amended**

**Subject: AMLC Regulatory Issuance (ARI)(A) No. 4, series of 2017  
AMLC Registration and Reporting Guidelines**

On 15 November 2017, The Anti-Money Laundering Council (AMLC) issued AMLC Resolution No. 107, series of 2017, approving the AMLC Registration and Reporting Guidelines. On 8 December 2017, the Executive Director of the AMLC Secretariat issued **ARI (A) No. 4, series of 2017**, designating the ARRG as such.

Said ARI (A) No. 4 is the AMLC's comprehensive effort to provide the legal and policy framework for registration by covered persons into the AMLC's online system, and to ensure proper and timely compliance with reporting procedures.

ARI (A) No. 4 applies the new eighteen (18)-digit institution code adopted by the Bangko Sentral ng Pilipinas (BSP) for money service business (MSBs) and pawnshops. However, the eleven (11)-digit institution code continues to apply to other types of covered persons. ARI (A) No. 4 further reiterates the requirement on covered persons to submit complete, accurate, and timely STRs, and imposes additional requirements in the manner of submission to the AMLC. The submission of CTRs beyond 12:01 a.m. of the day following the fifth working day from occurrence of the transaction shall be considered as non-submission of CTRs, and may be subject to appropriate administrative sanction.

If the circumstances for filing an STR have no corresponding transaction, or if transaction monitoring system-generated alerts are only grounds for the covered person to conduct an internal analysis, investigation, and escalation, the suspicious nature of the circumstances shall be determined within sixty (60) calendar days.

Covered persons shall submit STRs within five (5) days from the occurrence, i.e. the date of determination of the suspicious nature of the transaction, which should not exceed ten (10) calendar days.

ARI (A) No. 4 requires establishment of an STR reporting chain, with reasonable time frames, which starts from the flagging of alerts, to analysis, investigation, and escalation, and ends with the final decision whether or not to file an STR. For the guidance, a comprehensive list of red flag indicators is attached as Annex D to the ARR. G.

Two (2) new facilities will now allow covered persons to upload Know-Your-Customer (KYC) documents for STRs and e-returns via the AMLC portal, if the reason for suspicion is based on the predicate crimes of kidnapping for ransom; drug trafficking; hijacking, destructive arson, and murder, including those perpetrated by terrorists against non-combatant persons and similar targets; and acts of terrorism and terrorism financing. The upload of KYC documents should be done before the STR is uploaded.

Covered persons are reminded that violations of ARI (A) No. 4 may subject erring covered persons to administrative sanctions, in accordance with the Rules on the Imposition of Administrative Sanctions under RA No. 9160, as amended.

The ARR. G shall take effect thirty (30) days after its publication or on 04 January 2018. The requirements for the Uploading of KYC Documents and the Uploading of Electronic Returns (E>Returns) for freeze orders issued by the AMLC shall take effect on the first banking day of January 2018.

Casinos shall be governed by separate guidelines on registration and reporting.

FOR THE AMLC:

(Signed)

**MEL GEORGIE B. RACELA**

Executive Director

14 December 2017