



Fact Sheet goAML



Handout for goAML Web users

This document is intended to provide practical assistance in the recording of reports as well as quick information on new features of goAML Web 5.2 and should be consulted before attempting to create a manual or semi-automated report.

While uploading a complete XML will not be much different than with previous goAML versions, users attempting to enter data manually will see some changes and should take the following info into consideration. Some new functions concern users who normally upload complete XML files as well.

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1. General information

To start the manual recording process, log into the goAML web portal and select the “**Web Reports**” option in the “**New Reports**” menu. All mandatory fields are colored **red** in the web application. In addition, various entries are necessary for the report to be correctly completed and recorded in order to be successfully processed.

<p>Report type</p> <p><i>Invitation: "Select a report type to continue".</i></p> <p><i>The 'T' in the report type (STR/AIFT/CANCT) means 'with transactions'.</i></p>	<p>STR = Report with transactions SAR = Report without transactions</p> <p>Banks generally file an STR unless it is a SAR under Art. 9 para. 1 lit. b AMLA.</p> <p>Insurance companies, asset managers, fiduciaries, credit and leasing companies and casinos shall only file SARs.</p> <p>AIF/AIFT serve to provide further information on a suspicious activity report (SAR or STR) during the 40 days following the date of acknowledgement of receipt of the initial report forwarded to MROS or to comply with a request to disclose information pursuant to Art. 11a AMLA.</p>
<p>Main mask <i>(see also Art. 3 OMLRO)</i></p>	<p>As detailed a description as possible of the business relation(s) and the suspicious facts on which the report is based, including explanations of the clarifications made pursuant to Article 6 AMLA.</p>
<p>Attachments <i>(see also Art. 3 OMLRO)</i></p>	<p>All mandatory enclosures according to Art. 3 OMLRO in PDF (with automated text recognition OCR). The attachments are to be labeled comprehensibly according to the content of the document (not attachment 1, attachment 2, etc.; e.g., 1. opening documents business relation X; 2. account statement account XY May 20-June 21; 3. press articles, etc.).</p> <p>The maximum size of the entire report is 300 MB and 20 MB per attachment.</p>
<p>Type of report / suspected predicate offense / factor(s) arousing suspicion / type of attachment</p> <p>= <i>Indicators</i></p>	<p>It is mandatory to select the following indicators from the list by clicking to the left of the code:</p> <ul style="list-style-type: none"> • Reporting type (only one may be selected), e.g., Art. 9 para. 1 lit. a AMLA or Art. 305^{ter} para. 2 PC; codes with 'M'. • At least one suspected predicate offense; codes with 'V'; if none known = "Not classifiable" (code 1131V). • At least one factor arousing suspicion (reason); codes with 'G'. • The attachments; codes with 'B'. <p>If a report does not contain a report type (code 'M'), at least one predicate offense (code 'V') and at least one reason (code 'G'), the report will be rejected by MROS.</p> <p>Selection at AIF/AIFT:</p> <ul style="list-style-type: none"> • AIF/AIFT with additional information on a report still pending with MROS = same indicators as the original SAR/STR. • AIF/AIFT in response to a request under Art. 11a AMLA = for each mandatory code (M, V and G), the option "Art. 11a para. 1 and 3



	<p>AMLA" or "Art. 11a para. 2 and 3 AMLA" must be selected (e.g. for reporting type codes 0009M and 0010M respectively).</p> <p>In the selection under factor(s) arousing suspicion (reason), there is the code 2015G "MROS-Info (Art. 11a para. 2 AMLA)". This option is for reports that have a request according to Art. 11a para. 2 AMLA as a factor arousing suspicion and should not be used for responses to requests according to Art. 11a para. 1 AMLA.</p> <p>Indicators which lead to a reject in case of incorrect entry/missing:</p> <ul style="list-style-type: none"> • For reports which have as a factor arousing suspicion (reason) an order for production of documents from a public prosecutor's office, the code 2011G "Information from prosecution authorities" must be selected. • If negotiations to establish a business relation are broken off, it is mandatory to select the reporting type code 0003M "Art. 9 para. 1 lit. b AMLA".
<p>Transactions (for STR/AIFT/CANCT)</p>	<p> Suspicious transactions are recorded as BiParty transactions</p> <p>Important notes on transactions:</p> <ul style="list-style-type: none"> • Each transaction is recorded in the direction of the asset flow ("From" / "To counterparty") • For at least one party ("From" or "To counterparty") the option with the addition 'Reported subject' must be selected • Electronic funds transfers are always to be recorded from account to account (with at least one 'Reported subject') • Cash transactions (counter (Cash) / ATM) always have an account and a person as party. Example: Cash payment at the counter or cash withdrawal at the ATM -> From 'Account (Reported subject)' / To 'Person' • A maximum of 100 transactions are to be entered in one STR • Up to a maximum of 5,000 transactions can be filed by means of an AIFT. If more than 5,000 transactions are involved, several AIFTs with a maximum of 5,000 each can be compiled and transmitted. <p>Important notes on the 'Reported subject' accounts:</p> <ul style="list-style-type: none"> • In the 'Exchange rate' field, the number '1' must always and exclusively be entered • In the case of an active account, the 'Account balance in CHF' must always be entered as of the reporting date. If the account is a foreign currency account, the 'Account balance in foreign currency' must also be entered. • For an active account, the 'Account balance as of' field must be recorded (this should be as close as possible to the reporting date and correspond to the balance sheet (PDF) in the attachment)



	<ul style="list-style-type: none">• In case of a closed account, leave the fields 'Account balance' empty, please also do not enter a '0'.• In case of a closed account, it is mandatory to record the closed date• For each registered account, the respective legal entities or natural persons must be added by means of the symbol '+'.• For accounts of a reported business relation without suspicious transactions, we refer to the explanations on MultiParty functionality <p>Important notes about the accounts (those of the third party institution):</p> <ul style="list-style-type: none">• Preferably the IBAN or the account number (whichever is available) must be entered in the field "account number"• The BIC/SWIFT must be filled in correctly, this is essential information needed to merge info with data already existing in goAML. If not available, the BIC/SWIFT can be determined by means of the IBAN number for example via https://www.iban-rechner.de/iban_validieren.html <p>Important information on the registration of legal entities and natural persons</p> <ul style="list-style-type: none">• The option 'Entity as contracting party' is only selected if the contracting party (or the counterparty according to the transfer information) is a legal entity. If the option was clicked by mistake, the tab can be deleted again using the trash can icon in the upper right corner.• The correct role of the natural person in the field "related persons" must be selected, combinations must be observed• The correct format for entering the date of birth depending on the language option in goAML must be taken into account (German: dd.MM.yyyy; English: M.d.yyyy) <p> Using the MultiParty functionality</p> <p>This is not an actual transaction, but is used exclusively to record additional elements such as:</p> <ul style="list-style-type: none">• Active accounts (Reported subject) of the reported business relation(s) for which no suspicious transaction has been recorded.• Relevant closed accounts of the reported business relation(s) for which no BiParty transaction was recorded• Materially relevant natural persons and/or legal entities (at least all persons/entities according to the text in the main screen must be entered), which have not already been entered in connection with the entry of a BiParty transaction. <p>Further to note:</p> <ul style="list-style-type: none">• (Fictitious) transaction number can be generated automatically in goAML by clicking on the gear wheel icon
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	<ul style="list-style-type: none"> • The amount of a MultiParty transaction is always CHF 0.00 (field must not be left empty) • Under transaction type 'MULTIPARTY Dummy' is to be selected • Use the date of the report as transaction date • The value "n/a" can be entered in the 'Reason for payment' field
<p>Activity (for SAR/AIF/CANCL)</p>	<p>Basically, all accounts of a reported business relation are to be recorded. Likewise, all relevant natural persons / legal entities are to be recorded.</p> <p>It is recommended to start with the registration of accounts, because in this context, contracting parties/beneficial owners/authorized signatories will be registered at the same time.</p> <p>Detailed information on the registration of accounts is specified in the upper part 'Transactions' under 'Important notes on the 'Reported subject' accounts:'.</p> <p>Central to the entry of persons is the 'Role' field, in which the appropriate number must be entered:</p>
<p>More tips and information</p>	<p>Most fields have a 'tooltip'. If the cursor is moved over the title of the respective field, further explanations appear.</p> <p>As soon as the 'Other' option is selected in a field, the 'Remarks' (or additional information) field must always be filled in. Otherwise, the report will be rejected. Examples: Address, Identification, Role, etc.</p> <p>The option 'Goods and services' is intended for merchants and is not to be used by financial intermediaries.</p> <p>As soon as all necessary mandatory fields of the report have been filled in, the vertical bars on the left of the main menu appear green and the report can be submitted. Not all mandatory entries listed in this document are immediately checked by the system. Thus, the entire report can be shown green in the web form and still be rejected by MROS.</p>
<p>Procedure after a rejection of the report (Reject)</p>	<p>A notification to the stored email address is triggered with the information that a message has been received in goAML. In the message board there is a message with the title 'Report rejected'. The reason for the rejection is explained in the document.</p> <p>In order not to have to enter a whole new report, the following procedure can be followed:</p> <ul style="list-style-type: none"> • Under 'Submitted reports' in the 'Status' column, click on the blue underlined word 'Rejected'. • The reasons for the technical rejection are listed, in case of questions the indicated phone number can be called • Then click on 'Revert'. • The report changes status and can be edited again under 'Drafted reports' by clicking the pencil icon and making the necessary corrections • Subsequently save and submit the report to MROS again



2. Switch Delegation

goAML users of Reporting entities that are authorized to report for more than one financial intermediary (delegate functionality), can now switch between the financial intermediaries that they are authorized for while being logged in, simply by clicking on the “**Switch delegation**” button. This will open a new screen where one can see the different reporting entities for which authorization exists:

Change the Reporting Entity for this Session

You are currently reporting as: Mein Sparschwein AG

Mein Kreditschwein AG

Change

Close

3. XML-Upload

Dragging&dropping of files is now possible (red option) in addition to selecting files the classic way (green option).

NEW REPORTS ▾ DRAFTED REPORTS SUBMITTED REPORTS ▾ MY GOAML ▾ STATISTICS ADMIN ▾ HELP

XML Upload

Select files...

Drag and drop an XML Report or ZIP file here.

Maximum file size: 292969 KB
Allowed file types: .xml .zip

Simply open your local folder, where the XML and the attachments are stored and “**drag&drop**” them into the designated field.



4. Load XML into Web form to make changes

If a submitted report is rejected by MROS, it can now be edited manually, even if it was not entered in manual or semi-automatic mode but was generated automatically in advance. This user-friendly function enables compliance officers to process and correct incomplete or incorrect data records more easily and efficiently.

A previously automatically generated XML file can now be uploaded via the menu option **New report → Web reports** as well. By means of this new option, the data records contained in the file can then be added and edited directly in the entry mask before the report is transmitted via the "Send" button.

Step 1: Select **New Report → Web reports** and upload your XML file in "**Create new report from XML file**" section (either via "**Select file**" button or directly via "**drag & drop**" function):

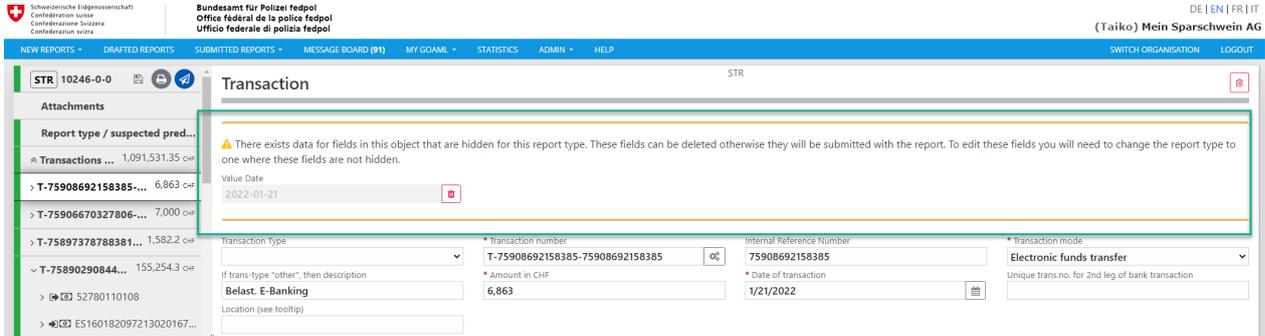
The screenshot shows the MROS web interface. At the top, there are navigation tabs: NEW REPORTS, DRAFTED REPORTS, SUBMITTED REPORTS, MESSAGE BOARD (93), MY GOAML, STATISTICS, ADMIN, and HELP. A dropdown menu is open under 'NEW REPORTS', showing options: XML Upload, Web Reports, and XML Report Validator. A green arrow points to 'Web Reports'. Below this, the 'New Report' form is visible. It has a dropdown menu and a 'Create Report' button. Below the form, there is a section titled 'Create new report from XML' with a 'Select files...' button and a 'drop files here to upload' area. A green arrow points to this section.

Step 2: If a conversion hint like the one seen below appears, override it by clicking "Continue"

The screenshot shows the 'New Report' form with an error message overlay. The error message is: "The uploaded XML is incomplete or invalid." Below this, it says: "The following deprecated elements have been automatically migrated to the latest standard: submission_date, email, signatory - Please check the imported data carefully and consider upgrading your transaction templates." The error details are: "cvc-complex-type.2.4.a: Invalid content was found starting with element 'emails'. One of '{addresses, email, occupation, employer_name, employer_address_id, employer_phone_id, identification, deceased, date_deceased, tax_number, tax_reg_number, source_of_wealth, comments}' is expected." At the bottom of the error message, there are 'Cancel' and 'Continue' buttons. A green arrow points to the 'Continue' button. Below the error message, there is a 'Select files...' button and a 'Done' button. At the bottom, there is a file upload status: "Sparschwein_SAR_Test.xml File successfully uploaded."

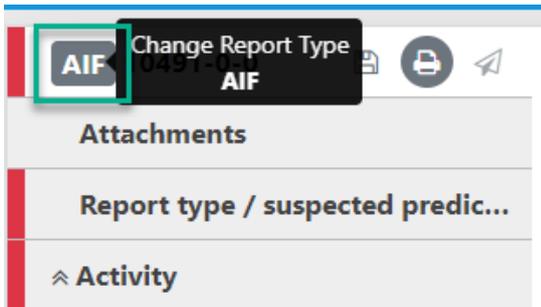


Step 3: Add or correct the desired data records directly in the data entry screen of the report, then save and submit the report by clicking on the icon shown in the green box . Please note that altering information that was based on the old schema in the Web Form, will automatically transform into goAML 5 schema-data.

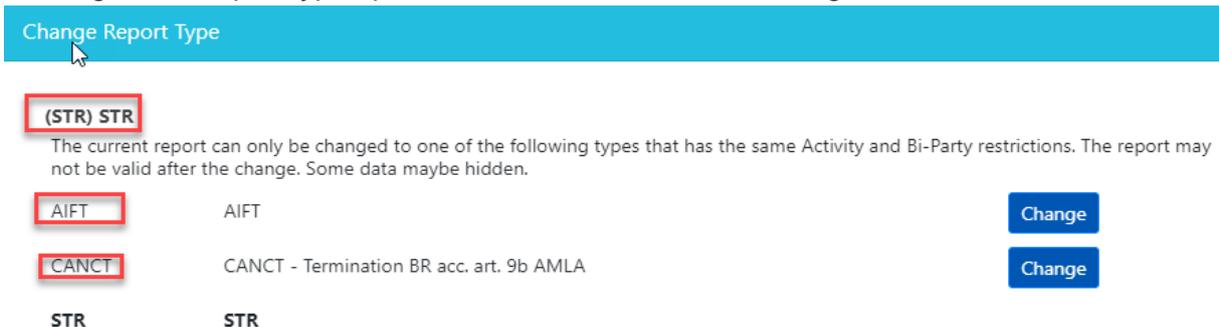


5. Switch report type

In the past, it often happened that a financial intermediary selected a wrong report type and as a consequence, had to re-enter all data as it was not possible to change the report type in a simple way. With goAML 5, there is now the option to change the report type within the same report category. Thus, an STR can be converted to an AIFT or CANCT, and a SAR can be converted to AIF or CANCL (or vice versa). To do this, the mouse pointer is moved over the report type. This option is not only available for new reports, but also available for reports that MROS had to reject for reason of wrong report type and that were reverted in the process.



Clicking on the report type opens as new mask where the change can be made:





Change Report Type

(AIF) AIF

The current report can only be changed to one of the following types that has the same Activity and Bi-Party restrictions. The report may not be valid after the change. Some data maybe hidden.

AIF

AIF

CANCL

CANCL- Termination BR acc. art. 9b AMLA

Change

SAR

SAR

Change

6. Asserts / Assertions

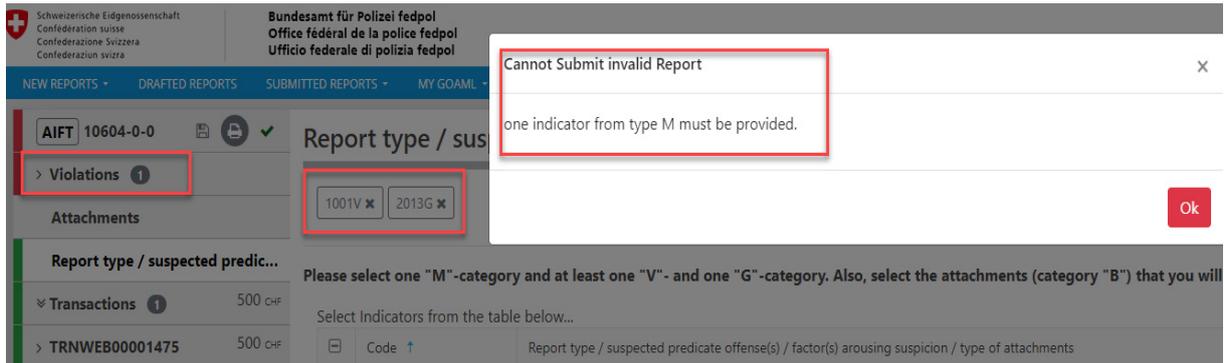
The new version of the goAML XSD (the backbone of goAML) allows to make new in-depth controls of the report resp. the XML file with "asserts" and "assertions". This means additional automatic controls and more help for financial intermediaries when uploading XML files and when entering data in the goAML web forms. An XML file or a manual entered report that does not meet an automatic check cannot be submitted to MROS. The following new controls were added in the XSD:

- If a value is recorded in the field "Balance", "Date of Balance" must be entered as well, and vice versa
- One Indicator M and at least one Indicator V and G must be entered
- Indicator 0003M must be applied only for SAR
- The field "fiu_ref_number" must be completed for CANCL and CANCT reports
- Verification of correct indicators for CANCT/CANCL reports
- One of each transmode_code and transaction_type_code must be completed
- Indicator "0003M" can only be used in connection to a report of type SAR

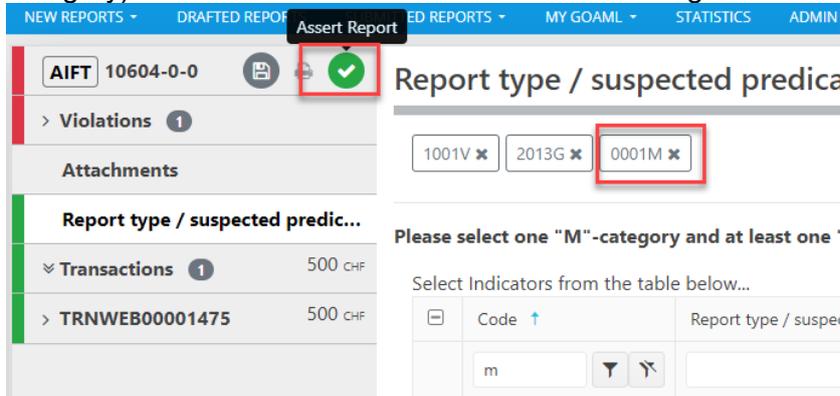
7. Example for assertions for indicators in Web Form

In the current version of goAML, so-called rejection rules control if a financial intermediary selects the proper indicators which must consist of one "M"-category and at least one "V"- and one "G"-category. Even without following these rules, it was possible to transmit the report to MROS, only to have the report rejected by latter for an incorrect indicator selection.

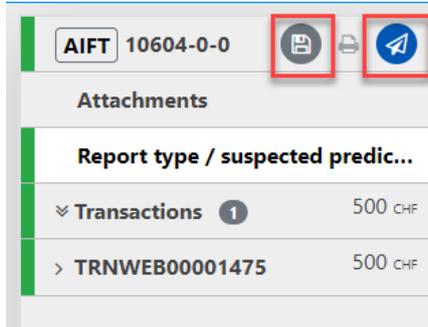
As stated above in point 5, with goAML 5, the XSD schema was amended with certain asserts and assertions, controlling the proper selection of indicators even before the report is sent off. In the following example only a "V"- and "G"-category was selected, missing the mandatory "M"-category. Although the report is ready to be sent off (the report is all green), the click on the "Send" icon  will throw an error like in the sample below and add a "violation" to the report, making the report partially "red":



This means that the report must be corrected before it can be sent. To do so, after clicking the red “ok” on the error message, one must add the missing indicator (in the example the “M”-category) and validate the correct selection with the green checkmark:



Once the validation has worked and the report is “green” again, it can be saved and sent off:



8. Example for assertions for indicators via XML file upload

In goAML 5, when an XML file is uploaded via *New Report* → *XML Upload* and sent off, during the upload process, goAML checks if the XML is valid against the asserts and assertions: if for example the indicator “M” is missing in the XML file, the report will get the status “*Failed Validation*”:

File Name	Last Updated By	Entity Name	Transactions	Entity Ref	No. Rejected	Status	Submitted On
_Web_Report_ReportID_1060...	solti711	Financial Intelligence Unit (FI...	1	fjdffhjh		F - Failed Validation	6/22/2023

By clicking on the blue hyperlink “Failed Validation”, a new window opens with the detail of the error as in the example below:



Report ID: 10609-0-0 X

Error #: 1 Location: Line 143, Position 23
Description: cvc-assertion-failure-mesg: Assertion failed for schema type '#AnonType_report_indicatorsreport'. one indicator from type M must be provided.

If this is the case, the faulty XML can firstly be uploaded into the goAML Web forms (see point 3) and corrected, before being saved and sent off again.

9. Categorization of Indicators

A new option exists in the section “**Report type / suspected predicate offense(s) / factor(s) arousing suspicion / type of attachments**” It is now possible to filter indicators based on their categories:

Please select one "M"-category and at least one "V"- and one "G"-category. Also, select the attachments (category "B") that you will upload.

Select indicators from the table below...

Code	Report type / suspected predicate offense(s) / factor(s) arousing suspicion / type of attachments	Categories
<input checked="" type="checkbox"/> 0001M	Art. 305ter para. 2 SCC	Type of report
<input type="checkbox"/> 0002M	Art. 9 para. 1 letter a AMLA	Suspected predicate offense
<input type="checkbox"/> 0003M	Art. 9 para. 1 let. b AMLA	Factors arousing suspicion
<input type="checkbox"/> 0004M	Art. 9 para. 1 letter c AMLA	Attachments
<input type="checkbox"/> 0005M	Art. 16 para. 1 letter a AMLA	Type of report
<input type="checkbox"/> 0006M	Art. 27 AMLA	Type of report
<input type="checkbox"/> 0007M	Art. 7 FIAA	Type of report
<input type="checkbox"/> 0008M	Art. 9 para. 1bis AMLA (merchants)	Type of report
<input type="checkbox"/> 0009M	Art. 11a para. 1 and 3 AMLA	Type of report

The following categories exist:

- Type of report
- Suspected predicate offense
- Factors arousing suspicion
- Attachments

For certain report types (AIF/AIFT; CANCL/CANCT), the number of indicators shown will be reduced to the absolute minimum. These options will make entering reports much faster.

10. New section in person mask: 'PEPs' with corresponding fields

If a subject mentioned in a report is also a politically exposed person (PEP), this information previously had to be filled in the fields '**PEP: office held / term of office**' and '**PEP: in which country?**' (the technical name of these fields are: '**passport_number**' and '**passport_country**'). With goAML version 5, dedicated fields are now available for this in a separate selection node called '**PEPs**' in the person mask. In addition to the country concerned, the function designation (e.g., member of the Parliament) and details of the office held (e.g., member of the National Council) must be entered in two distinct fields. Any remarks (optional) can be placed in in a further field called "**PEP-comments**".



The new PEP node in the web portal looks like this (all three marked fields are mandatory), **“term of office”** is optional (but highly desired):

11. New designation: **“Related persons”** instead of previously **“Contracting party / Beneficial owner(s) / Power of attorney/Signator(ies)”** for the reported 'Account (reported subject)'.

The previous designation of the section **“Contracting party / Beneficial owner(s) / Power of attorney/Signator(ies)”** in the section 'Account (reported subject)', which is mandatory for reported accounts, is now called **“Related Persons”**. The type of the relationship can be specified as usual by means of the **'Role'** field.

12. Reported subject (**“My Client”**) also possible in SAR/AIF/CANCL

Until now, it was not possible to distinguish between "reported subject" and "counterparty" in a SAR (or AIF/CANCL). This repeatedly led to rejections by MROS, because certain fields are mandatory for reported subjects, but could not be displayed as such in the mask. With goAML 5, a clear distinction is now made between the reported subject and the counterparty. The financial intermediaries are advised to use the corresponding new mask for the reported parties:

With this change a new field **“Role”** is introduced, just as in report types STR/CANCT/AIFT. The old field **“significance”** is no longer mandatory:



13. Entity-to-entity relationship (legal person to legal person) can now be mapped correctly

Up to now, it was only possible to enter a legal entity as a contracting party in the “**Entity as contracting party**” selection node provided for this purpose. If several legal entities have a role in the reported account (entity-to-entity relationship), the input mask “**Natural person**” had to be used as a so-called workaround for the entry of an additional account-related involved legal entity. This workaround is now obsolete, since the nodes “**Account**” or “**Account (reported subject)**” offer a new option called “**Other Related Entities**”.

- + Entity as contracting party
- + Account Funds
- + Other Related Entities
- + Related Persons

The same logic applies in this new node as in the node “**Entity as contracting party**”. Additionally, you have to select a role that describes the relation between the entity and the account.

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