



# **FINANCIAL INTELLIGENCE AUTHORITY**

## **Guidelines on the Reporting of Large Cash and/or Monetary Transactions**

*(For Insurance Companies, Forex Bureaux, Money Remitters, Commercial  
Banks, Credit Institutions and Microfinance Deposit-taking Institutions)*

**March 9, 2015**

## **1. Citation and Commencement**

- 1.1 These Guidelines may be cited as the Financial Intelligence Authority Large Cash and/or Monetary Transactions Reporting Guidelines, 2015 and shall take immediate effect.

## **2. Background**

- 2.1 The Financial Intelligence Authority (FIA) is a Government of Uganda Agency established on July 1, 2014 under Section 18 of the Anti-Money Laundering Act (AMLA), 2013, to coordinate the implementation of the country's Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) regime. It is the central national agency in Uganda, responsible for the receipt and analysis of financial disclosures from accountable persons and dissemination of financial intelligence to competent authorities.
- 2.2 The FIA collects and collates information on suspicious transactions, large cash and monetary transactions and cross border movement of cash and negotiable bearer instruments from all reporting entities.

## **3. Objective**

- 3.1 To effectively discharge its functions, the FIA needs credible data. This data must therefore meet reporting standards as well as be filed to the FIA appropriately. Following the initial guidelines issued on August 22, 2014 and the subsequent meetings held with accountable persons, the FIA found it pertinent to develop more simplified reporting templates to ease the reporting process of large cash and/or monetary transactions for insurance

companies, forex bureau, money remitters, commercial banks, credit institutions and microfinance deposit-taking institutions. Consequently, the FIA is issuing guidance on the new reporting process. The rest of the accountable persons as listed in the second schedule of the AMLA, 2013 will still use the Form A reporting template issued in August 2014.

- 3.2 The objective of these guidelines therefore, is to inform the concerned accountable persons of the steps to be followed to submit large cash and/or monetary transaction reports (CTRs) to the FIA.

#### **4. Reporting Requirements**

- 4.1 Under section 8 of the AMLA, 2013, accountable persons are required to file large cash and/or monetary transaction reports with the FIA. These reports cover all transactions above Uganda Shillings 20,000,000= (Twenty million Uganda shillings).
- 4.2 The FIA has developed reporting formats (designated as Form A and attached as Annex 1 to these guidelines) customized for Commercial Banks, Credit Institutions and Microfinance Deposit Taking Institutions (MDIs); Insurance Companies and Forex Bureaus/Money Remitters. Reporting entities are therefore expected to use the appropriate reporting format.
- 4.3 The respective CTR templates can also be accessed on the FIA website: [www.fia.go.ug](http://www.fia.go.ug).
- 4.4 The reports should be filed by the designated Money Laundering Control Officers and in their absence, by their respective alternates. This should

however, be communicated to the FIA so as to enable the FIA hold the designated reporting officers accountable.

- 4.5 The reports shall be filed in an electronic format (MS Excel) on weekly basis, by **5:00pm every Tuesday** for the transactions of the preceding week.
- 4.6 All accountable persons are expected to put in place appropriate AML/CFT solutions as well as robust reporting systems to facilitate generation and filing of the reports to the FIA in the specified formats.
- 4.7 Specific guidance on how to fill Form A is provided in the Annex attached to these guidelines.

## **5. Confidentiality/Information Security**

- 5.1 Reporting entities are to treat all reports filed with the FIA as confidential. Under no circumstances should the customer of the reporting entity or any unauthorized person be aware that a report about them has been filed with the FIA.
- 5.2 All reports should be protected by reasonable security safeguards against such risks as unauthorized access, destruction, use, modification or disclosure. Access to all CTRs should be restricted and should be on a need-to-know basis.

## **6. Sanctions/Penalties**

- 6.1 Failure to comply with these reporting guidelines attracts both criminal and civil sanctions as clearly stipulated in sections 124 and 136 of the Anti-Money Laundering Act, 2013.

# ANNEX 1: THE CTR REPORTING TEMPLATES



## FINANCIAL INTELLIGENCE AUTHORITY – UGANDA LARGE CASH AND/OR MONETARY TRANSACTIONS REPORT (CTR) FORM A

(For Commercial Banks, Credit Institutions and Microfinance Deposit Taking Institutions)

Name of Accountable Person: .....  
 Head Office Address: .....  
 ID Allocated by FIA: .....  
 Report Period: .....  
 Report Submission Date: .....

Report Serial Number	Branch Name	Customer Name	Nationality	Identification Type	Account Number	Transaction Date	Transaction Type (Debit/Credit)	Instrument Type	Currency	Amount (IF) Foreign Currency	Amount in US\$	Purpose of Transaction	Originator/ Beneficiary Details
1													
2													
3													
4													
5													
6													
7													
8													
9													
10													
11													
12													



**FINANCIAL INTELLIGENCE AUTHORITY – UGANDA**  
**LARGE CASH AND/OR MONETARY TRANSACTIONS REPORT (CTR)**  
**FORM A**  
 (For Insurance Companies)

Name of Accountable Person: .....  
 Head Office Address: .....  
 ID Allocated by FIA: .....  
 Report Period: .....  
 Report Submission Date: .....

Report Serial Number	Branch Name	Customer Name	Nationality	Identification Type	Policy Number	Transaction Date	Transaction Type (Payment/Receipt)	Instrument Type	Currency	Amount (IF) Foreign Currency	Amount in US\$	Purpose of Transaction	Payer/ Payee Details
1													
2													
3													
4													
5													
6													
7													
8													
9													
10													
11													
12													



**FINANCIAL INTELLIGENCE AUTHORITY – UGANDA**  
**LARGE CASH AND/OR MONETARY TRANSACTIONS REPORT (CTR)**  
**FORM A**  
 (For Forex Bureaux and Money Remitters)

Name of Accountable Person: .....

Head Office Address: .....

ID Allocated by FIA: .....

Report Period: .....

Report Submission Date: .....

Report Serial Number	Branch Name	Customer Name	Nationality	Identification Type	Transaction Date	Transaction Type (Buy/Sale)	Currency	Amount of Foreign Currency	Amount in UShs	Purpose of Transaction	Originator/Beneficiary Details (For Money Remitters)
1											
2											
3											
4											
5											
6											
7											
8											
9											
10											
11											
12											

## **ANNEX 2: EXPLANATORY NOTES**

### **HEADING**

#### **Name of Accountable Person**

The reporting officer should clearly indicate the name of reporting entity.

#### **Head Office Address**

The head office address of the reporting entity should be stated.

#### **ID Allocated by FIA**

Indicate the Institution ID allocated by the Financial Intelligence Authority.

#### **Report Period**

The time frame covered by the reported transactions should be indicated in dd/mm/yyyy format e.g. week ended 06/03/2015.

#### **Report Submission Date**

Indicate the date the CTR is submitted to the FIA.

### **EXCEL FIELDS/COLUMNS**

#### **Field 1: Report Serial Number**

This field allows the reporter to assign unique reference numbers to each of the records in the CTR filed with the FIA.

#### **Field 2: Branch Name**

This field requires the reporter to capture the name of the branch where the account or insurance policy is held.

#### **Field 3: Customer Name**

This field allows the reporter to provide the full name of the natural person/legal entity being reported.



#### **Field 4: Nationality**

This field allows the reporter to provide the nationality of the person being reported.

#### **Field 5: Identification Type**

This field requires the reporter to indicate the type of identification document used by the person being reported. For example: indicate if a passport, national ID card or driver's license was used.

#### **Field 6: Account Number/Insurance Policy Number**

Under this field, the reporter is expected to capture the reported entity's account number/insurance policy number.

#### **Field 7: Transaction Date**

This field requires the reporter to capture the date when the transaction took place. Please take note of the format for reporting the date of the transaction which should be (dd/mm/yyyy).

#### **Field 8: Transaction Type**

This requires the reporter to capture the type of transaction carried out:

- i. For commercial banks, credit institutions and microfinance deposit taking institutions, the type of transactions maybe a debit (cash out of account) or a credit (cash into account).
- ii. For insurance companies, the transaction type is either receipt of funds (premium payment) or payment of funds (claims payment).
- iii. For forex bureaus/money remitters, it is either forex buy/money received or forex sale/money sent.

#### **Field 9: Instrument Type**

Indicate the type of instrument used to effect the transaction. Examples may include cheque, EFT, etc.

#### **Field 10: Currency**

The field requires the reporter to indicate the currency in which the transaction was conducted for example, US Dollar or Kenyan Shillings.

**Field 11: Amount (If) Foreign Currency**

If the transaction is in foreign currency the amount in foreign currency must be indicated in this field.

**Field 12: Amount in UShs.**

This field captures the amount involved in the transaction, in Uganda Shillings. If the transaction was in foreign currency, the equivalent Uganda Shillings value calculated at the time the transaction is concluded should be indicated.

**Field 13: Purpose of Transaction**

This field allows the reporter to briefly state the purpose of the transaction.

**Field 14: Originator/Beneficiary Details**

The details of the originator (for all in-coming transactions) or beneficiary (for out-going transactions) should be clearly captured in this field.