

GUIDELINES FOR REGISTRATION WITH FINANCIAL INTELLIGENCE UNIT

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1. Definitions

Authorisation Letter means the Supervisory Authority approval of the appointed Compliance Officer or Alternate Compliance Officer.

Alternate Compliance Officer means the person appointed in terms of section 34 (3) of the AML/CFT Act 2020

AML/CFT Act means the Anti-Money Laundering and Countering the Financing of Terrorism Act 2020

AML/CFT Regulations means the Anti-Money Laundering and Countering the Financing of Terrorism Regulations 2020

Compliance Officer means the person appointed in terms of section 34 (1) of the AML/CFT Act 2020

Financial Intelligence Unit means the body corporate established under section 10 of the AML/CFT Act 2020

goAML Web Application means the integrated software solution developed by the United Nations Office on Drugs and Crime (UNODC) and implemented by the FIU as its preferred IT platform for registration, reporting, data collection and secure communications with the FIU

Reporting Entity means an entity or persons specified in the First Schedule of the AML/CFT Act 2020

Supervisory Authority means the supervisory authorities specified in the Second Schedule of the AML/CFT Act 2020, namely the Central Bank of Seychelles, the Financial Services Authority and the Financial Intelligence Unit

2. Acronyms and Abbreviations

ACO	Alternate Compliance Officer			
AML/CFT Act	Anti-Money Laundering and Countering the Financing of			
711112 01 1 7101	Terrorism Act 2020			
AML/CFT Regulations	Anti-Money Laundering and Countering the Financing of			
7 IVILY OF T REGulations	Terrorism Regulations 2020			
СО	Compliance Officer			
FIU	Financial Intelligence Unit			
goAML	goAML Web Application			
UNODC	United Nations Office on Drugs and Crime			

3. Scope & Overview

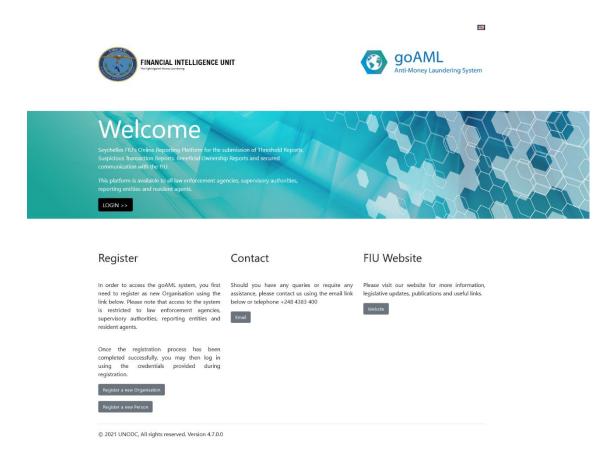
- 3.1. These guidelines are issued by the Financial Intelligence Unit ("FIU"), pursuant to section 57 (2) of the Anti-Money Laundering and Countering the Financing of Terrorism Act 2020, ("AML/CFT Act") and Regulation 7 (2) of the Anti-Money Laundering and Countering the Financing of Terrorism Regulations 2020 ("AML/CFT Regulations"), with the aim of providing detailed guidance on the procedures to be followed when a reporting entity registers with the FIU on the registration platform, namely goAML Web Application ("goAML").
- 3.2. These guidelines apply to all reporting entities specified under the First Schedule of the AML/CFT Act.
- 3.3. It is important that these guidelines are read carefully before proceeding to the registration platform so as to ensure that all required information and documents are available at hand during the registration process.
- 3.4. The procedures provided in these guidelines will be subjected to ongoing reviews and may be updated to reflect any new developments that occur in the AML/CFT Act, AML/CFT Regulations, any other relevant legislations or changes in goAML.

4. Introduction

- 4.1. In line with the requirements of Section 31 of the AML/CFT Act and Regulation 7 of the AML/CFT Regulations, all reporting entities specified under the First Schedule of the AML/CFT Act have an obligation to register with the FIU within 60 days of the coming into force of the AML/CFT Regulations or commencement of its business.
- 4.2. Regulation 7 (2) of the AML/CFT Regulations, further requires that the registration shall be in an electronic manner and the procedures for registration shall be as per the guidelines to be issued by the FIU.
- 4.3. In line with Regulations 7 (3) of the AML/CFT Regulations, every registration submitted to the FIU should contain the particulars listed below in respect of the reporting entity: -
 - (a) the legal name of the natural person, legal person or legal arrangement;
 - (b) registration number, license number, or National Identity Number;
 - (c) full contact details of the reporting entity;
 - (d) full name and contact details of the compliance officer and the alternative compliance officer; and
 - (e) any other particulars, as may be determined by the FIU from time to time.
- 4.4. For the purpose of achieving this obligation, the FIU has implemented the goAML platform, an integrated software system developed by the United Nations Office on Drugs and Crime (UNODC) for Financial Intelligence Units worldwide.
- 4.5. goAML, once fully operational, will be the prescribed method by which reporting entities will submit all relevant reports prescribed by the AML/CFT Act to the FIU and provide the platform for secure exchange of information between the FIU, reporting entities, law enforcement agencies and supervisory authorities.

5. goAML - Getting Started

- 5.1. goAML can be accessed from the FIU's website (www.seychellesfiu.sc) or by directly entering the URL link (https://www.fiu.sc:4443/goaml_live) into the web browser window, which will take the you directly to the goAML home page, displaying:
 - Register Link contains links to Register a New Organisation and Register as Person; and
 - Login Link contains the links to log in for reporting entities that have already registered.

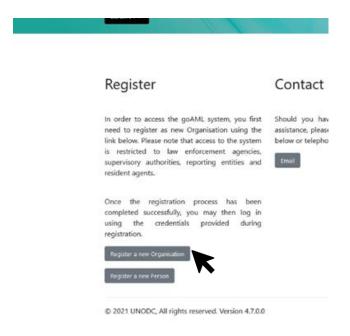


5.2. goAML runs within Firefox, and Google Chrome. It is advisable to add the URL to the trusted sites and have pop ups enabled to prevent the site from being blocked.

5.3. The goAML email address goaml.support@fiu.sc should also be added to your contact list to ensure that communications from goAML is not identified as a spam/junk email. Should you not receive an email in your inbox after registration, please check your spam/junk folder. The email should then be marked as "Not Junk".

6. Registration of Reporting Entities on goAML

- 6.1. The person authorized to register the reporting entity on goAML is the Compliance Officer ("CO"), appointed under Section 34 (1) of the AML/CFT Act, with the approval of their respective Supervisory Authority.
- 6.2. To register a reporting entity for the first time, the CO has to register the reporting entity as a new Organisation on goAML. The CO should click on Register a new Organisation on the home page as displayed below.



6.3. "Register as a new Organisation" should be selected, even if the reporting entity is a sole proprietorship operating in the owner's individual name.

- 6.4. The "Register as a New Organisation" page will display the registration form with the following **Headings** to be captured, which is further detailed below:
 - Registration Type
 - Registering Organisation
 - Registering Person
 - Attachments

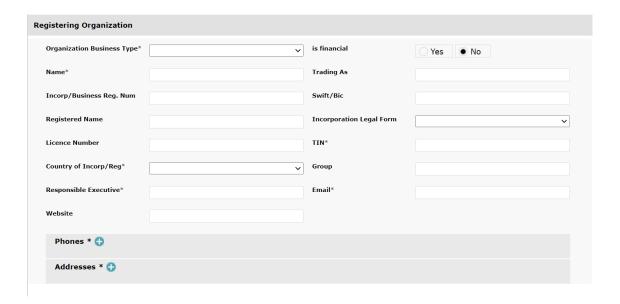
6.4.1. Registration Type

The registration type has three entity types to select from, namely Reporting Entity, Stakeholder and Supervisory Body. All reporting entities specified under the First Schedule of the AML/CFT Act must select **Reporting Entity** when registering with the FIU.



6.4.2. Registering Organisation

The details of the reporting entity are required to be provided under this section. Although not all the fields have been indicated as *mandatory, reporting entities are advised to ensure that all fields relevant to the respective legal form are completed with the required information. Failure to do so, may result in the rejection of the application by the FIU.



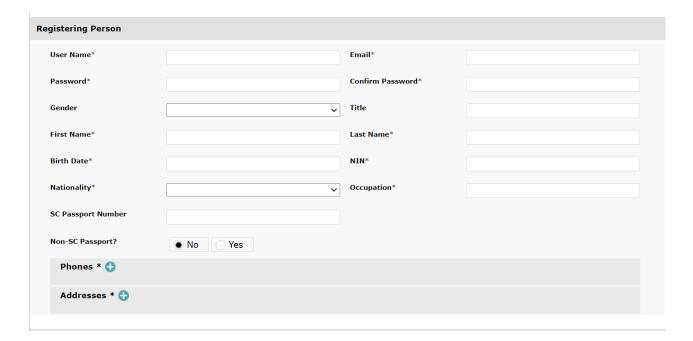
- Organisation Business Type: The list of reporting sectors as defined under the AML/CFT Act. The respective reporting sector must be selected from the drop-down list during the registration process. This field is mandatory.
- **is financial:** Is the reporting entity a financial institution with a Swift/BIC code? Please select Yes or No.
- Name: This refers to the name of your Organisation. If your business license is issued in your personal (individual) name, please insert your full name. This field is mandatory.
- Trading As: If the reporting entity has a trading name which is different from its registered name, please complete this field.
- Incorp./Business Reg. Num: This refers to the unique incorporation or registration number issued to the reporting entity upon incorporation/registration with the Registrar.
- **Swift/Bic:** If you have selected yes for "is financial", please insert your organization Swift/Bic code.

- Registered Name: The full registered name of the reporting entity.
- **Incorporation Legal Form:** From the drop-down list, select whether you are an association, partnership, private entity, public enterprise or a sole proprietorship.
- License Number: The unique licence number issued to the reporting entity by their respective licensing body/authority.
- TIN: The unique Tax Identification Number issued to your business upon registration with the Seychelles Revenue Commission. This field is mandatory.
- Country of Incorp./Reg: The country in which the business/company has been incorporated/registered. This field is mandatory.
- **Group:** If the reporting entity forms part of a business group, please indicate the name of the group.
- Responsible Executive: This is the name of the individual who has primary responsibility of the reporting entity e.g. the Chief Executive Officer, Managing Director, etc.... This field is mandatory.
- **Email:** This is the email address of the CO. This field is mandatory.
- Website: Business/Company website, if available
- Phones: Please refer to paragraph 6.3.4
- Addresses: Please refer to paragraph 6.3.5

6.4.3. Registering Person (Compliance Officer)

This section is required to be completed with the details of the CO. This person will be the primary contact person for the reporting entity, in line with the liaison functionality prescribed for under Section 34 (2) (h) of the AML/CFT Act. The CO will also have administrator access rights to the goAML system.

The CO should ensure to remember the credentials provided during the registration process, as these will be used to log in goAML thereafter. The username and password provided, should be unique and remain confidential to the CO to prevent unauthorized access to the platform.



- User Name: Unique username to be used by the CO to login to goAML. Should the CO be the appointed CO for more than one reporting entity, please note that the username should differ for each as duplicates will not be accepted by the system. This field is mandatory.
- Email: Email address of the CO. Should the CO be the appointed CO for more than one reporting entity, please note that the email address used

should differ for each as duplicates will not be accepted by the system. This field is mandatory.

- Password: Password must be between 5-10 characters, include capital alpha, alphanumeric and special characters (e.g., Pa\$sword12). This field is mandatory.
- Confirm Password: Retype the password. This field is mandatory.
- Gender: Male / Female.
- Title: Dr. / Mr. / Mrs. / Ms. / Miss. This field is mandatory.
- First Name: First name of the CO. This field is mandatory.
- Last Name: Last name / Surname of the CO. This field is mandatory.
- Birth Date: Date of birth of the CO. This field is mandatory.
- NIN: The Seychelles National Identity Number of the CO. This field is mandatory.
- Nationality: The nationality of the CO. This field is mandatory.
- Occupation: Official job title of the CO. This field is mandatory.
- SC Passport Number: Seychelles Passport Number.
- Non-SC Passport?: To select whether the CO is a non-Seychellois citizen. Please select Yes or No. If yes selected, the passport number of the CO and the issuing country is required.



Phones: Please refer to paragraph 6.3.4

Addresses: Please refer to paragraph 6.3.5

6.4.4. Contact Details

The contact details provided for the reporting entity and the registering person must be the business contact details. Please note that at least one contact number must be provided, with the option to add multiple contact numbers if required. Once all the required details have been completed, please click "Add" for the contact details to be saved and added.



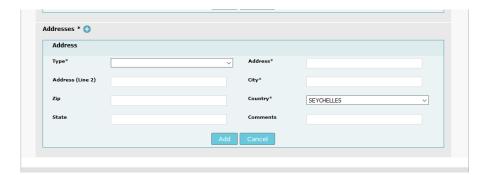
- Contact Type: Please select "Business" from the available drop-down list.
 This field is mandatory.
- Comm. Type: This can be Landline, Mobile or Fax. It is advisable to include at least a landline or mobile number. This field is mandatory.
- Country Prefix: This is the country code (+248)
- Number: The contact number for the selected communication type. This field is mandatory.

Extension: Extension number if available

Comments: Comments if any.

6.4.5. Address Details

The address details provided for the reporting entity and the registering person must be the business address details. Please note that at least one address must be provided, with the option to add multiple addresses if required. Once all the required details have been completed, please click "Add" for the address to be saved and added.



- Type: Please select "Business" from the available drop-down list. This field is mandatory.
- Address: Physical Address details like office/room number, building name, street name. This field is mandatory.
- Address (Line 2): Long addresses may be split into the two address fields.
- **City:** Town or the respective district or area e.g., Victoria, Providence, Ile Perseverance, etc. This field is mandatory.
- Zip: Leave blank.

Country: Seychelles

State: The island e.g., Mahé, Praslin

Comments: Comments if any.

6.4.6. Attachments

As part of the registration process, the following documents are required to be submitted for verification of the information provided, prior to the approval of the registration request by the FIU:

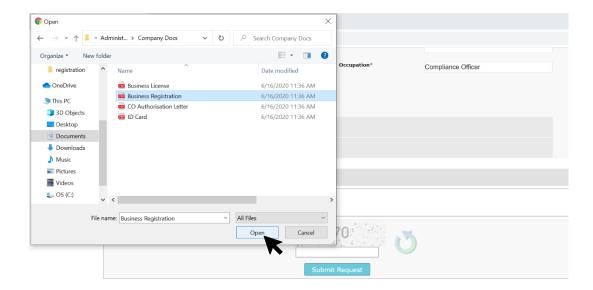
- Copy of the Certificate of Registration / Incorporation (where applicable)
- Copy of the Business License
- Authorisation Letter for the CO
- Identification Document of the CO

6.4.6.1. Uploading Documents

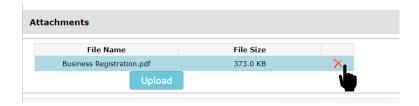
To upload documents, click on the "**Upload**" button which will open a window display to select the respective file/document required from the file browser window.



Once the required file/document has been selected, click open to upload the documents to the registration platform. Please note that documents should be saved in the following acceptable file formats: .pdf; .jpeg; and .png.



6.4.6.2. To delete an uploaded document, please select the X and the document will be removed from the platform.



6.4.7. Submission of Registration

Before submitting the request, type the Captcha (sequence of digits that appears on the screen in this case) into the box without making any errors.



Once submitted, a pop-up screen will be generated confirming that the registration information has been submitted, together with the allocated reference number for your request.

Registration info has been submitted

Please wait for notification of acceptance/rejection by email. Your request has been given the following reference number: RE_RP000005-17 DEC 2020

Additionally, two emails should be received through the email ID provided,

- The reporting entity; and
- The registering person i.e., the CO.

confirming receipt of registration request for:

7. Approval Process for Registration Request

- 7.1. Reporting Entities must ensure that information provided during the registration requests are accurate, and all required information are submitted in its entirety, together with all the relevant documentation as required.
- 7.2. Upon submission of a registration request by a reporting entity, the FIU will verify the information and documents provided by the reporting entity to ensure that the reporting entity and registering person submitting the request is authorized to do so.
- 7.3. Based on the verification undertaken by the FIU, the FIU will do either of the following within 72 hours after receiving the request:

7.3.1. Approve the request for registration

Provided that all the information and documents submitted meets the prescribed requirements, the FIU will proceed to approve the request for registration.

Upon approval, an email confirmation will be issued notifying the CO that the registration request has been accepted.

The CO will then be able to log in thereafter, as per process outlined under section 9 of these guidelines.

7.3.2. Reject the request for registration

A request for registration may be rejected under the following circumstances:

- a) There are mandatory information or documents which have not been provided as part of the registration process;
- b) The information provided is inaccurate and does not match the information on the documents provided;
- The person registering on behalf of the reporting entity is not authorized to do so; or
- d) The organization requesting registration is not designated as a reporting entity and as such unauthorized to obtain access to the goAML platform.

Upon rejection by the FIU, the CO will receive an email notifying the reporting entity that the request for registration has been rejected, with clear indication of the reasons for rejection.

If a request has been rejected on the basis of missing or inaccurate information or documents, the CO will have to complete the registration process again as per procedures outlined under Section 6 of these guidelines.

8. Adding an Additional Registering Person (Alternate Compliance Officer)

8.1. In line with the requirements of Regulations 7 (3) of the AML/CFT Regulations, the contact details of the Alternate Compliance Officer ("ACO") of the reporting entity are also required as part of the registration particulars with the FIU.

- 8.2. The ACO will only be able to register once the registration request of the reporting entity has been approved by the FIU.
- 8.3. To register, the ACO has to register as a new **Person** on goAML. This is done by selecting **Register a new Person** on the goAML home page as displayed below.

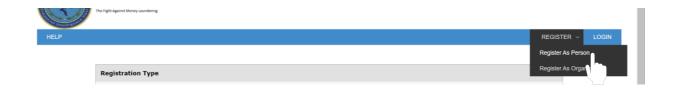
Register

In order to access the goAML system, you first need to register as new Organisation using the link below. Please note that access to the system is restricted to law enforcement agencies, supervisory authorities, reporting entities and resident agents.

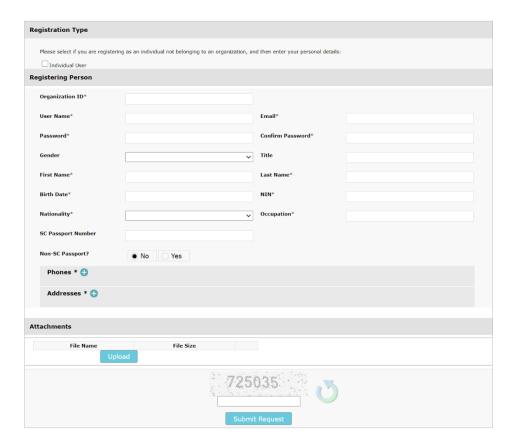
Once the registration process has been completed successfully, you may then log in using the credentials provided during registration.

Register a new Organisation

8.4. Alternatively, the ACO may access the link through the navigation bar on the registration home page.



8.5. The details of the ACO are required to be populated in the fields of the registration form shown below.



- 8.6. Please note that the checkbox under **Registration Type** should remain unchecked.
- 8.7. The Organisation ID, which is received by the reporting entity/CO upon the initial registration, must be provided to the ACO and inserted in the Organisation ID field, to enable the registration to be linked to the reporting entity. Please note that this field is mandatory.
- 8.8. For completion of the remaining fields, please refer to paragraphs 6.3.3 6.3.5 for description and guidance on the information required.
- 8.9. The ACO should ensure to remember the credentials provided during the registration process, as these will be used to log in goAML thereafter. The username and password provided, should be unique and remain confidential to the ACO to prevent unauthorized access to the platform

- 8.10.As part of the registration process, the following documents are also required to be attached, as per procedures outlined under paragraph 6.3.6, prior to the submission of the registration request:
 - Identification Document of the ACO
 - Authorisation Letter
- 8.11.Once all the fields have been completed and documents attached, you may proceed to submit the request for registration (see paragraph 6.3.7).
- 8.12. Upon submission, the ACO will receive an email notification confirming receipt of the registration request, and the request will undergo the approval process by the FIU as outlined under section 7 of these guidelines.
- 8.13.Once approved, the ACO will also have access to the goAML, using the credentials he/she provided during the registration process.

9. Log In/Out of goAML

- 9.1. Upon successful registration, the CO/ACO will gain access to goAML, using the username and password captured during the registration process.
- 9.2. The Login page can be accessed on the goAML Home page or on the registration page as shown below.

goAML Home Page



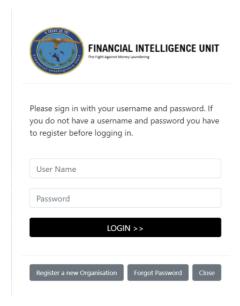




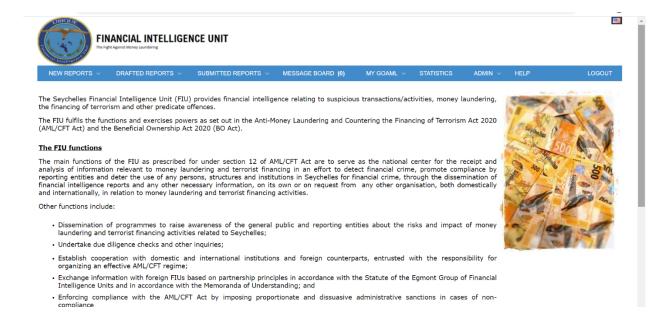
Registration Page



9.3. The Login page will be displayed, where your username and password should be entered.



9.4. Once logged in, the goAML internal secure home page will be as shown below:



9.5. Should you forget your password, please click on Forgot Password. This will redirect you to the below page, where your username and email needs to be provided to reset your password.



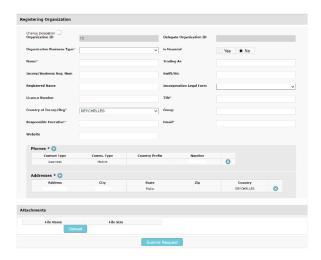
- 9.6. You will then receive an email with instructions on how to reset your password.
- 9.7. To log off from goAML, click on Log Out in the navigation bar and this will terminate the goAML session.
- 9.8. Please note that the user will be automatically logged out after 15 minutes of inactivity.

10. Notification of Changes

- 10.1.In accordance with Section 31 (4) of the AML/CFT Act every registered reporting entity are required to notify the FIU of any changes in the particulars furnished, in writing, within a period of 30 days from the date of such change.
- 10.2.goAML provides reporting entities the access to make changes to the User's details or the Organisation's details through the platform using the below functionality under the **MY GOAML** tab on the navigation bar.



- 10.3. The existing registration particulars within the system will be displayed for the reporting entity or the registered person depending on the option selected.
- 10.4. The new particulars should be populated in their respective fields, with the details which remains valid left unchanged.



- 10.5.A formal notification, in writing, provided by the responsible executive of the reporting entity must be attached to the change request, together with the relevant supporting documents before submission to the FIU.
- 10.6.Upon submission, the FIU will review the information and documents provided, before approving and effecting the change within the system.
- 10.7.For changes in the appointment of the CO/ACO, please refer to Section 11 of these guidelines.

11. Changes in appointment of CO/ACO

- 11.1.Where there is a change in the appointed CO, the reporting entity should notify the FIU, within a reasonable timeframe, in writing to enable the FIU to deactivate the previous CO's access and administrative rights to the reporting entity's goAML account.
- 11.2. The newly appointed CO will be required to register as a new person as per the procedures outlined under Section 8 of these guidelines, and will be provided with the administrative rights to goAML for the reporting entity.
- 11.3.If the newly appointed CO was registered as the ACO previously, he/she will not be required to re-register on the platform. The reporting entity will only have to inform the FIU, together with the authorization letter, so that the FIU may designate them as the administrator for the reporting entity.
- 11.4.If there is a change in the appointed ACO, the reporting entity should notify the FIU in writing to enable the FIU to deactivate the previous ACO's access to the reporting entity's goAML account.
- 11.5. The newly appointed ACO will be required to register as a new person as per the procedures outlined under Section 8 of these guidelines.

12. Cessation of Business operations

- 12.1. Where a reporting entity plans to cease its business operations, the reporting entity is required to notify the FIU, 14 days prior to such cessation, by electronic communication with the justification and effective date of no longer being a reporting entity in accordance with Regulations 7 (5) of the AML/CFT Regulations.
- 12.2.Upon notification, the FIU shall do the necessary to deactivate the goAML access for the reporting entity and its authorized users.
- 12.3.A letter confirming the deactivation of the reporting entity and its authorized users will be provided by the FIU within 14 days of deactivation.

13. Failure to Register with the FIU

- 13.1. Pursuant to Section 31 (5) of the AML/CFT Act, a reporting entity which intentionally fails to register with the FIU as required or fails to report the changes in the particulars provided, commits an offence, and is liable on conviction to a fine not exceeding SCR100,000.
- 13.2.In the event of any concern or uncertainty in respect to these guidelines, it is pertinent that reporting entities seek the necessary guidance from the FIU.