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Federal Office of Police fedpol
Crime Prevention & Directorate Staff
Money Laundering Reporting Office Switzerland

Schweizerische Eidgenossenschaft
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CH-3003 Bern
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To the financial intermediaries

Bern, April 2021

Newsletter goAML

Dear Sir or Madam,

In 2020, we sent you two newsletters with important points related to the use of goAML.

From our point of view, these newsletters have proven successful and we will therefore continue this practice. Thus, in 2021 you will receive further newsletters with current topics. These are explanations of recurring questions or errors as well as clarifications of publications that have already been made (e.g. manuals).

General information about goAML
The goAML software is used in over 60 countries and is a product of the UnoDC (United Nations Office on Drugs and Crime), a division of the UN in Vienna. The UnoDC is striving to continuously develop the goAML software and has assured that goAML will be in operation for at least five more years. This gives you as well as us a great planning security.

In the areas of crypto currencies, entity-to-entity relations and PEP topics, major improvements are pending. These are expected to be implemented in version goAML 5.0 and will have an impact on financial intermediaries because the improvements will also require changes to the so-called XSD schema (the framework of goAML). In order to give you enough time to make the necessary adjustments to your own systems and also to test them, it will be possible during a transitional period to report using both the currently valid schema and the goAML 5.0 schema. MROS aims to keep adaptations to be implemented by the financial intermediaries as low as possible and not to impose unnecessary or costly solutions. The UnoDC has announced goAML 5.0 for the second half of 2021. As soon as MROS knows more, information will be provided via newsletter.

Reporting via goAML - what to consider:

- **End of the transitional period (31ˢᵗ March 2021)**

  On July 21, 2020, MROS informed goAML users about changes in practice in connection with the electronic transmission of reports (STR/SAR) via goAML. At the same time, possible temporary solutions for the electronic transmission of SARs (limited until 31ˢᵗ March 2021) were communicated to the financial intermediaries. These temporary solutions were meant to allow the financial intermediaries to adapt their internal processes and systems accordingly.

  As of April 1, 2021, the following principle applies: only suspicious transactions (max. 100 transactions) must be reported. The details can be found on our website in the document [Adjustment to the practice of reporting via goAML valid from 01.04.2021](#).

  Financial intermediaries who have started the technical implementation, but are running out of time with regard to this deadline, are hereby requested to contact MROS (via MessageBoard), so that a **binding** deadline for completion can be agreed upon bilaterally.

  All reported business relationships should be mentioned If more than one business relationship is reported in a report (SAR or STR), a list of the individual contractual partners including the customer client number should be entered in the 'Reason for Suspicion' field. Text (example): "We hereby report the following five business relations: (list)". In the case of extensive reports, reference can also be made to an attachment with an overview of the reported business relations. Please ensure that it is evident why the individual business relations are being reported on the basis of the reporting text.

- **All reported accounts must be recorded**
  When triage the incoming reports, MROS regularly notices that the accounts reported in goAML do not match the accounts mentioned in the attachments. Often, only a few accounts are recorded in goAML, while the attachments indicate that the reported business relation includes numerous other accounts and sub-accounts. We would like to reiterate that an account is only considered reported within the meaning of Art. 9 AMLA or Art. 305ᵗᵉʳ para. 2 PC if it is actually recorded in goAML. Accounts that are not the subject of a suspicious transaction can be reported via the "Multiparty dummy transaction" function or via an additional AIF report. MROS reserves the right to reject incomplete reports within the meaning of Art. 4 para. 1 MLA and to insist on the subsequent recording of the additional accounts.

- **Presentation and documentation of suspicious circumstances**
  Suspicious circumstances that give rise to a report (e.g. an order for production of documents from a public prosecutor's office, a newspaper article, contradictory information in the KYC documentation, etc.) must - as a minimum content of a report - be set out in the facts of the report and documented upon submission (cf. Art. 3 para. 1 let. h MLA as well as "Documentation requirements for reports", [MROS Annual Report 2018](#), para. 4.1, p. 38). It is important that the financial intermediary states, for example, the reference to the original disclosure and/or seizure order, that it is mandatory to attach a copy of the order to the report, that it selects the indicator "Information from prosecution authorities" and thus enables MROS to carry out its analysis (cf. "Disclosure orders and MROS status", [MROS Annual Report 2017](#), para. 4.1, p. 56 as well as [the explanatory notes on the partial revision of the MROS Ordinance of 27 November 2019, p. 14 note 37](#) (not available in English).

- **Tools for the preparation of manual reports**
  The financial intermediaries who create the reports manually in the web portal must reacquaint themselves with the system and the specifications for each report. In addition to the manual, we have therefore clearly summarized the most important topics on three pages. This is intended to support manual entry and avoid technical rejections. We ask all manually reporting financial intermediaries to work with the new tool named Fact Sheet Web-Reports and to contact MROS about any ambiguities or uncertainties in connection with the recording of manual reports.

Further notes on data collection:

- **"n/a" info in the "SWIFT/BIC" code field**
  When analyzing reports, we have noticed that financial intermediaries often enter the value "n/a" or another placeholder in the mandatory field "SWIFT/BIC" when recording transactions. This field (or the SWIFT or SIC code contained therein) is used by MROS to combine new bank information with existing same information from previous reports. A SWIFT code of "n/a" is not suitable for this purpose and subsequently leads to a significant correction effort on the part of MROS. We therefore ask the financial intermediaries to always provide the SWIFT/BIC field exclusively with an existing code, be it the SWIFT code (minimum 8 digits) used in international payment traffic or the SIC code still in use in Swiss payment traffic. Therefore, only in absolutely exceptional cases should a placeholder be entered in the "SWIFT/BIC" field.

- **IBAN (own accounts)**
  In goAML there are two fields in the account mask: "Account/IBAN" and "IBAN". While the second field is not mandatory because it is not always available, MROS insists that this IBAN field is always filled in for own accounts and whenever possible also for counterparties. Only with the help of the IBAN can goAML combine identical accounts, which is not possible in most cases based on the mere account number. The counterparty involved in the transaction rarely knows the internal account number of a third party bank and usually uses the IBAN number (at least in European payment traffic).

- **Indicators for AIF/AIFT**
  When triaging the incoming reports, MROS regularly notices that the indicators entered by the financial intermediaries in goAML in connection with AIF/AIFT reports are often not correctly selected. If the AIF/AIFT report to be forwarded is a reply to a request under Art. 11a para. 1 or 2 (and 3) AMLA from MROS, the indicators must be selected as follows:

  For Art. 11a para. 1 and 3 AMLA

0009M	Art. 11a para. 1 and 3 AMLA
1132V	Art. 11a para. 1 and 3 AMLA
2024G	Art. 11a para. 1 and 3 AMLA

  For Art. 11a para. 2 and 3 AMLA

0010M	Art. 11a para. 2 and 3 AMLA
1133V	Art. 11a para. 2 and 3 AMLA
2025G	Art. 11a para. 2 and 3 AMLA

  However, if an AIF/AIFT report is not related to a request from MROS, but contains additional information that the financial intermediary wishes to provide to MROS on its own initiative (e.g., account closing orders received after the original report; further suspicious activity information, etc.), the indicators should be identical to those of the previous SAR or STR.

We look forward to continuing on the same path with you in 2021 and to ensuring that goAML is accepted and actively used by all parties involved as an efficient and safe tool.

Please contact us if you have any questions:

Questions about goAML
goAML Hotline +41 58 461 60 00 / e-mail: goaml.info@fedpol.admin.ch,

General questions to MROS (e.g. in connection with the status of a submitted report)
Preferably via Message Board in the goAML Web-portal or
via e-mail: mros.info@fedpol.admin.ch / phone +41 58 463 40 40

We thank you for the good cooperation.

Kind regards

Federal Office of Police fedpol

Money Laundering Reporting Office MROS