



FINANCIAL INTELLIGENCE AUTHORITY

GUIDELINES ON REPORTING INTERNATIONAL WIRE TRANSFERS

JANUARY 2021

A handwritten signature in blue ink, consisting of a stylized 'A' followed by a large loop.

1.0 Preamble

- 1.1 In accordance with Sections 20 (d) and 21 (i) and (j) of the Anti-Money Laundering Act, 2013 (as amended), and Regulations 34 and 35 of the Anti-Money Laundering Regulations 2015, the Financial Intelligence Authority (FIA) hereby issues the following guidelines for the reporting of International Wire Transfers.
- 1.2 These Guidelines may be cited as the Financial Intelligence Authority International Wire Transfer Reporting Guidelines, 2021 and shall take effect on April 1, 2021.
- 1.3 Wire transfer refers to any transaction carried out on behalf of an originator through a financial institution by electronic means with a view to making an amount of funds available to a beneficiary person at a beneficiary financial institution, irrespective of whether the originator and the beneficiary are the same person¹. Wire transfers may be cross-border or domestic. These guidelines specifically focus on international wire transfers.

2.0 Objective

- 2.1 Given that money laundering and terrorist financing are transnational crimes, international wire transfers are one of the financial instruments at risk for money laundering and terrorist financing operations. Money launderers use international wire transfers in the second stage of the laundering process, which is the layering stage. The goal is to move the funds from one jurisdiction to another with each layer of transactions making it more difficult for law enforcement agencies to trace the origin of the funds.
- 2.2 The main objective of putting in place international wire transfer control measures is to prevent criminals from having unfettered access to wire transfers for moving their funds, and for detecting such misuse when it occurs.
- 2.3 By implementing this reporting requirement, the Financial Intelligence Authority seeks to ensure that basic information on the originator and beneficiary of international wire transfers is available for analyzing suspicious or unusual activity, and disseminating the resulting financial intelligence to the law enforcement agencies if deemed necessary.
- 2.4 The objective of these guidelines therefore, is to inform the concerned accountable persons of the requirement to report international wire transfers, and the steps to be followed to submit the reports to the FIA.

¹ Financial Action Task Force 40 Recommendation, 2012

3.0 Scope

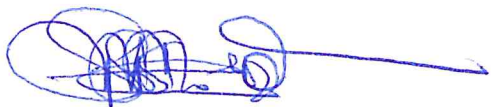
- 3.1 These guidelines are addressed to all Accountable Persons that facilitate international wire transfers, as specified in the Second Schedule of the Anti-Money Laundering Act, 2013 as amended.
- 3.2 The guidelines do not apply to financial institution-to-financial institution transfers and settlements, where both the originator person and the beneficiary person are financial institutions acting on their own behalf.

4.0 How and When to Report

- 4.1 The FIA has developed a reporting format (designated as International Wire Transfer Report goAML Web Form and attached as Annex 1 to these guidelines). Reporting entities are therefore expected to use this reporting format to file the reports. The reporting template can be accessed on the FIA website: <https://goaml.fia.go.ug/PRD>.
- 4.2 The reports should be filed by the designated Money Laundering Control Officers and in their absence, by their respective alternates, on a weekly basis, by **5:00pm every Tuesday** for the transactions of the preceding week.
- 4.3 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 format.
- 4.4 Specific guidance on how to fill International Wire Transfer Report goAML Web Form is provided in the Annex attached to these guidelines.

5.0 Additional Information

- 5.1 If an accountable person required to file an international wire transfer report, due to technical challenges or for any another reason acceptable to the FIA is unable to file the report using the goAML platform, such a person must file the report through the email: iwtr@fia.go.ug but once the technical challenges are resolved, all email submissions must be re-uploaded on the goAML system.
- 5.2 For additional information on international wire transfer report and other related matters email: goamlhelpdesk@fia.go.ug



Sydney Asubo
Executive Director

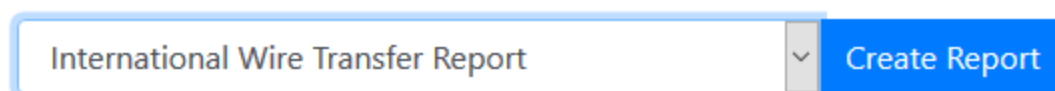
Annex: International Wire Transfer Report goAML Web Form Submission Guide

1. Creating an International Wire Transfer Report (IWTR)

Manual web reports can be created by opening the menu item **New Reports > Web Reports** from the main menu.

Select the required report type, i.e **International Wire Transfer Report** as shown in the image below and then select **Create Report**

Select a report type to continue



International Wire Transfer Report

Create Report

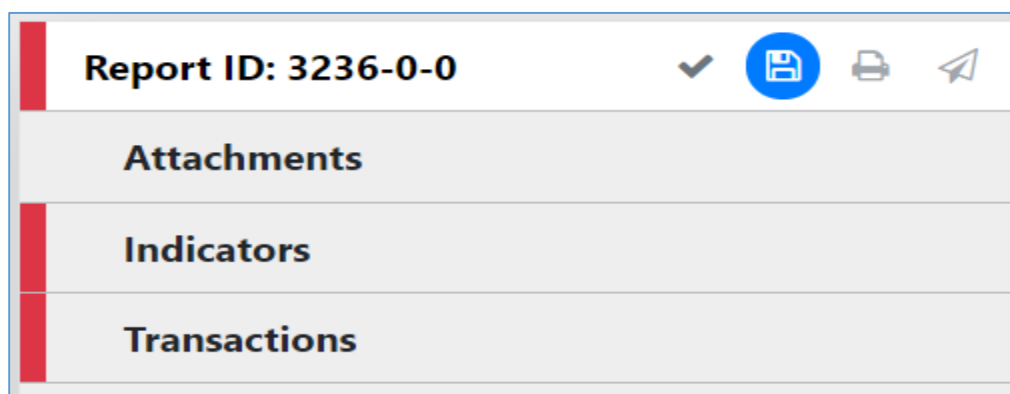
Please select a report type and click **Create Report** to continue

Figure 1

2. Report Main Page

2.1. Report Main Page Tab

The Web Report Form is split into two main areas. On the left is the Navigation panel that allows the user to jump to different areas of the report and to see which areas are still missing or have invalid information. The image below is an example of how the navigation panel is shown for a new Transactions web report.



Report ID: 3236-0-0

Attachments

Indicators

Transactions

Figure 2

The **Report Tab** in the Navigation Panel is selected by default and is the Report Main Page. In this tab is the report ID and the actions that can be associated with a report.

The **Red** bar on the left of a tab indicates that the data for that tab is incomplete or invalid. Also, for the Report tab, the bar is also red if ANY of the other sections below are red. All of the red bars must be green for the report to be submitted. Tabs without a red or green bar are optional.

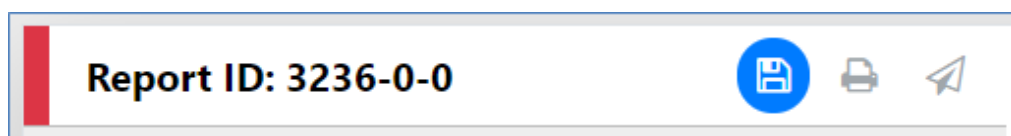


Figure 3

Once the whole report is complete and valid the bar on the left of the Report tab will appear green as shown below.

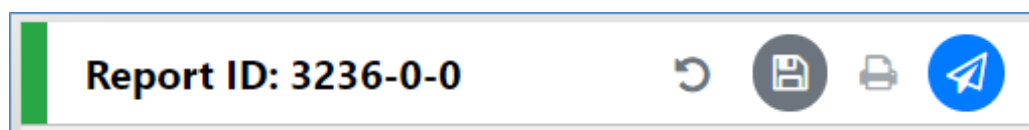






Figure 4

The actions on the **Report Tab** are

	Undo Delete This is only shown after a Delete operation. When clicked the deleted object will be restored.
	Save Saves the report. This can be done at any time and allows the user to reload the report in its current state to be completed later.
	Print Preview This opens the report in a new tab in a print ready format. If there are changes made in the report form since the report was last saved the button will be disabled. Once the report is saved it will be enabled again. This is because the preview shows the report that was last saved, so that there is no discrepancy between what is shown in the form and what is shown in the preview.
	Submit

	<p>Once the form is complete and valid the bars on the right of each tab will appear green and the submit button will be enabled.</p> <p>Clicking the submit button will show the dialogue below</p> <div data-bbox="391 373 984 642" data-label="Image"> </div> <p>Once the form is submitted it will not be possible to edit or re-submit the report. Selecting yes will submit the report and return the user to the report type selection screen, The report will now be available in Submitted Reports grid.</p>
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2.2. Report Main Page Form

The Report Main page shows the Report Headers, the Reporting Person and the Location sections of the Report. The report type is displayed at the top and underneath the **Local Currency Code**, the **Reporting Entity** and **Reporting Entity ID** are for the RE that the user is logged in as and the **Report ID** for the current report.

International Wire Transfer Report

Local Currency Code: UGX	Reporting Entity: Financial Intelligence Unit (FIU)	Entity ID: 1	Report ID: 3715-0-0
--------------------------	---	--------------	---------------------

• Reporting Entity Branch

Reporting Entity Reference

• Reference Date

FIU Reference

Reason

Action

▼ Reporting Person Load current user

Title

• First Name

• Last Name

Email

Gender

Birth Date

NIN

Nationality 1

Occupation

• Passport Number

Passport Country

▼ Location Load current user

• Type

• Address

Town

• City

Zip

• Country

State

Figure 5

2.2.1. Reporting Person

When a form is first loaded, the **Reporting Person** section is auto-populated with the details of the user you are logged in as

This person object cannot be edited in the same way that other person objects can be. Once the form is saved, the reporting person will stay the same

If another user opens the form, it is not automatically overridden by that user.

However, if you want to change the reporting person details with your own details. Or if you have updated the details that you want reflected in the saved report, click on the **Load Current User** button in the top right of the **Reporting Person** collection.

A confirmation dialog will be displayed asking if you wish to replace this person object with the details of the current user.

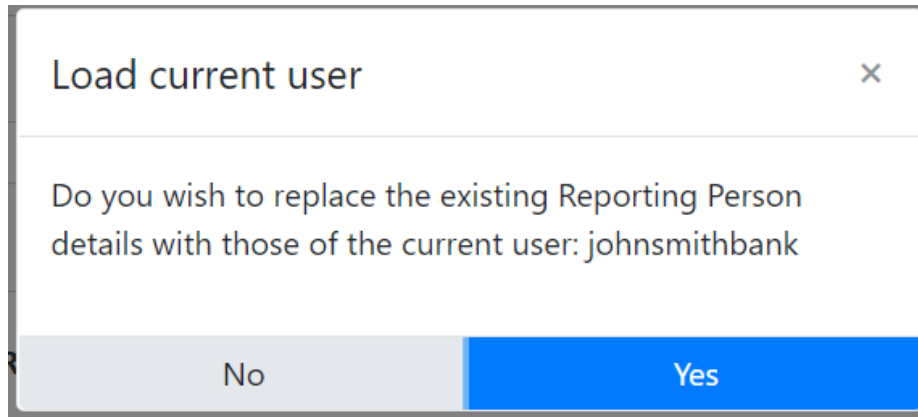


Figure 6

Select **Yes** to make the replacement

3. Transactions

3.1. Transactions List Tab

Selecting the Transactions List tab will show the list of Transactions in a grid containing the Transaction Number, Date, Amount and Transmode code for each transaction. The total number of Transactions in the report is shown in a badge next to the **Transactions** header and the total amount of all the values of the transactions in the report are shown on the right of the tab.



Figure 7

The image below is an example of when the mouse pointer is hovered over the Transactions List Tab. This shows the actions that can be done on the transactions list.

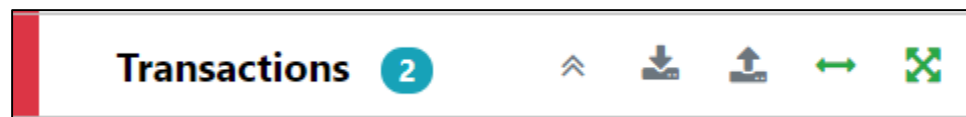







Figure 8

The actions on the transactions list are:

	<p>Expand / Collapse</p> <p>Expand or collapse the transaction trees in the navigator. When the trees are collapse there is only a tab for each transaction in the list under the Transactions List tab.</p>
---	---

	Download all the transactions in the report <i>See the section below on uploading/ downloading transactions</i>
	Upload transactions <i>See the section below on uploading/ downloading transactions</i>
	Create a new Bi-Party transaction

3.2. Transactions List

Transactions 




Status	Number	Date	Local Amount	Transmode Code	
×	TRNWEB0819 21 NOV 19	11/8/2019	123	ATM	
×	TRNWEB0820 21 NOV 19	11/7/2019	123	Remittance	

Figure 9

3.3. Transaction Tab

Selecting the Transaction tab, the transaction form in the editor for that particular transaction. The indicator  shows that the transaction is a Bi-Party and the transaction number and amount are also displayed.

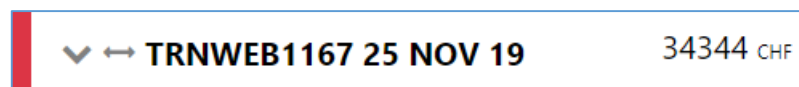


Figure 10

When the mouse pointer is hovered over the transaction tab the actions to download or delete the transactions are displayed.

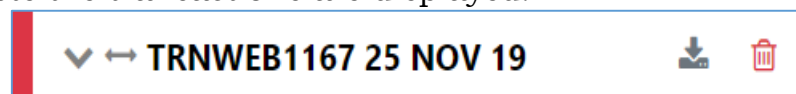


Figure 11

When a transaction is populated, a sub-Tab is created under the Transaction Tab for each **Account**, **Person** or **Entity** that is added to the transaction. The image below shows a Bi-Party transaction from and Account called *MyAccName* to a Person called *James Smith*. The account contains an Entity called *MyEntityName* which in turn contains director (which is a person object) called *MyDirectorName*.

Each of these sub-tabs can be selected to navigate immediately to that object in the transaction.

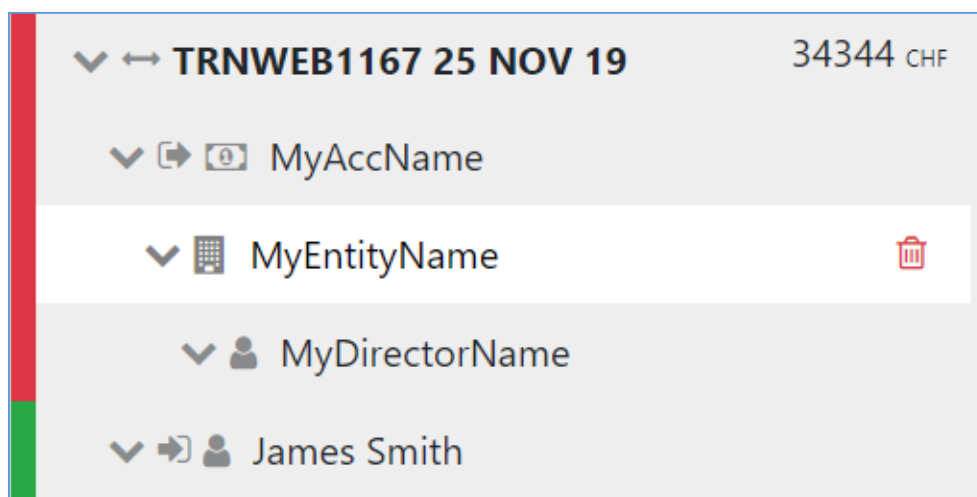


Figure 12

	Expand / Collapse
	Bi-Party Transaction
	Multi-Party Transaction
	From
	To
	Account (account name is shown as title)
	Entity (entity name is shown as title)
	Person including Directors (first name and last name are shown as title)

3.4. Transaction Form

Once a transaction is added the Transaction form will be shown. An example of a Bi-Party transaction form is given below. The fields which are mandatory will be displayed in pink with a red outline.

The screenshot shows a 'Transaction' form with the following fields and their status:

- Number is required!** (pink box)
- Local Amount is required!** (pink box)
- Date is required!** (pink box, value: M/d/yyyy)
- Transmode Code is required!** (pink dropdown menu)
- Description is required!** (pink text area)
- Comments** (white text area)
- From** (pink box with buttons: + Account, Account (My Client), + Person, Person (My Client), + Entity, Entity (My Client))
- To** (pink box with buttons: + Account, Account (My Client), + Person, Person (My Client), + Entity, Entity (My Client))
- Goods and Services** (pink box with button: + Goods and Services)

Other fields include: Internal Reference Number, Transmode Comment, Teller, Late Deposit?, Posting Date, Location, and authorized.

Figure 13

To add a party to either the **From** or **To** select one of the 6 buttons **Account**, **Account My Client**, **Person**, **Person My Client**, **Entity** or **Entity My Client**

3.4.1. Fields

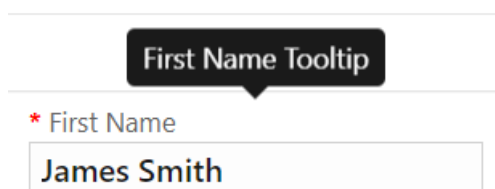
Mandatory fields are shown by a red asterisk next to the field name.

* Address
Some Address

If there are validation errors on the field the field is highlighted pink and the error is shown in place of the field name.

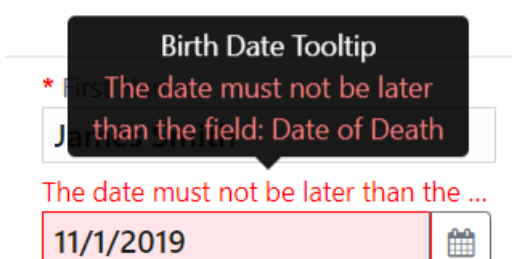
Address is required!
|

Hovering the mouse pointer over the field name provide a Tooltip for the field. There may be extra information available here to determine what values should be entered.




A screenshot of a form field labeled "First Name" with a red asterisk. The field contains the text "James Smith". A black tooltip box with white text "First Name Tooltip" is positioned above the field.

Tooltips also show the error messages if there is not enough room to show them in the form.



A screenshot of a form field labeled "Birth Date" with a red asterisk. The field contains the date "11/1/2019". A black tooltip box with white text "Birth Date Tooltip" is positioned above the field. The tooltip contains the error message "The date must not be later than the field: Date of Death" in red text. Below the tooltip, the error message is repeated in red text: "The date must not be later than the ...".

Some fields are mutually exclusive, such as the **institution code** and **swift** in the Account object. Only one of them can be selected and is required. Use the radio buttons on the left of the field to activate the field before entering data.



A screenshot of two form fields. The first field is labeled "Institution Code is required!" in red text and has a red border. It contains a radio button that is selected. The second field is labeled "* Swift" and has a grey border. It contains a radio button that is not selected.

3.4.2. Collections

Some objects contain a collection of other objects, for example Figure 14 below shows some of the collections for a **Person** object.

Clicking on the **+** button on the left of the collection name adds another object to this collection. Once the maximum number of objects have been added the button is greyed out. In the image below the **Employer Address** button is greyed out because only a maximum of 1 object can be added. Whereas the **Addresses** Collection button is still active even though there are 2 two objects already added as there is no limit on the objects for the Addresses collection. If there is a minimum of 1 object required in the collection then the object will be added automatically when the Person, Account or Entity is created.

Figure 14

3.4.3. Reuse of objects

Several objects in the web form can be reused to prevent having to repeat filling out the data multiple times. The objects are **Account**, **Person**, **Entity** and **Address**. (and the associated **'My Client'** objects)



This is done by selecting the icon in the top right corner of a reusable object this will open a dialog, like the one shown below for **Persons** below.

First Name	Last Name	Birth Date
John	Smith	
James	Smith	

Figure 15

Select a row for the object you wish to re-use and then select the **Select** button. The data from the object will be copied into the form from where the dialog was opened.

N.B. Once an object is re-used it is linked. This means that when an object is reused, any changes in either of those objects will be reflected in the other. So for example if a **Person** *John Smith* was re-used in several transactions in the form. If the last name was changed in one of those objects it will be reflected in all of the other instance. The headers of the reusable object are **NOT** copied or linked.

When adding a party to a Transaction the headers of the object are slightly different depending on where the party is being added to the transaction.

For example the two images below show a **Person** object added as a **From** and **To** respectively. The headers of the party are shown with a blue dotted line.

These headers are **NOT** copied across when an object is re-used and are specific to that particular party instance.

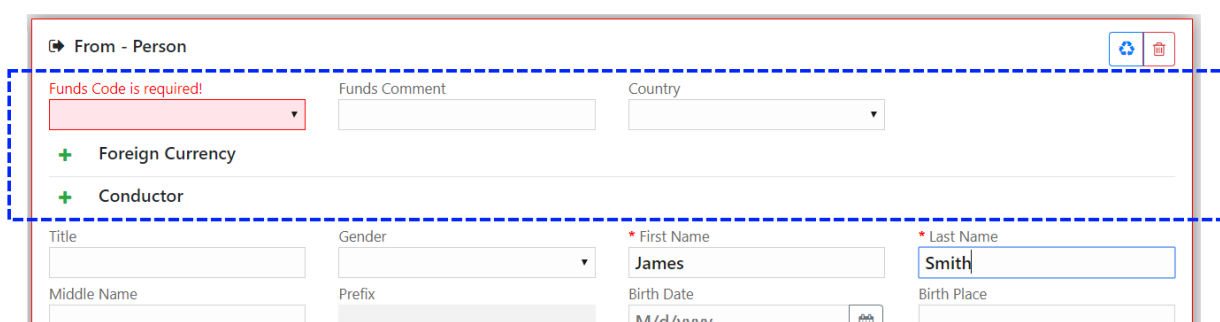


Figure 16

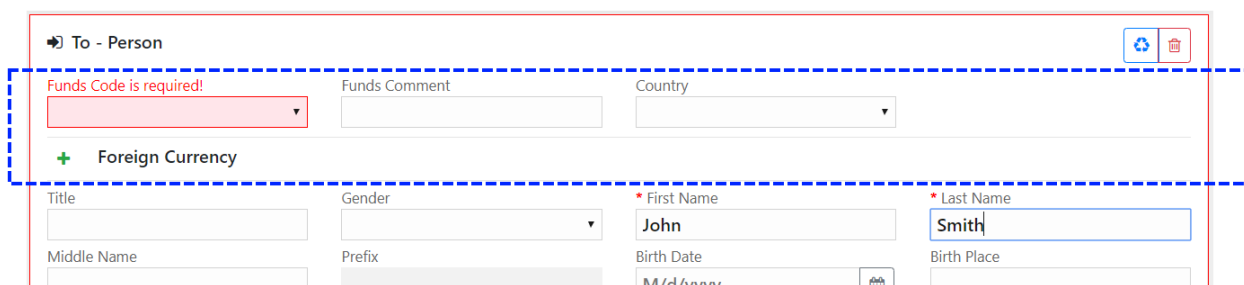


Figure 17

When objects are re-used, they are linked. There is a linked badge that is shown next to the object buttons along with a number that identifies how many other objects are linked to this one.










Person	First Name John	Last Name Smith	Birth Date	 3  
Person	First Name John	Last Name Smith	Birth Date	 3  
Person	First Name John	Last Name Smith	Birth Date	 3  

Figure 18

In the Navigation panel – selecting a re-used object also identifies which other objects are linked to that one. In the figure below, when selecting the *John Smith* person, both *John Smith* person objects show an icon indicating there are linked.

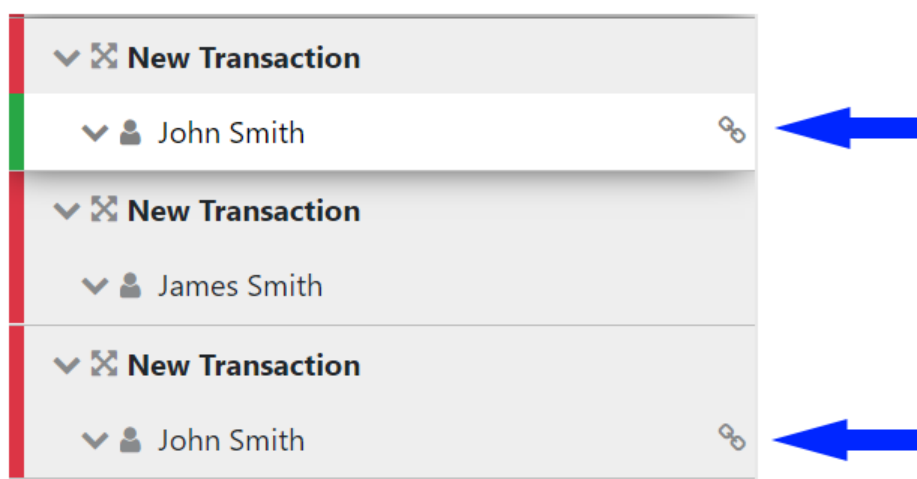


Figure 19


4. Transactions Upload/Download

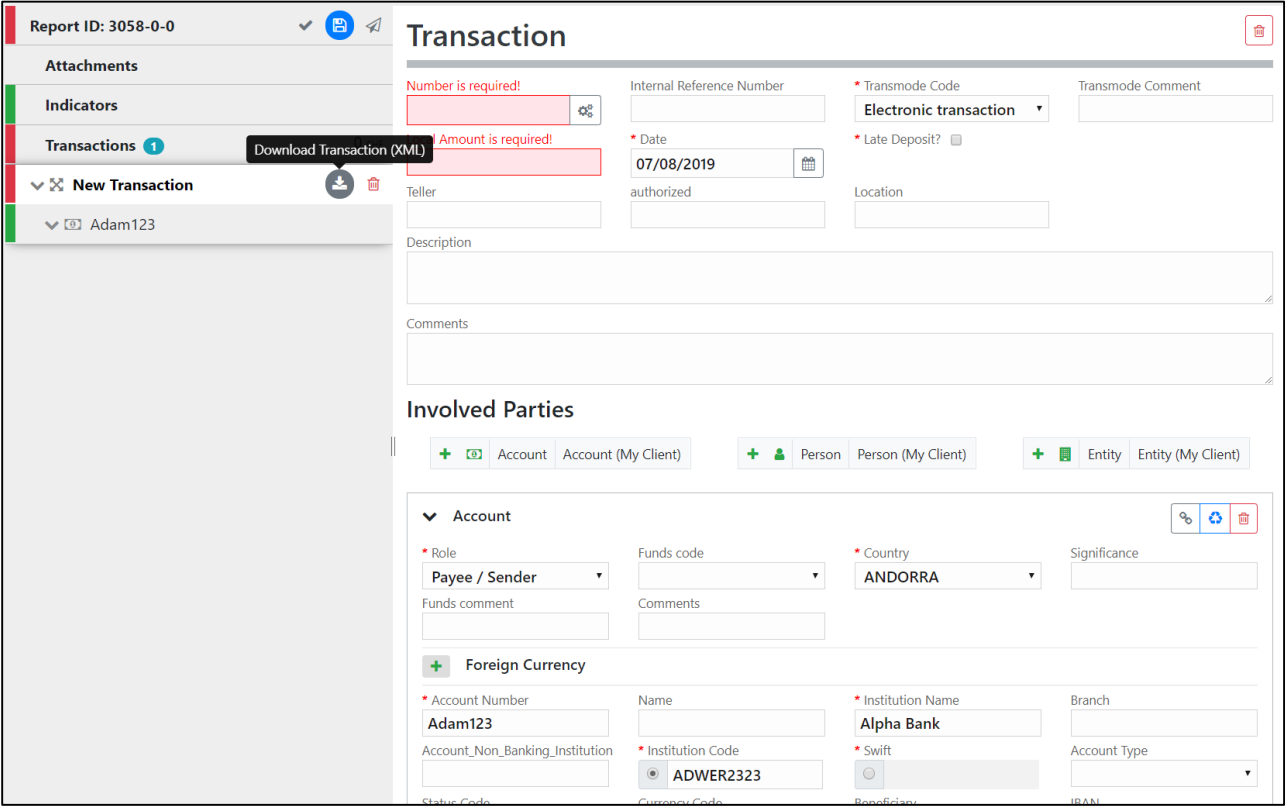
The goAML Web Form provides the ability to upload and download, full and partial transactions as XML files. This allows users to create and re-use templates that can speed up the manual entry of reports.

4.1. How to Download a Transactions

Figure 20 shows a goAMLWeb report that has been partially completed. It contains a single transaction with an Account. It may be required that the user wishes to submit several transactions that contain this account and will therefore want to download the transaction as it is so that it can be re-used as a template.

Any transactions can be downloaded, it is not necessary for a transaction to be valid or complete.

In order to download the transaction as XML, hover the mouse over the Transaction in the navigator pane on the left of the report and the download icon  will appear. Hovering over this will show the tooltip **Download Transaction (XML)**. Clicking this button will download the transaction.



Report ID: 3058-0-0

Transaction

Attachments

Indicators

Transactions 1

New Transaction

Adam123

Download Transaction (XML)

Number is required!

Amount is required!

Internal Reference Number

Transmode Code: Electronic transaction

Transmode Comment

Date: 07/08/2019

Late Deposit?

Teller

authorized

Location

Description

Comments

Involved Parties

Account (My Client)

Person (My Client)

Entity (My Client)

Account

Role: Payee / Sender

Funds code

Country: ANDORRA

Significance

Funds comment

Comments

Foreign Currency

Account Number: Adam123

Name

Institution Name: Alpha Bank

Branch

Account_Non_Banking_Institution

Institution Code: ADWER2323

Swift

Account Type

Figure 20

Figure 21 - Downloaded Transaction XML below shows the resulting XML that is downloaded. Only the fields that are provided in the report are given in the XML. Some fields that are mandatory, such as **transaction number** are also included,

but are provided as an empty tag.

```
<?xml version="1.0"?>
- <reportdata>
  - <transactions>
    - <transaction>
      <transactionnumber/>
      <date_transaction>2019-08-07T00:00:00</date_transaction>
      <transmode_code>C</transmode_code>
      <amount_local/>
      - <involved_parties>
        - <party>
          <role>A</role>
          - <account>
            <institution_name>Alpha Bank</institution_name>
            <institution_code>ADWER2323</institution_code>
            <account>Adam123</account>
          </account>
          <country>AD</country>
        </party>
      </involved_parties>
    </transaction>
  </transactions>
</reportdata>
```

Figure 21 - Downloaded Transaction XML

Everything inside the <transaction> tags follow the structure of the goAML Schema.

The difference between the XML used to download/upload transactions and the schema is that the transactions are *wrapped* in the <reportdata> and <transactions> tags. This is because multiple transactions can be downloaded or uploaded at once, and so a root element is required (**reportdata**). The group element (**transactions**) is used so that the functionality can be extensible in the future to accommodate other groups of reusable objects such as Persons, Accounts and Entities.

The following XML example shows how multiple transactions will appear when downloaded.

```
<reportdata>
  <transactions>
    <transaction>
      ...
    </transaction>
    <transaction>
      ...
    </transaction>
  </transactions>
```

`</reportdata>`

All transaction files that are downloaded can be used immediately for uploading as templates for new transactions.

Figure 22 - Download All Transactions shows where to download all the transactions in the report. Hovering the mouse pointer over the **Transactions** header in the left navigator will display the button.

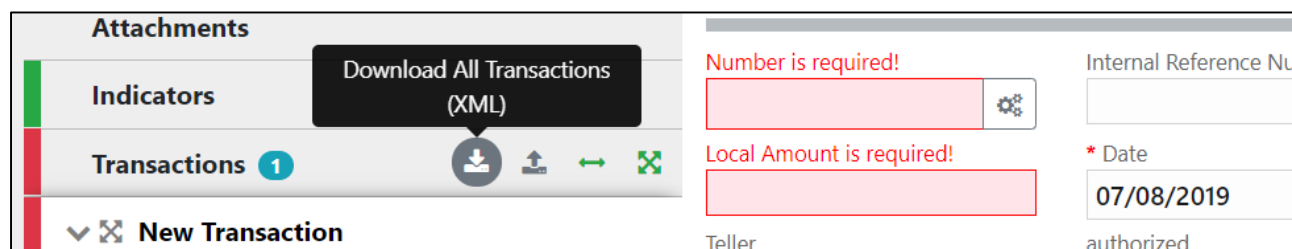


Figure 22 - Download All Transactions

4.2. How to Upload Transactions

The first thing to do before uploading transactions is to make sure that the XML is correct.

Each transaction should be inside a `<transaction>` tag and must follow the goAML schema structure, however it does not have to be valid, i.e. the data does not have to be complete or conform to the restrictions of the schema such as mandatory, min/max, decimal etc.

The transactions should then be placed inside `<reportdata>` and `<transactions>` tags as shown in Figure 23 below. It is also possible to upload each transaction individually in separate files however even a single transaction must be contained in these *wrapper* tags for it to be uploaded successfully.

```

- <reportdata>
  - <transactions>
    - <transaction>
      <transactionnumber/>
      <date_transaction>2019-08-07T00:00:00</date_transaction>
      <transmode_code>C</transmode_code>
      <amount_local/>
      - <involved_parties>
        - <party>
          <role>A</role>
          - <account>
            <institution_name>Alpha Bank</institution_name>
            <institution_code>ADWER2323</institution_code>
            <account>Adam123</account>
            <country>AD</country>
          </account>
        </party>
      </involved_parties>
    </transaction>
    - <transaction>
      <transactionnumber/>
      <date_transaction>2019-08-10T00:00:00</date_transaction>
      <transmode_code>C</transmode_code>
      <amount_local/>
      - <involved_parties>
        - <party>
          <role>A</role>
          - <account>
            <institution_name>Alpha Bank</institution_name>
            <institution_code>ADWER2323</institution_code>
            <account>Adam123</account>
            <country>AD</country>
          </account>
        </party>
      </involved_parties>
    </transaction>
  </transactions>
</reportdata>

```

Figure 23

Once the file is ready for upload, place the mouse over the **Transactions** header in the left hand navigator so that the **Upload Transactions (XML)** button is displayed as shown in Figure 24 and click it to open the file dialog.

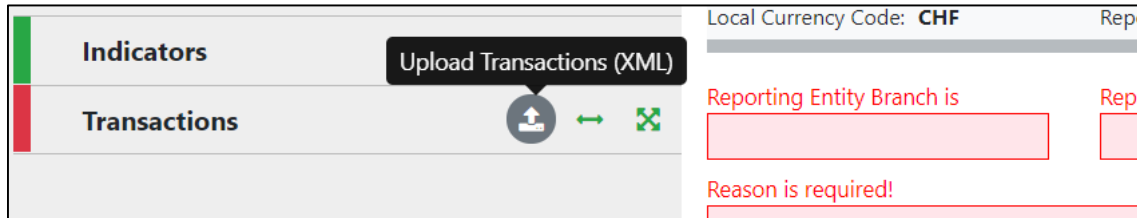


Figure 24

Select the file containing the transactions and click the **Upload** button as shown in Figure 25

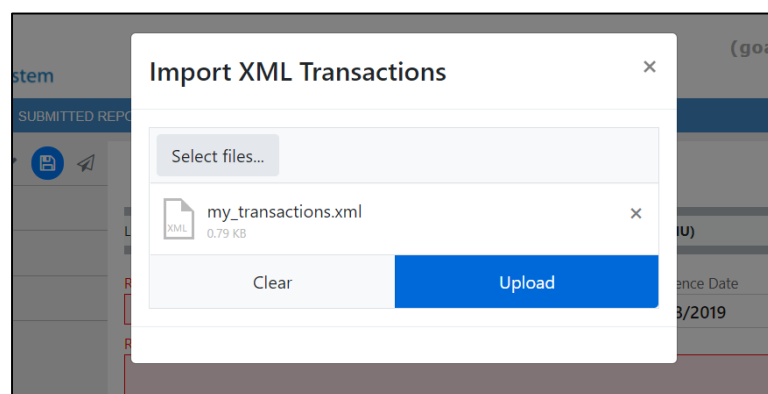


Figure 25

The file will be read and the transactions will be added to the report as shown in Figure 26.

Figure 26

All transactions are added to the report as they are shown in the file. There is no processing on the report or file. For example, if there is an existing transaction in the report with the same number as one in the file, it will result in two transactions in the report with the same number. Any linking of accounts must also be done manually after the transactions have been uploaded.

4.3. Linking of Accounts


After transactions have been uploaded, all objects such as Persons, Accounts and Entities are treated individually, that means that changing the data on one object will not change the data on any of the other objects even if they have the same data.

For Accounts, it is possible to link objects that share a matching **Account Key** so that any changes to one of those Account objects will be reflected in all others. The Account key is based on a combination of *Account Number* + *Institution Name* + *Institution Code* or *Swift*. See “Template for Account matching logic” for examples.

For example:

Figure 27

In Figure 27 there are three uploaded transactions each with an Account. The first two Accounts have the same Account number **Adam123**. The first account is selected and highlighted in the editor.

By clicking on the **Link Accounts** button  of the first account, all the information of the first account will be copied to the second account (and any other accounts that have this number). After this any change to either of these accounts will be reflected in the other. The account **Sarah123** is not affected.

The green box in Figure 28 shows the areas that contain the linked account data. The red boxes show **From** and **Foreign Currency** objects which are not part of the **Account** object and are therefore not linked.

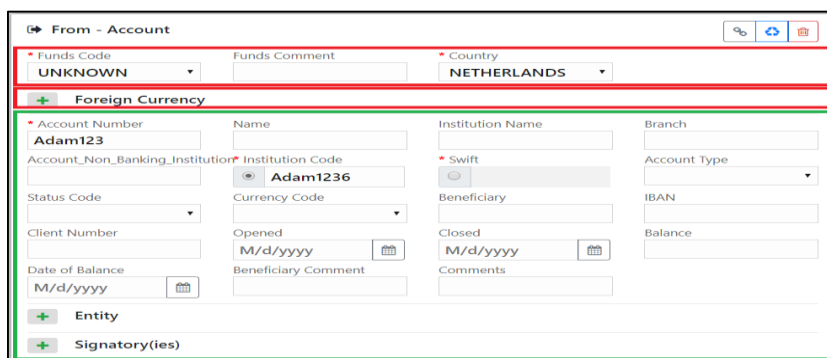


Figure 28

Template for Account matching logic

Account matching based on combination of account data		result
Account Number: 11111	Account Number: 11111	Match
Account Number: 11111 Institution Name: BankA	Account Number: 11111 Institution Name: BankA	Match
Account Number: 11111 Institution Code: BABA	Account Number: 11111 Institution Code: BABA	Match
Account Number: 11111 Swift: ABC	Account Number: 11111 Swift: ABC	Match
Account Number: 11111 Institution Name: BankA Institution Code: BABA	Account Number: 11111 Institution Name: BankA Institution Code: BABA	Match
Account Number: 11111 Institution Name: BankA Institution Code: BABA Swift: ABC	Account Number: 11111 Institution Name: BankA Institution Code: BABA Swift: XYZ	Match
Account Number: 11111 Institution Name: BankA Swift: ABC	Account Number: 11111 Institution Name: BankA Swift: ABC	Match
Account Number: 11111 Institution Name: BankA	Account Number: 11111 Institution Name: BankA	No match

Swift: ABC	Swift: XYZ	
Account Number: 11111 Institution Name: BankA Institution Code: BABA Swift: ABC	Account Number: 11111 Institution Name: BankA Institution Code: BABC Swift: ABC	No match
Account Number: 11111 Institution Name: BankA Swift: ABC	Account Number: 11111 Institution Name: BankB Swift: XYZ	No match
Account Number: 11111 Institution Name: BankA	Account Number: 11111 Institution Name: BankB	No match
Account Number: 11111	Account Number: 22222	No match

Note

The International Wire Transfer Report (Report Code: IWTR) can be submitted using the same XML format as the Large Cash Transaction Report (Report Code: LCTR) with the only difference being the type of transactions captured as per the guidelines from the Financial Intelligence Authority (FIA). These guidelines state that the Large Cash Transactions are transactions that meet the threshold of Ugx 20,000,000 (twenty million uganda shillings only) while International Wire Transfers are transactions that involve either a source or destination that is outside of Uganda irrespective of the transaction amount.