



PARQUET GÉNÉRAL
DU GRAND-DUCHÉ DE LUXEMBOURG
CRF - Cellule de renseignement financier

goAML : guidance for the investment sector

Online training
29 April 2021

Agenda

- ❑ Registration in goAML
- ❑ Delegations
- ❑ Report forms (SAR/STR)
- ❑ Q&A

goAML at the CRF

- live since 1 January 2017
- over 4 000 registered reporting entities
- +/- 200 SAR/STRs per business day

goAML

GoAML is developed by United Nations Office on Drugs and Crime



**United
Nations**

Office on Drugs and Crime

Topics ▾

What we do ▾

Information For ▾

About us ▾

Field Offices ▾

Quick Links ▾

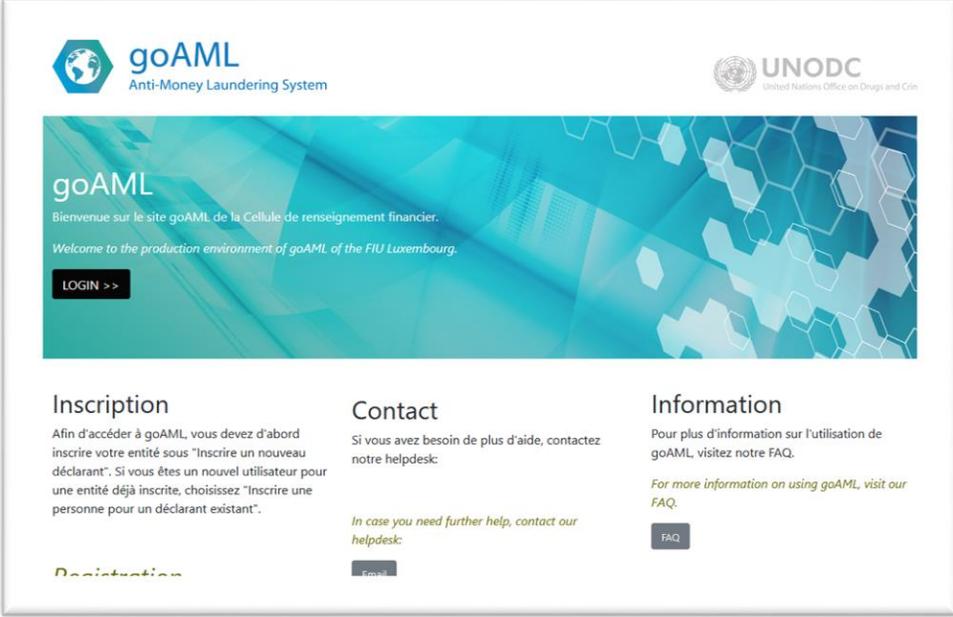
goAML (Anti-Money-Laundering System)

<http://goaml.unodc.org>



2 environments for external users

<https://goaml.b2g.etat.lu/>



The screenshot shows the goAML production environment homepage. At the top left is the goAML logo (Anti-Money Laundering System) and at the top right is the UNODC logo (United Nations Office on Drugs and Crime). The main banner features a blue geometric pattern with the text "goAML" and "Bienvenue sur le site goAML de la Cellule de renseignement financier. Welcome to the production environment of goAML of the FIU Luxembourg." Below the banner is a "LOGIN >>" button. The page is divided into three columns: "Inscription" (Registration), "Contact", and "Information".

Inscription
Afin d'accéder à goAML, vous devez d'abord inscrire votre entité sous "Inscrire un nouveau déclarant". Si vous êtes un nouvel utilisateur pour une entité déjà inscrite, choisissez "Inscrire une personne pour un déclarant existant".

Contact
Si vous avez besoin de plus d'aide, contactez notre helpdesk:
In case you need further help, contact our helpdesk:

Information
Pour plus d'information sur l'utilisation de goAML, visitez notre FAQ.
For more information on using goAML, visit our FAQ.



The screenshot shows the goAML training environment homepage. It features the same goAML and UNODC logos at the top. The main banner shows a photograph of a building with the text "goAML" and "Bienvenue sur le site goAML de la Cellule de renseignement financier. Welcome to the training environment of goAML of the FIU Luxembourg." Below the banner is a "LOGIN >>" button. The page is divided into three columns: "Inscription", "Information", and "Contact".

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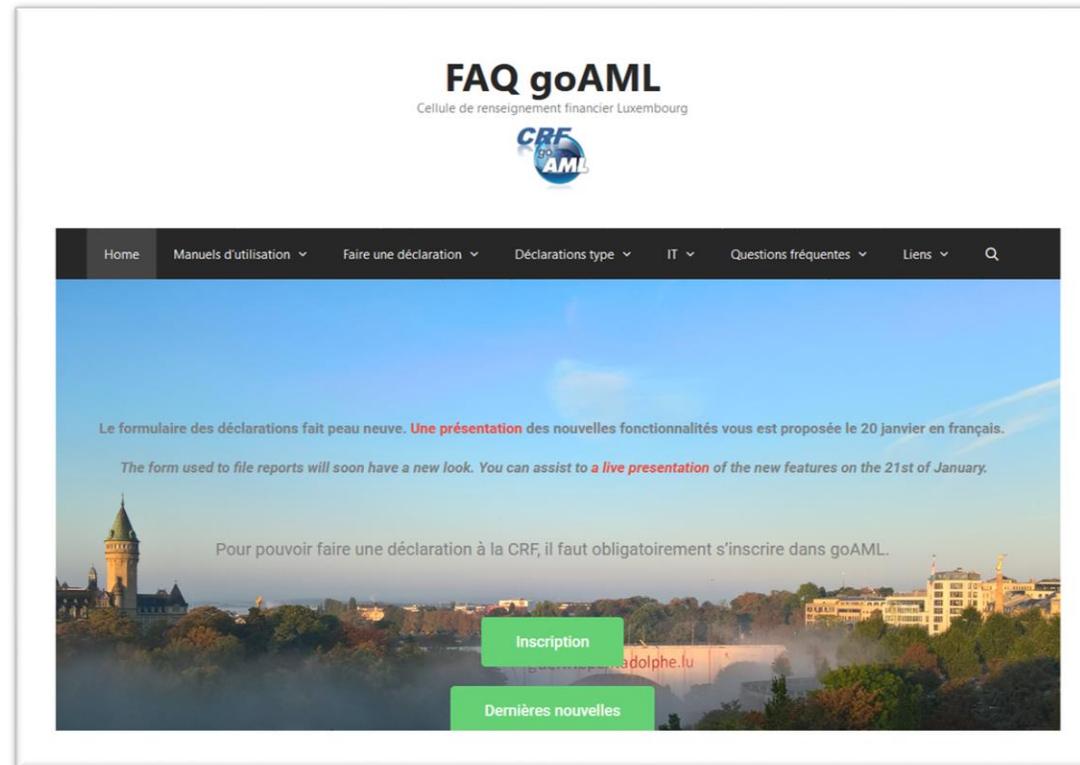
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<https://goaml-training.b2g.etat.lu/>

goAML - FAQ

- <https://faq.goaml.lu/>



FAQ – dedicated website

<https://faq.goaml.lu/>



The screenshot shows the goAML website interface. At the top is a dark navigation bar with links: Home, Manuels d'utilisation, Faire une déclaration, Déclarations type, IT, and Questions. The main content area has a heading 'Partie générale d'une transaction' with 'Partie générale' highlighted in yellow. Below the heading, a paragraph states: 'La rubrique « Transactions » des types de déclarations avec transactions comporte:'. This is followed by a bulleted list: '• une partie générale', '• une partie définissant les « Fonds en provenance de »', and '• une partie définissant les « Fonds à destination de »'. A subsequent paragraph says: 'Ces trois parties doivent être remplies pour qu'une transaction soit valable.' Below that, a note reads: 'NB: Vous pouvez renseigner autant de transactions que nécessaires.' At the bottom, a screenshot of the 'Transaction' form is shown, with several fields highlighted in red, including 'Référence de la transaction et obligation', 'Montant en EUR et obligation', 'Date de la transaction et obligation', 'Date valeur affaiblie', and 'Date valeur'. The form also includes fields for 'Numéro de référence interne', 'Date de la transaction et obligation', 'Indication sur le statut', 'Date valeur', 'Date valeur', 'Indication physique', and 'Description'.

1) Registration

Registration Type

Please select the type of organization you are registering as, and then enter your organization details

Entity type:

Reporting Entity

Stakeholder

Supervisory Body

Registering Organization

Organization Business Type*

Click on the appropriate “Organization Business Type” in drop down list (f.ex.)

- Alternative investment fund manager
- Registrar agents
- Person carrying out a professional activity mentioned in annex I of the law (as per, article 2(I)7 + article 1(I)(3bis) of the 2004 AMLCFT law)

Exceptionnally only: other person referred to in the law or person not referred to in the law

Assessment of contractual situation by legal team/lawyer of reporting entity!

Fill in the rest, as applicable.

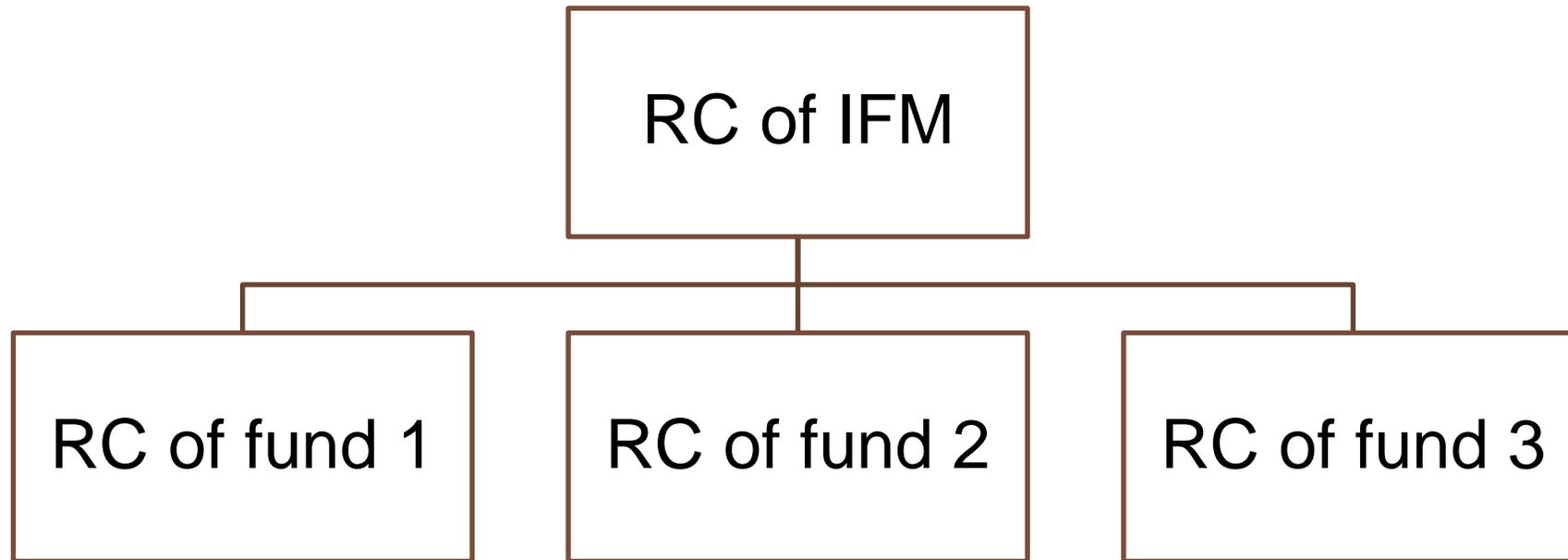
2) Delegations

- ❑ GoAML sign-in requires Lux trust token
- ❑ However, LuxTrust token = nominative, i.e. 1 token for 1 person
- ❑ Consequence : 1 LuxTrust token for each registered reporting entity

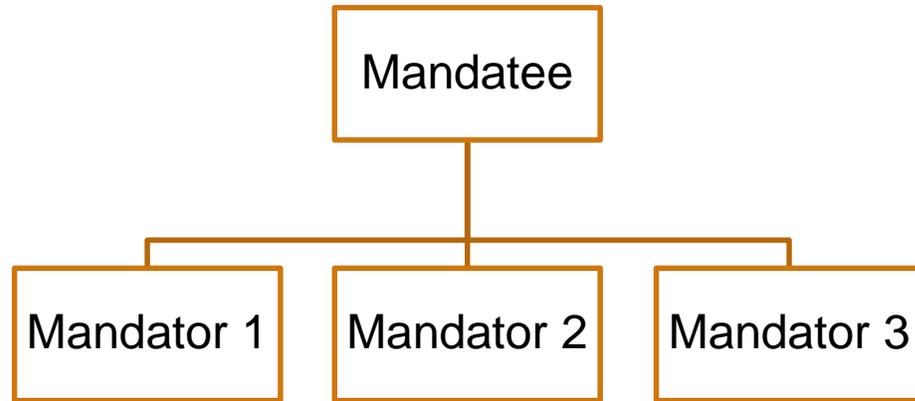
- ❑ To avoid logistic headache, CRF allows for delegations
- ❑ Use of same single token for reports filed in name and on behalf of others
- ❑ Beware : Technical feature (IT)
- ❑ Applicable legal regime: **MANDATE**, i.e. in the name and on behalf of another reporting entity



2) Delegations: structure in practice



2) Delegations: in goAML environment



- RC of the IFM registers as reporting entity (Mandatee) in goAML
- after validation by the CRF
- RC of IFM registers the funds he/she manages as reporting entities (mandators), in the name and on behalf of which, he/she will file reports with the CRF

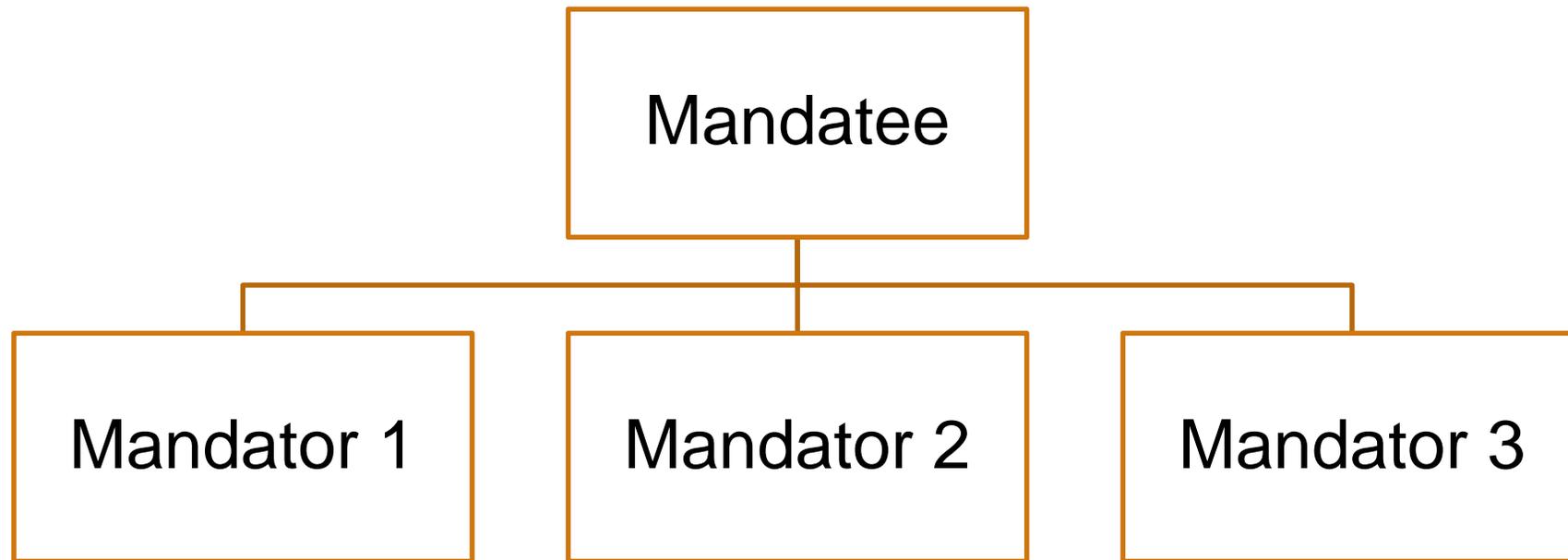
2) Delegations

For more detailed information on RCs and IFMs, please check the following external links :

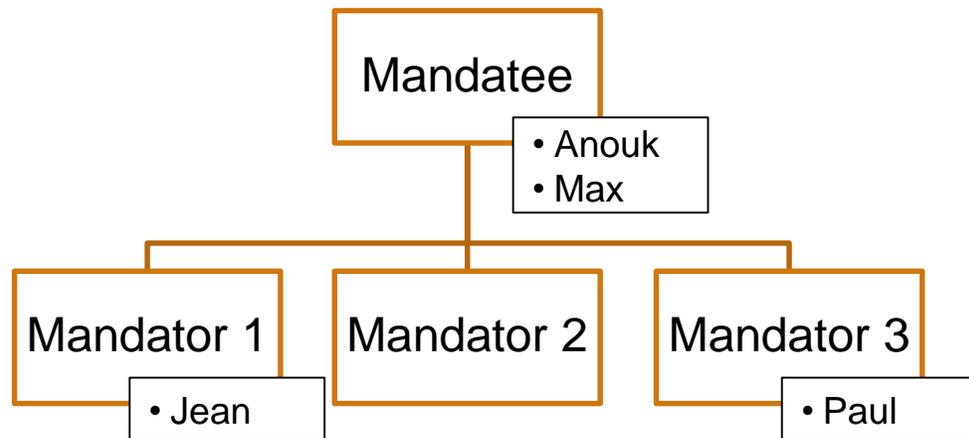
[http://www.cssf.lu/fileadmin/files/Publications/Communiques/Communiques_2019/OPC AML Conference 3 December 2019 051219.pdf](http://www.cssf.lu/fileadmin/files/Publications/Communiques/Communiques_2019/OPC_AML_Conference_3_December_2019_051219.pdf)

[http://www.cssf.lu/fileadmin/files/Metier OPC/FAQ/FAQ Persons involved in AML CFT f or a Luxembourg Investment Fund or Investment Fund Manager 251119.pdf](http://www.cssf.lu/fileadmin/files/Metier OPC/FAQ/FAQ_Persons_involved_in_AML_CFT_f or_a_Luxembourg_Investment_Fund_or_Investment_Fund_Manager_251119.pdf)

2) Delegations: legal structure in goAML environment

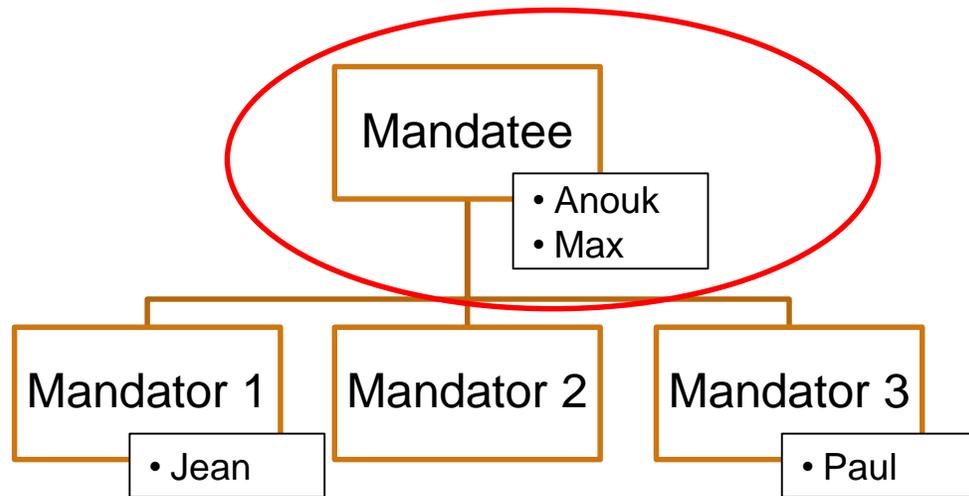


2) Delegations: in goAML environment



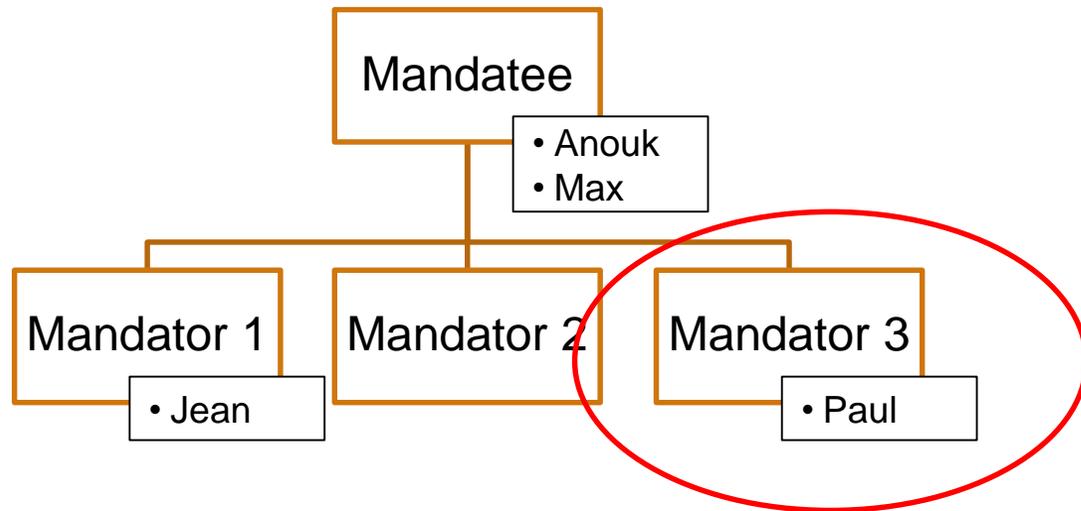
User rights !

2) Delegations: in goAML environment



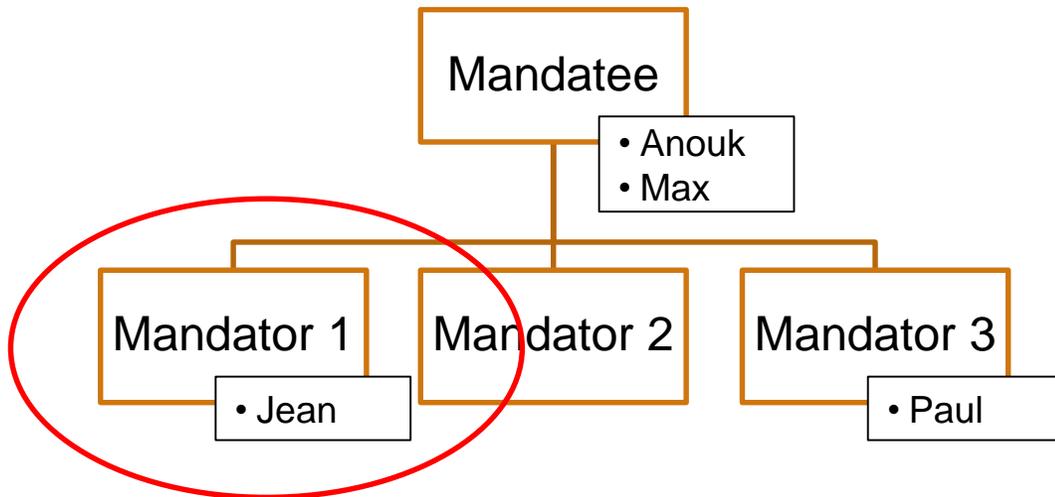
Users with access to “Mandatee” (Anouk and Max) automatically have access to “Mandator 1”, “Mandator 2” and “Mandator 3”.

2) Delegations: in goAML environment



Users with access to “Mandator 3” (Paul) only have access to “Mandator 3”.

2) Delegations: in goAML environment



Users with access to “Mandator 1” (Jean) only have access to “Mandator 1”.

2) Delegations : user rights create risks

Warning :

The goAML user acting as Mandatee, in the name and on behalf of his/her Mandator(s) has 2 risk exposures :

- 1) conflict of interest
- 2) breach of non tipping-off obligation of article 5 (5) of the Law of 12 November 2004 on the fight against money laundering and terrorist financing

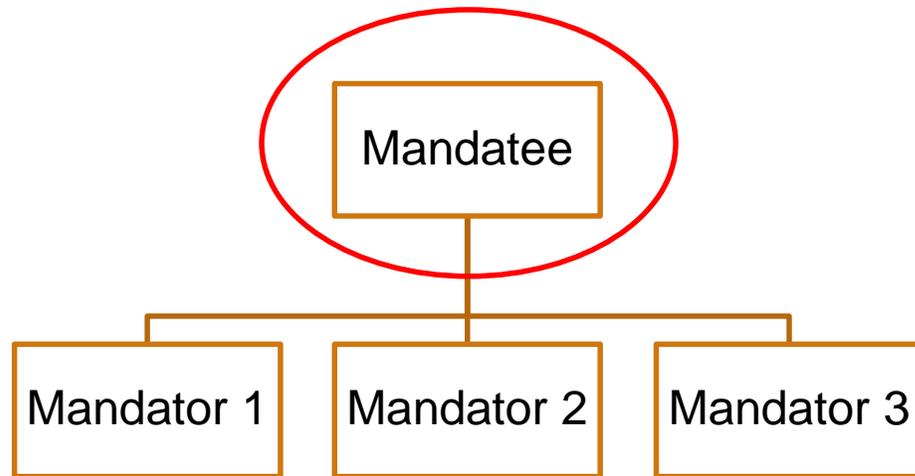
If, from a contractuel point of view, the Mandatee amounts to :

- the “client” which the report is about, or
- a third party vis-à-vis the Mandator.

The CRF validates delegations (from a technical point of view).

In turn, the Mandatee and his/her Mandators must assess these risks, based on their legal and factual merits, and bear the entire responsibility thereof.

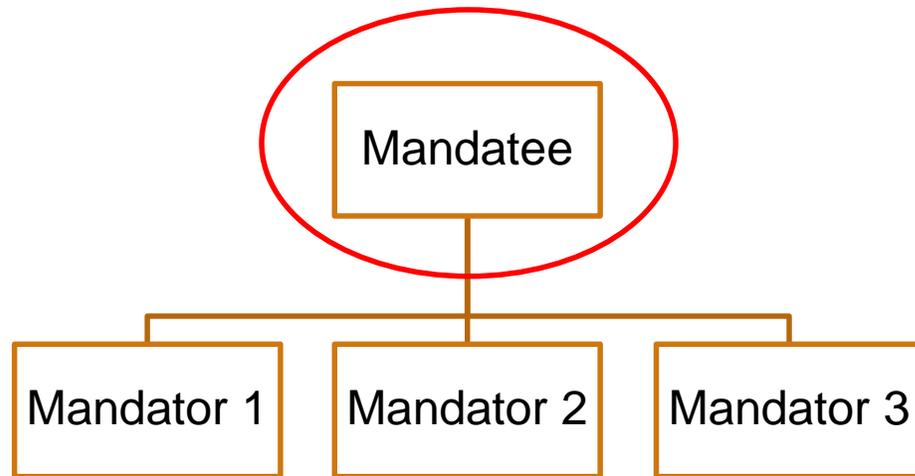
2) Delegations: creation



1st step :

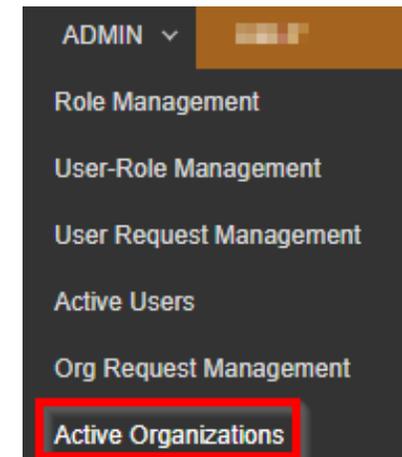
- Registration in goAML of the Mandatee

2) Delegations: creation



2nd step :

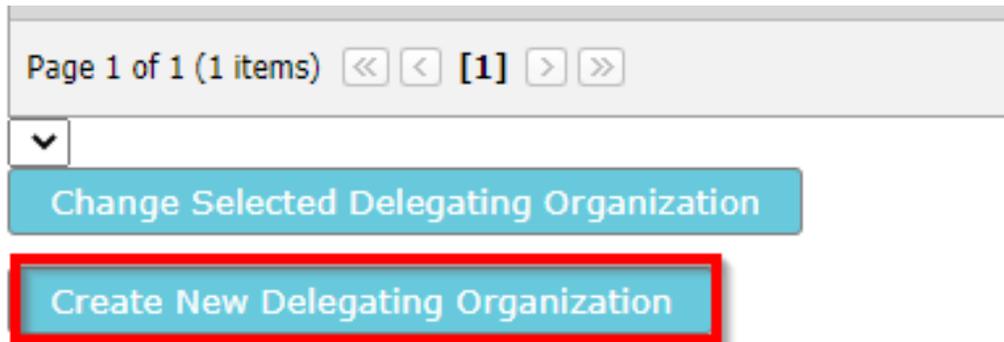
- click on “Active organizations” in the Admin tab



2) Delegations: creation

3rd step :

- At the bottom of this page, on the left, click on “Create New Delegating Organization”



CRF must then validate the registration of this delegation.

2) Delegations

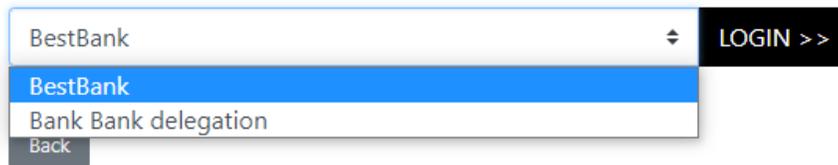
Warning :

This validation by the CRF is of a purely technical nature and does not release the “Mandatee”, nor his/her “Mandators” from their obligation to assess the risks described above.

2) Delegations

- When filing a report, you must choose in which capacity you are acting.

Select a reporting entity for this session.



A screenshot of a web interface showing a dropdown menu for selecting a reporting entity. The dropdown is currently open, displaying three options: "BestBank", "Bank Bank delegation", and "Back". The "BestBank" option is highlighted in blue. To the right of the dropdown is a black button with white text that says "LOGIN >>".

- To modify data regarding the Mandatee, click on “Change Selected Delegating Organization”



A screenshot of a web interface showing a page navigation bar and an action button. The navigation bar includes the text "Page 1 of 1 (2 items)" followed by navigation icons: a double left arrow, a single left arrow, the number "1" in brackets, a single right arrow, and a double right arrow. Below the navigation bar is a dropdown menu with the text "Bank Bank delegation" and a downward arrow. Below the dropdown menu is a blue button with white text that says "Change Selected Delegating Organization". The button is highlighted with a red border.

2) Delegations : further help in CRF FAQ goAML website

<https://faq.goaml.lu/manuels-dutilisation/menu-administration/decl-actifs-delegations/?hilitte=%27d%C3%A9l%C3%A9gation%27>

<https://faq.goaml.lu/manuels-dutilisation/menu-administration/decl-actifs-delegations/explication-de-la-fonction-delegation/?hilitte=%27d%C3%A9l%C3%A9gation%27>

<https://faq.goaml.lu/manuels-dutilisation/menu-administration/decl-actifs-delegations/delegations-fonds-dinvestissement/?hilitte=%27d%C3%A9l%C3%A9gation%27>

3) Report form : structured data

- FATF requires CRF to perform 2 types of analysis :
 - operational (SAR/STR); and
 - strategic (trends, typologies, risks etc)
- SARs for suspicious activity
- STRs for suspicious transaction
- Attachments = unstructured data
- SAR/STR form = structured data fields
- The more data is structured, the better analysis can be done

3) SAR Form

There are 3 types of “report parties” to choose from :

- ❖ Account
- ❖ Person
- ❖ Entity

Report Parties

  Account	  Person	  Entity
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3) SAR Form

In case of a screening hit/match on a name, click on “Person” or “Entity” for providing data in relation to the suspect name

Report Parties



The screenshot shows a horizontal bar with three buttons. Each button contains a green plus sign, a small icon, and a text label. From left to right, the buttons are: a plus sign, a camera icon, and the text 'Account'; a plus sign, a person icon, and the text 'Person'; and a plus sign, a document icon, and the text 'Entity'. Two red arrows originate from above the bar: one points to the 'Person' button and the other points to the 'Entity' button.

3) SAR Form

For a suspect “Person”, please add :

- First name
- Last name
- Nationality

For a suspect “Entity”, please add :

- Name
- Incorporation Legal Form
- Incorporation Country Code

Of course, any additional information is useful.

3) SAR Form

For a suspect (or not suspect) “Account”, please add :

- Account number
- Account holder name
- Institution name
- Swift OR institution code

Of course, any additional information is useful.

3) STR Form : how to fill in ?

- Transactions in goAML : BiParty



- Every financial flow must be reported from « origin » to « destination »

- FROM – TO

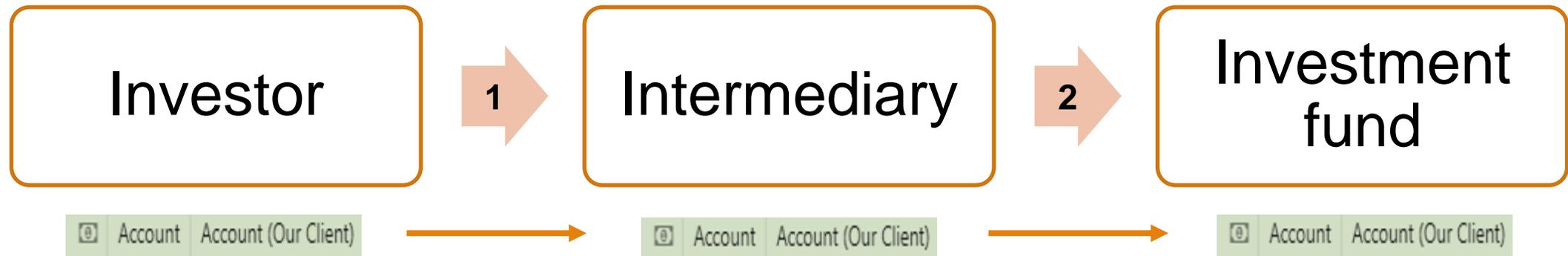
3) STR Form : for investments funds

Subscription:



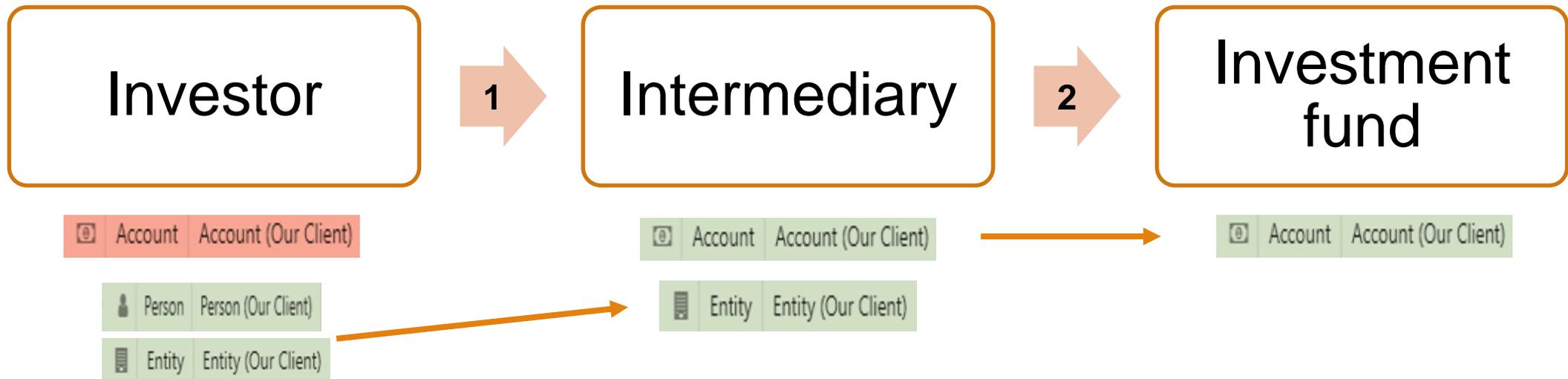
3) STR Form : ideally

Subscription:



3) STR Form : in practice

Subscription:



3) STR Form

Redemption :



3) STR Form

To add a transaction, click on



General part of a « transaction », always fill in :

- Unique Number (can be automatically generated by goAML) ;
- Status of the transaction (drop down list; choice between announced, cancelled by client, executed, pending, refused) ; and
- Amount (always in EUR).

3) STR Form

Not many fields are mandatory for filing a valid STR (in red).

However, in terms of analysis and statistics, any data you hold is important.

Therefore, the data we ask for hereafter is mandatory for the CRF's work purposes.

To assist you in completing the STR form swiftly, you may click on this icon  to re-use data of a person/entity/account you have already filled in.

3) STR Form

1. INITIAL SUBSCRIPTION (TRANSACTION 1)

For the origin of the 1st financial flow, click on :

From – Person/Entity (= investor)

The screenshot shows a 'From' field with three selectable options, each in a separate box. The first box contains a plus sign, a document icon, the text 'Account', and 'Account (Our Client)'. The second box contains a plus sign, a person icon, the text 'Person', and 'Person (Our Client)'. The third box contains a plus sign, a document icon, the text 'Entity', and 'Entity (Our Client)'. Two red arrows originate from the text 'From – Person/Entity' above: one points to the 'Person' option and the other points to the 'Entity' option.

3) STR Form

In this part, the following information is mandatory :

- “Transaction type” : click on “Transfer” in drop down list ;
- country of origin of the transfer ;
- foreign currency ;
- amount (at time of investment); and
- exchange rate.

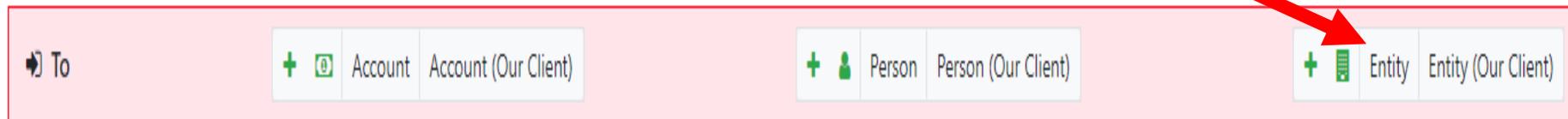
For the investing person, the following information is mandatory :

- First name ;
- last name; and
- citizenship.

Of course, any additional information is useful.

3) STR Form

For the destination of the 1st financial flow, click on
« To – Entity » (= intermediary)



The screenshot shows a horizontal menu with three selection options. Each option consists of a green plus sign icon, a small icon representing the entity type, and the text 'Entity (Our Client)'. The 'Entity' option is highlighted with a red arrow pointing to it.

➔ To	+ [Account Icon] Account Account (Our Client)	+ [Person Icon] Person Person (Our Client)	+ [Entity Icon] Entity Entity (Our Client)
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3) STR Form

In this part, the following information is mandatory :

- “Transaction type” : click on “Transfer” in drop down list ;
- country of destination of the transfer ;
- foreign currency ;
- amount ; and
- exchange rate.

For the receiving entity, the following information is mandatory :

- Name; and
- Incorporation country code.

Of course, any additional information is welcome.

3) STR Form

2. INITIAL SUBSCRIPTION (TRANSACTION 2)

For the origin of the 2nd financial flow, click on

« From – Account » (= intermediary account)



The screenshot shows a horizontal menu bar with a 'From' dropdown on the left. To its right are three selectable options, each with a green plus icon and a small icon representing the category:

- Account (Our Client)**: Includes a green plus icon, a green square with a white 'A', and the text 'Account' and 'Account (Our Client)'. A red arrow points to this option.
- Person (Our Client)**: Includes a green plus icon, a green person icon, and the text 'Person' and 'Person (Our Client)'.
- Entity (Our Client)**: Includes a green plus icon, a green document icon, and the text 'Entity' and 'Entity (Our Client)'.

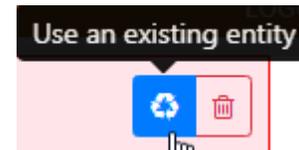
3) STR Form

In this part, the following information is mandatory :

- “Transaction type” : click on “**purchase of securities**” in drop down list ;
- Country where the account is held ;
- Foreign currency ;
- amount invested ;
- Exchange rate ;
- Account number at financial institution which receives subscription monies;
- swift of this financial insitution OR institution code.

For the receiving entity, the following information is mandatory :

- Name; and
- Incorporation country code.



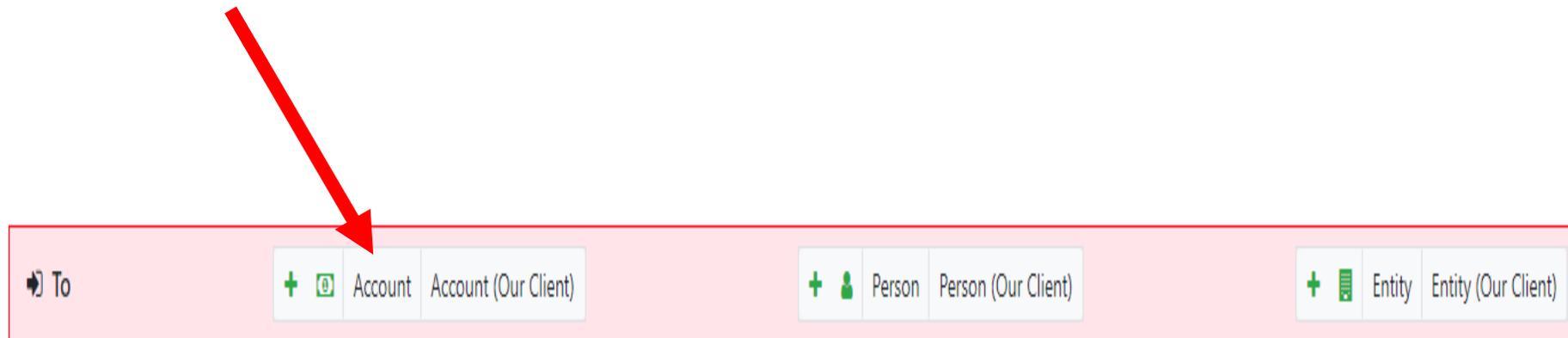
Of course, any additional information is welcome.

3) STR Form

For the destination of the 2nd financial flow, click on

«To – Account »

(= investment fund account)



The screenshot shows a horizontal menu bar with a red border. On the left, there is a dropdown menu labeled 'To' with a right-pointing arrow. To the right of the dropdown are three selectable options, each in a light gray box with a green plus icon and a small icon representing the category:

- Account**: Includes a green plus icon, a green icon of a document with a checkmark, and the text 'Account' and 'Account (Our Client)'. A red arrow points to this option.
- Person**: Includes a green plus icon, a green icon of a person, and the text 'Person' and 'Person (Our Client)'.
- Entity**: Includes a green plus icon, a green icon of a document with a checkmark, and the text 'Entity' and 'Entity (Our Client)'.

3) STR Form

In this part, the following information is mandatory :

- “Transaction type” : click on “**purchase of securities**” in drop down list ;
- Country where the account is held ;
- Foreign currency ;
- amount invested ;
- Exchange rate ;
- Account number at financial institution which receives subscription monies;
- swift of this financial institution OR Institution code

3) STR Form

- Account holder name ;
- Account type : click on “**portfolio of securities**” in drop down list
- Status : drop down list with choice (active/blocked/closed/dormant/freezing CRF/unknown) ;
- currency ;

balance (in account currency) + date of balance :



in view of potential CRF freeze

Of course, any additional information is welcome

3) STR Form

3. FINAL REDEMPTION (TRANSACTION 3)

For the origin of the 3rd financial flow, click on
« **From – Account** » (= investment fund account)



The screenshot shows a horizontal menu bar with a light pink background. On the left, there is a 'From' dropdown menu with a right-pointing arrow icon. To the right of this menu are three selectable options, each in a white box with a light grey border. The first option is 'Account (Our Client)', which includes a green plus sign and a green icon of a document with a checkmark. The second option is 'Person (Our Client)', which includes a green plus sign and a green icon of a person. The third option is 'Entity (Our Client)', which includes a green plus sign and a green icon of a document with a checkmark. A large red arrow points from the text above to the 'Account (Our Client)' option.

3) STR Form

In this part, the following information is mandatory :

- “Transaction type” : click on “**sale of securities**” in drop down list ;
- Country where the account is held ;
- Foreign currency ;
- Amount redeemed ;
- Exchange rate ;
- Account number at financial institution which receives redemption monies;
- swift of this financial institution OR Institution code.

3) STR Form

- Account holder name ;
- Account type : click on “**portfolio of securities**” in drop down list
- Status : drop down list with choice (active/blocked/closed/dormant/freezing CRF/unknown) ; and
- Currency.

Balance (in account currency) + date of balance :



in view of potential CRF freeze

Of course, any additional information is welcome

3) STR Form

For the destination of the 3rd financial flow, click on
« To – account » (= intermediary account)



The screenshot shows a horizontal menu with four items. The first item is 'To' with a right-pointing arrow icon. The second item is 'Account (Our Client)', which includes a green plus sign, a green document icon, and the text 'Account' and 'Account (Our Client)'. A red arrow points to this second item. The third item is 'Person (Our Client)', which includes a green plus sign, a green person icon, and the text 'Person' and 'Person (Our Client)'. The fourth item is 'Entity (Our Client)', which includes a green plus sign, a green document icon, and the text 'Entity' and 'Entity (Our Client)'.

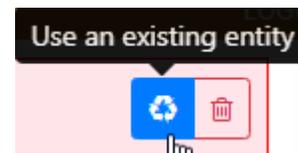
3) STR Form

In this part, the following information is mandatory :

- “Transaction type” : click on “**sale of securities**” in drop down list ;
- Country where the account is held ;
- Foreign currency ;
- Amount redeemed ;
- Exchange rate ;
- Account number at financial institution which receives redemption monies;
- swift of this financial institution OR Institution code.

For the receiving entity, the following information is mandatory :

- Name; and
- Incorporation country code.

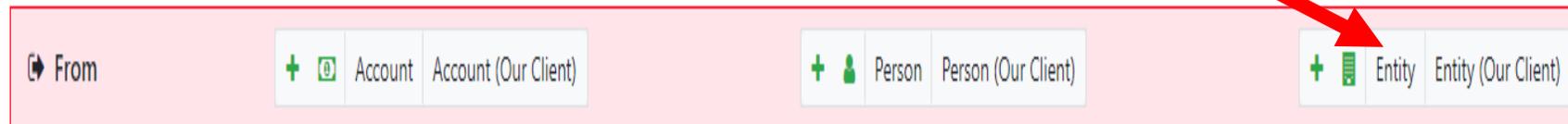


Of course, any additional information is welcome.

3) STR Form

4. FINAL REDEMPTION (TRANSACTION 4)

As origin of the 4th financial flow, click on
« From – entity » (= intermediary)



The screenshot shows a horizontal menu with a 'From' dropdown on the left. To its right are three selectable options, each with a green plus icon and a small icon representing the entity type:

- Account (Our Client) - with a document icon
- Person (Our Client) - with a person icon
- Entity (Our Client) - with a building icon

A red arrow points from the text above to the 'Entity (Our Client)' option.

3) STR Form

In this part, the following information is mandatory :

- “Transaction type” : click on “**transfer**” in drop down list ;
- Country of origin of the transfer ;
- Foreign currency ;
- amount redeemed ; and
- Exchange rate.

For the entity, the following information is mandatory :

- Name and
- Incorporation country code.

Of course, any additional information is welcome.

3) STR Form

For the destination of the 4th financial flow, click on
To – person/entity (= investor)



The screenshot shows a horizontal menu with three options, each in a light gray box with a red border. From left to right: 1. A dropdown arrow icon followed by the text 'To'. 2. A green plus icon, a green account icon, the text 'Account', and 'Account (Our Client)'. 3. A green plus icon, a green person icon, the text 'Person', and 'Person (Our Client)'. 4. A green plus icon, a green document icon, the text 'Entity', and 'Entity (Our Client)'. Two red arrows originate from the text above: one points to the 'Person' option and the other points to the 'Entity' option.

▾ To	+  Account Account (Our Client)	+  Person Person (Our Client)	+  Entity Entity (Our Client)
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3) STR Form

In this part, the following information is mandatory :

- “Transaction type” : click on “**transfer**” in drop down list ;
- Country of destination of the transfer ;
- Foreign currency ;
- amount redeemed ; and
- Exchange rate.

For the person, the following information is mandatory :

- First name;
- Last name; and
- citizenship.

Of course, any additional information is welcome.

Completed report

 STR is complete when all sections on the left are green.

 Red means that there is missing data.

Incomplete reports may not be filed with the CRF.

However, a report may be *saved at all times*. This allows users to start drafting a report and complete it as and when data becomes available.

Reports are not automatically saved. Data may be lost if this is not done on a regular basis.



QUESTIONS?