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Federal Department of Justice and Police FDJP

Federal Office of Police fedpol
Crime Prevention & Law
Money Laundering Reporting Office Switzerland MROS

goAML: Frequently Asked Questions (FAQ)

Status: September 2022
Version: 5.1

General questions

1	**What has changed in the process for submitting suspicious activity reports from 1st January 2020?**	Since January 1, 2020, suspicious activity reports and other information are no longer sent to MROS by fax but via the new data processing system goAML.
2	**Where can further information about the new data processing system goAML be found?**	Further information on goAML is regularly published on the following MROS website: https://www.fedpol.admin.ch/fedpol/en/home/kriminalitaet/geldwaescherei/meldung.html System-related information can also be found in the UNODC web site: https://goaml.unodc.org/. However, the information published on this site is of a general nature and does note address the country-specific adaptations made by MROS. For this purpose, we refer to the MROS website.
3	**Does a financial intermediary have to register in goAML under all circumstances?**	There is no general obligation to register in goAML. MROS recommends that financial intermediaries subject to the reporting obligation only register for the use of goAML if they wish or are required to submit a report or a reply to an art. 11 AMLA request from MROS.

Login to goAML

| 4 | **Why was a two-factor authentication introduced for goAML?** | In order to further improve the already high security standard, MROS has also introduced a two-factor authentication for the system login of external users of goAML.

 The corresponding registration page is available on the Internet at https://www.fedpol.admin.ch/fedpol/en/home/kriminalitaet/geldwaescherei/meldung/registrierung.html. A detailed step-by-step guide to the registration process is available on our homepage. |

5	**Can I change my goAML password myself?**	No, since the password is stored in a separate system, we always require a written request to goaml.info@fedpol.admin.ch. It is mandatory to mention the LoginID in case of such a request.
6	**I entered the password and could not log in. What should I do?**	First, clear the browser history (cache) of your browser and restart it. If this does not work despite entering the correct password, please contact us via goaml.info@fedpol.admin.ch and we will provide you with a temporary password.
7	**I have not logged into goAML for a long time and my login attempt was now unsuccessful.**	The settings in the security portal (SSO) are such that an account is deactivated six months after the last successful login. Please contact MROS via goaml.info@fedpol.admin.ch and your account will be unlocked.
8	**I am registered as goAML admin. Can I create new accounts for my colleagues?**	No, this is not possible with the implementation of the 2-factor authentication. All new users must therefore fill out the application form published on our website: https://www.fedpol.admin.ch/fedpol/en/home/kriminalitaet/geldwaescherei/meldung/registrierung.html

Technical requirements and data security

9	**What does "XML" mean?**	"XML" is an IT language used to structure large amounts of data (e.g. for a suspicious activity report).
10	**What are the technical requirements to use goAML for financial intermediaries?**	In the case of a manual registration process, Internet access and personal login data are sufficient to log into the web-based registration tool. The prerequisite for this is a prior registration as a goAML user.

Semi-automated (see question 27) or automated reporting requires that the financial intermediary has developed an internal IT solution that ensures that the XML file is created in the structure defined by MROS (the structure is published on the Internet in the document "*Standard XML Reporting - Instructions and Specifications for goAML*": https://www.fedpol.admin.ch/fedpol/en/home/kriminalitaet/geldwaescherei/meldung.html). |
| 11 | **Which browsers are supported by goAML?** | Currently the browsers Mozilla Firefox, Google Chrome and Microsoft Edge (Chromium; 2020 version only) are supported for the use of goAML. The web browser Internet Explorer IE and older Edge versions cannot be used. |
| 12 | **How secure are the data that are stored in the new data processing system?** | Data submitted to MROS via the new data processing system are transmitted by a secure HTTPS connection from the financial intermediary to a 'demilitarised zone' (DMZ). The DMZ is located outside the network of the federal authorities and is protected by firewalls, encrypted communication, antivirus software and user identification via two-factor authentication mechanisms. At brief, regular intervals the DMZ entries are transmitted to the network of |

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		the federal authorities by means of one-sided data pull technology and subsequently deleted in the DMZ. Once in the federal network, the data are strictly protected by further IT security measures.
13	**Will personal data of goAML users be forwarded to third parties?**	No. At no time will personal details of the registered goAML users be shared with any third party. If MROS passes on a suspicious transaction report to a law enforcement authority, neither the details of the financial intermediary involved nor of the reporting compliance staff will be passed on.
14	**Can UNODC access MROS data?**	**No, this is not possible at any time**. UNODC is only the software provider. At no point in time is UNODC permitted by law to view or access MROS data.
15	**Is it possible to view or download an already archived report?**	No, if a report is displayed as "archived", there is no possibility to view or download it again. It is therefore important that a local copy is saved immediately after filing a report.
16	**I mistakenly created an AIF(T) instead of a SAR/STR and the report was consequently rejected by MROS. Do I have to enter everything again?**	No, as long as the reworking of the report is done promptly, i.e. has not yet been archived, the XML file can be downloaded and adapted via the disk icon in the web portal. Thus, an AIF can be turned into a SAR and an AIFT into a STR. This is also possible in the opposite direction (STR to AIFT, SAR to AIF).
17	**I don't get the automated goAML notifications although I have a new message in the message board.**	Please check your settings. Often, company settings are the reason why such automated notifications are blocked by the sender "goAML Workflow [mailto:goamlVALIDATION@fedpol.admin.ch] ".
18	**Why can I no longer view or save a reported report or message board message for my records?**	For security and storage capacity reasons, reports and message board notifications including attachments are automatically deleted by the system within a certain period. The deletion periods are the following: Transmitted reports: 7 days after transmission Rejected reports that have already been moved to draft status: 7 days Draft reports: 14 days Message board notifications: 30 days

Reporting procedure

19	**What is the process for manually entering a report in goAML and how much time is involved?**	Manual recording (whether in connection with a suspicious activity report or following of a request for information accordingly to Art. 11a para. 1 and 2 or 3 AMLA) can be carried out by the persons registered as users via the Internet directly in the web portal of goAML. For this purpose, the relevant information must be entered online

		and the individual fields must be filled in. Depending on the type of report, manual entry can be time-consuming. Especially if many transactions have to be recorded. The registration is carried out completely online without the use of other third-party systems. Information on the other recording options can be found on the Internet at https://www.fedpol.admin.ch/fedpol/en/home/kriminalitaet/geldwaescherei/meldung.html.
20	**Must all transactions be submitted electronically?**	All suspicious transactions (up to a maximum of 100 transactions) have to be submitted in electronic form. This means that they are to be entered either completely manually or semi-automatically (see question 27) in goAML or can be submitted via XML file. Please also consult our letter "Adjustments in goAML reporting" dated April 1, 2021 (to be found here under the tab *Documents*).
21	**Is it enough to report only the suspicious transactions or must all transactions falling within a certain time period be filed?**	Yes, only the suspicious transactions are required (up to a maximum of 100 transactions). The text of the report must explicitly state why the financial intermediary knows or suspects that the reported assets are of criminal origin. MROS may at any time exercise its right under art. 11a para. 1 AMLA to complete the report received and subsequently request additional information, including on transactions. These transactions must also be submitted to MROS via goAML.
22	**Does the limit of max. 100 reported transactions also apply to AIFT reports?**	No, this limit explicitly does not apply to AIFT reports. If, for example, a financial intermediary replies via AIFT to a request from MROS to provide information accordingly to art. 11a para. 1 or 2 AMLA, it may report up to a maximum of 5,000 transactions per individual AIFT. If more than 5,000 transactions are involved or have to be reported, additional AIFTs with a maximum of 5,000 transactions each can be recorded and transmitted.
23	**What information must be submitted as attachment?**	Mandatory documents according to Art. 3 MROSO, such as copies of passports and account opening documents, must be submitted as attachments.
24	**In which formats can attachments be submitted?**	The accepted formats are *.zip; *.xml; *.txt; *.tif; *.tiff; *.bmp; *.doc; *.docx; *.pdf; *.jpg; *.xls; *.xlsx; *.ppt; *.pptx; *.png; *.rtf. Users are asked to always use **O**ptical **C**haracter **R**ecognition (**OCR**). The maximum size per attachment is 20 MB.
25	**What does the process for submitting a suspicious activity report via XML file look like?**	Automated report creation requires that the financial intermediary has programmed an internal IT solution (graphical unit interface; GUI) ensuring that the XML file is generated in the structure defined by MROS. The structure of the XML file is published on the MROS website in the document "*Standard XML Reporting - Instructions and Specifications for goAML*":

		https://www.fedpol.admin.ch/fedpol/en/home/kriminalitaet/geldwaescherei/meldung.html. For this purpose, the necessary information must be retrieved from the financial intermediary's internal systems and then compiled in the defined XML structure. The provision of the necessary IT solution is the responsibility of the respective financial intermediary. If the automated reporting process described above is selected for the report creation, a ZIP file containing the XML file itself as well as all the attachments to be submitted (e.g. opening documents, copy of passport, signature card, etc.), can be transmitted instead of the pure XML file.
26	**Is there a minimum number of reports per year at which the implementation of an IT solution for creating an XML file is definitely worthwhile?**	It is not possible to define a minimum number, since this depends not only on the number of reports, but also on how extensive the individual reports are. Theoretically, it could be that a bank submits only one report per year on average, but that it is so extensive that the bank does not want to put in the manual effort and decides to implement an IT solution for creating an XML file. Additional information that must be submitted to MROS under Art. 11a para. 1 and 2 AMLA also requires entry in the system. Transaction details must also be submitted electronically in these cases and not as attachments.
27	**Is the automated creation of an XML file mandatory?**	Automated report generation via XML upload can, but does not necessarily have to be implemented. If the creation of an XML file in automated form is considered, it can be implemented at any time by the respective financial intermediary.
28	**Is there a hybrid between manual recording and the automated creation of reports?**	It is possible to carry out a semi-automated recording of the required data and to integrate the transactions into the suspicious activity report via XML file. Missing data (fields marked in red; e.g. nationality of the contractual partner) can then be added manually, whereby the same information only needs to be added once and not per transaction. This functionality saves time for those financial intermediaries who do not wish to implement the fully automated solution but have a large number of transactions to report and would otherwise have to enter them completely manually. In order to use this option, the transactions from the banking system must be saved in a structured and predefined form as XML file. Under the following link you will find additional information on the topic of transaction upload in the tab *Documents*: https://www.fedpol.admin.ch/fedpol/en/home/kriminalitaet/geldwaescherei/meldung.html
29	**Why does MROS insist on the fully electronic submission of suspect reports?**	The electronic data availability allows MROS to apply extensive analysis options by efficiently and effectively assessing large amounts of data. The data can be linked

		automatically, correlations are recognized faster and may easily be visualized as graphics.
30	**How should I enter IBAN numbers?**	It is preferred that IBAN numbers are entered in one piece, i.e. without spaces. This not only facilitates subsequent searches, but also improves the data quality of the system.
31	**How should I proceed as an account-holding bank if I have to report the termination of a business relationship accordingly to art. 9b AMLA?**	Termination notifications pursuant to art. 9b AMLA can be entered and reported during a transition phase either by means of notification via message board in the goAML web portal or via specific report type (CANCL or CANCT), also available in the goAML web portal under the menu "New reports" (for instructions, see here).
32	**Do I receive a receipt confirmation from MROS after having sent a termination notification accordingly to art. 9b AMLA?**	No, in neither of the two notification options mentioned under point 31 does the reporting financial intermediary receive any acknowledgment receipt from MROS. The transmission data recorded in the goAML web portal (Message Board notification -> see screenshot in the above mentioned instructions file; notification via report CANCL/CANCT -> status "*Processed*") are considered as a proof of a successful transmission to MROS. MROS reserves the right to reject incorrectly or incompletely recorded termination notifications for revision to the financial intermediary.

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