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# **Cash Flows Return– Completion Guide: Banking**

Document version: 1.3

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**Revision History:**

<b>Effective Date</b>	<b>Version Number</b>	<b>Revision Description</b>
4 November 2022	1.0	Initial release of document
31 January 2023	1.1	Updates to definitions, descriptions, and explanations
1 May 2023	1.2	Updates to referenced legislation.
1 May 2024	1.3	Updates to section 3.2 of the user guide.

## Contents

1	Introduction .....	4
2	Form Information .....	4
3	Accessing and Submitting the Cash Flows Return.....	4
3.1	Access to the Cash Flows return.....	4
3.2	Completing the Cash Flows return .....	10
4	Other Useful Information .....	11
4.1	User account lockouts.....	11
4.2	Internet Browser.....	11
4.3	Data and Security .....	11
4.4	Applicable Fees .....	11
5	<i>Cash Flows Return Guidance</i> .....	12
5.1	Relevant Payments .....	12
5.2	Terms and Definitions.....	12
5.3	Survey Completion Guide.....	13

## 1 INTRODUCTION

As part of the Cayman Islands Monetary Authority's (the "Authority") responsibility for monitoring compliance of relevant financial businesses with anti-money laundering, counter terrorist financing, and proliferation financing requirements, entities holding a Category A, B, or Restricted B Bank licence under the Banks and Trust Companies Act (2021 Revision), collectively referred to as "Entities" for purposes of this form, are required, to submit a Cash Flows Return on a quarterly basis. The Cash Flows Return- Banking Form provides the Authority with data relating to the inflow and outflow of cross-border transfers within the banking sector and allows the Authority to analyse, model, and score ML/TF/PF and Sanctions risk exposures arising from inflow and outflow transfers.

Entities are required to provide this data by completing the Cash Flows Return – Banking Form and submitting it through the Authority's web-based web based portal, STRIX, to the Anti-Money Laundering Division (the "AML D"), within sixty (60) days after distribution by the Authority.

The Cash Flows Return – Banking Form is issued in accordance with the Authority's responsibilities under section 17(3) of the Bank and Trust Companies Act (2021 Revision).

## 2 FORM INFORMATION

The Cash Flows Return is intended for reporting relevant cross-border payments between entities holding a Category A, B, or Restricted B Bank licence and a counterparty located in a jurisdiction other than the Cayman Islands. For the purposes of this return, relevant payments include wire transfers, remittances, and internal transfers but may also include other forms of electronic transfers and payment systems.

## 3 ACCESSING AND SUBMITTING THE CASH FLOWS RETURN

### 3.1 ACCESS TO THE CASH FLOWS RETURN


Entities will receive an invitation to the web-based portal by email using the current email contact details of the Entity which the Authority has on record. Each contact of the Entity who receives an invitation email can activate their own account. The invitation email is specific to the recipient email address and cannot be shared or forwarded. Clicking on the link provided in the invitation email will take the user to the account creation webpage. On successful account activation, the user will receive a confirmation email.

Logging into the STRIX portal is then accomplished by clicking on the 'Return Home' button available immediately after activating, or via the link provided in the confirmation email. Account login is only possible using a two-factor verification code which will be sent by email to the individual. If an Entity has multiple points of contact on file, they will all have joint access to the same survey.

The Authority is using the following entity contacts to distribute the Cash Flows Return: AMLCO, MLROs and additional contacts, upon request of the Entity. If an Entity is unsure of what their contact details are, they can contact the Authority at [AMLSurveys@cima.ky](mailto:AMLSurveys@cima.ky).

To access the Cash Flows Return:

1. When the Cash Flows Return is distributed from STRIX, the recipients will receive an invitation email from “Cayman Islands Monetary Authority” with the address [AMLDoNotReply@cima.ky](mailto:AMLDoNotReply@cima.ky). The email will request the recipient to ‘Confirm Account’. The recipient should click on the ‘Confirm Account’ button, which will redirect the recipient to the activation page using their default browser. A modern browser (e.g. MS Edge, Chrome, Safari) should be used for security purposes.



**Cayman Islands Monetary Authority**

In accordance with our duties under section 6(b)(ii) of the Monetary Authority Act, the Authority requires the entity to complete the following AML/CFT/CFP and Sanctions survey.

Survey Name: **Securities AML/CFT Survey**

Submission Deadline: **15 September 2022, 23:59 (UTC-05:00) Bogota, Lima, Quito, Rio Branco**

Entity Name: Company ABC

Entity Unique ID: BSD1234

The **Username** for this account is:

The following link provides steps to **activate your account**:

Confirm Account

If the above button is not clickable, try clicking the URL or copying and pasting the URL below into the address bar of your web browser.

<https://amlidentity.cimaconnect.com/UserActivation/SetPassword?SecurityCode=YJa0JBLI86VZVCRbBxmmm3fq3fSoAMoPYyQ6XKFqtx0MoYgkSpT5b5bDc%2B2cghPQ8d%2BUVVhbZktQht%2F4d2cbioYpsg%2BJke0tE3GtlwMObYsoP%2Bk8rPURRSvrPSQt6JA5hgsaBaC6uvcZV4KB266HIFgh4FhAtaTNSa3IE3aiA%3D>

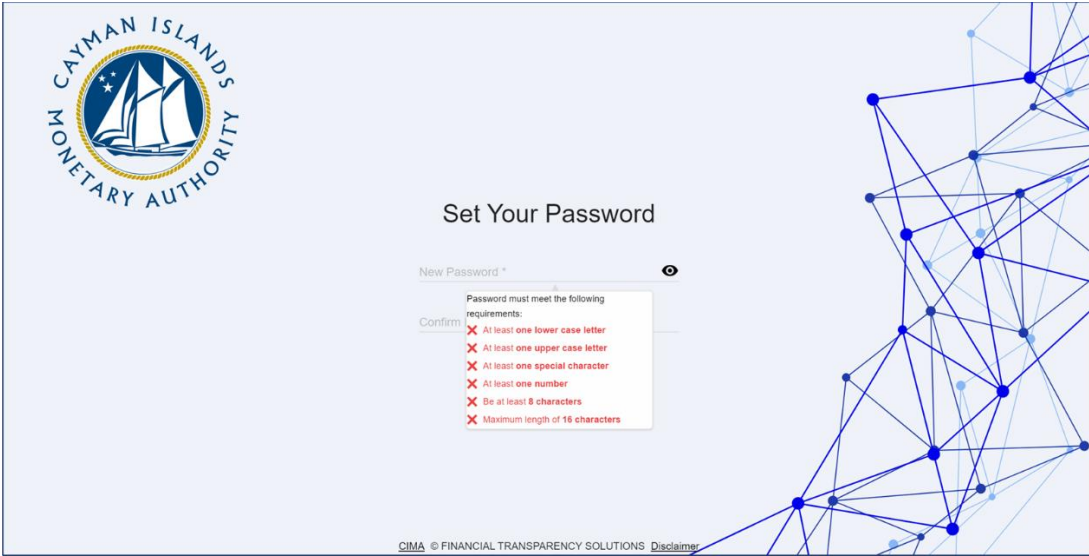
For any questions concerning the survey or the current reporting cycle, please contact: [AMLSurvey@cima.ky](mailto:AMLSurvey@cima.ky)

Please do not reply to this email, it is automatically generated.

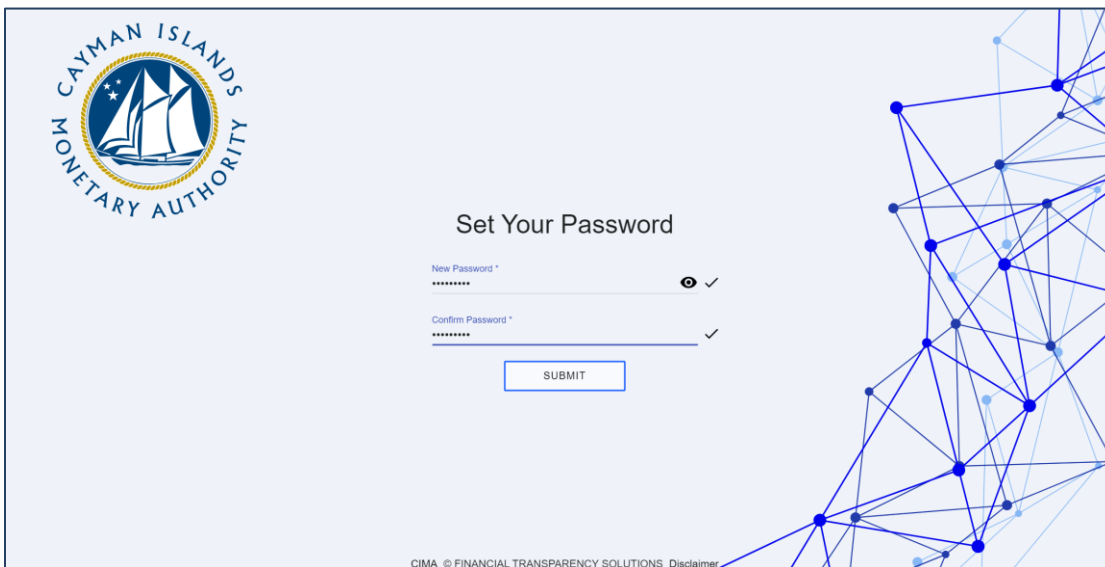
Disclaimer:  
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

Strix™ AML is part of the Financial Transparency Solutions product suite. [www.ft-solutions.com](http://www.ft-solutions.com)

2. The recipient will then be asked to create a password using uppercase, lowercase, number, and a special character. The password is required to be between 8 and 16 characters long.



3. The recipient will be asked to re-enter their password.



4. Once the recipient’s password has been re-entered, and matches, they can submit and finish the activation process. An email “Notification of Successful Activation” will be sent providing a ‘Go to Portal’ link which can be used for all future access.



## Cayman Islands Monetary Authority

The **Username** for this account is:

**Your account has been successfully activated.**

The following link provides access to your account:

[Go to Portal](#)

If the above button is not clickable, try clicking the URL or copying and pasting the URL below into the address bar of your web browser.

<https://amlsurvey.cimaconnect.com>

If you did not initiate this request, please contact us immediately at: [AMLSurvey@cima.ky](mailto:AMLSurvey@cima.ky)

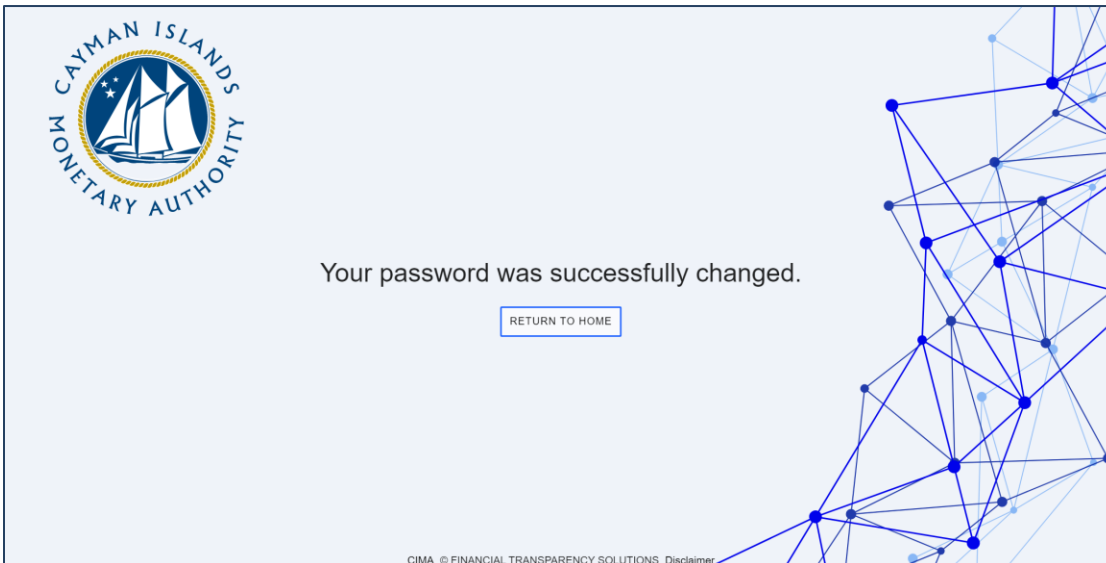
Please do not reply to this email, it is automatically generated.

**Disclaimer:**

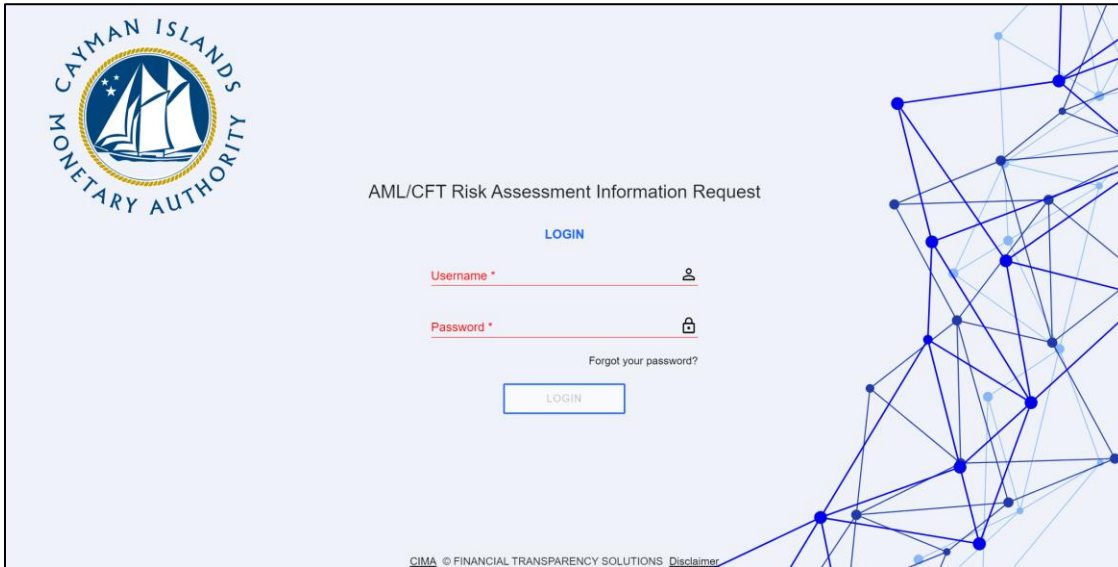
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

Strix™ AML is part of the Financial Transparency Solutions product suite, [www.ft-solutions.com](http://www.ft-solutions.com)

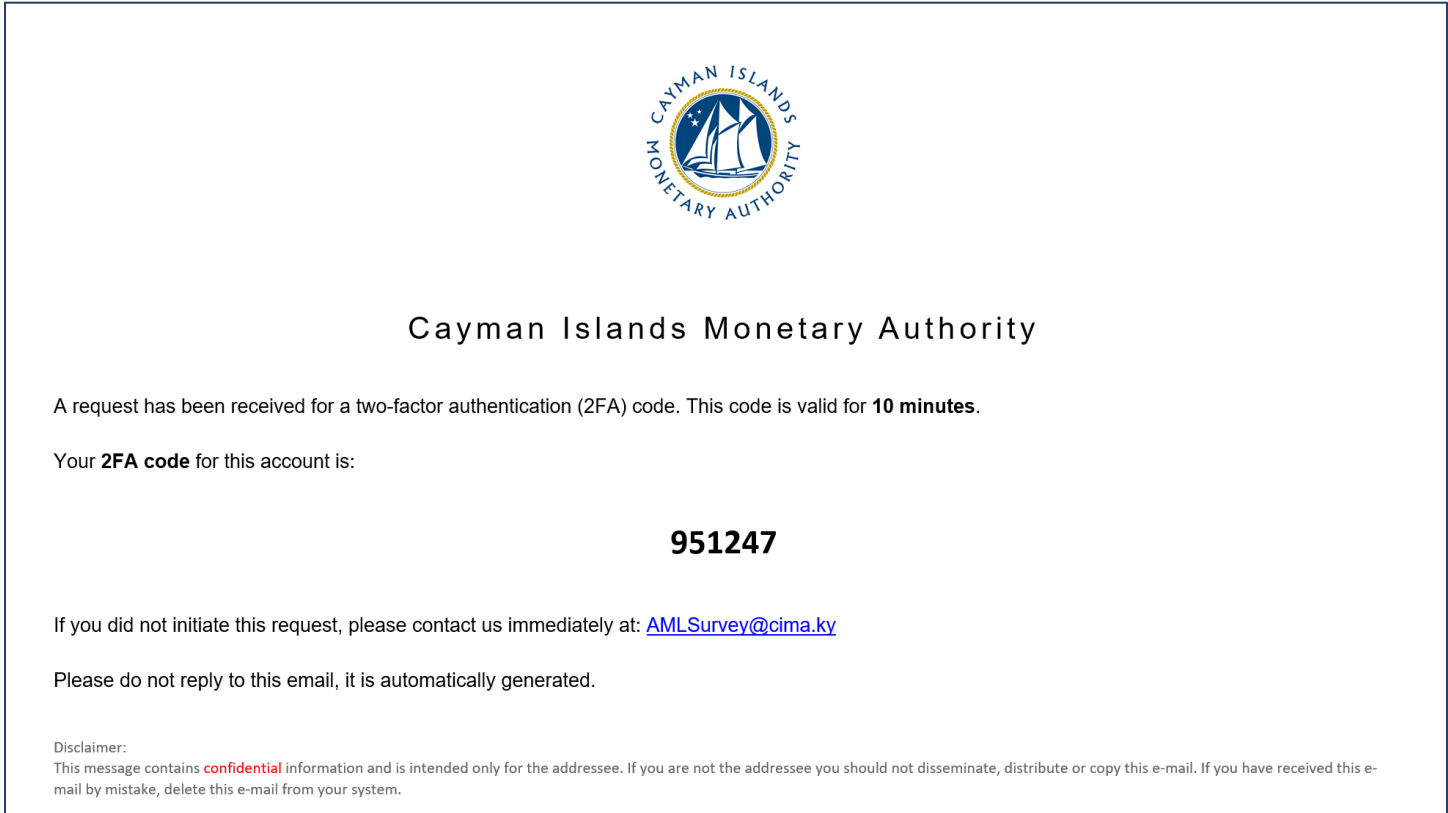
5. The user should then click on the 'Return To Home' button.



- 6. The recipient should then enter their username, which is their email address where they received the Cash Flows Return invite, and the password they just created.

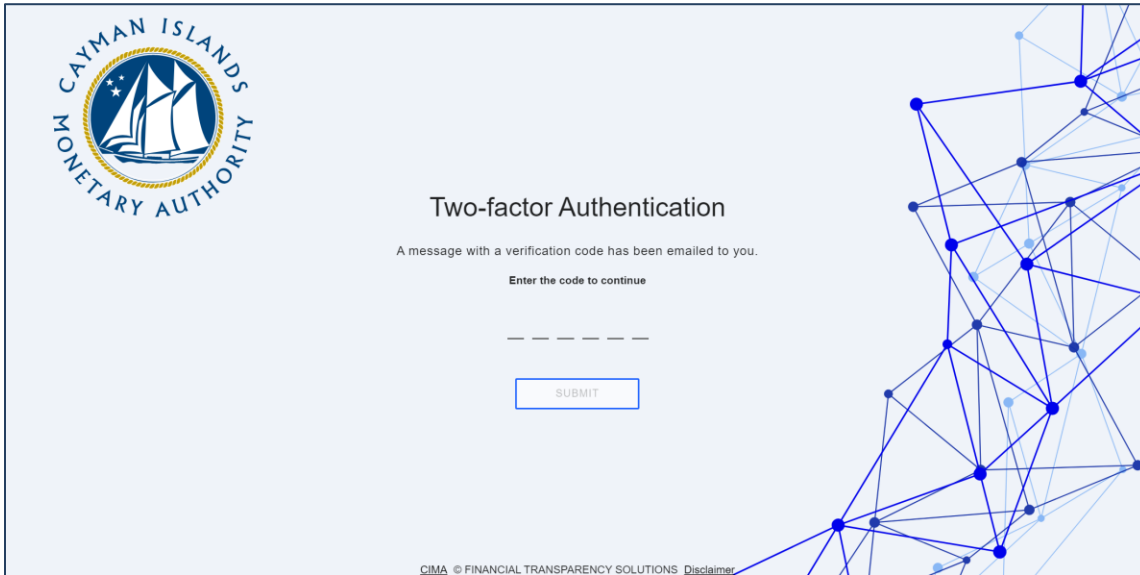


- 7. A six digit two-factor authentication code will be sent to the survey recipient’s email

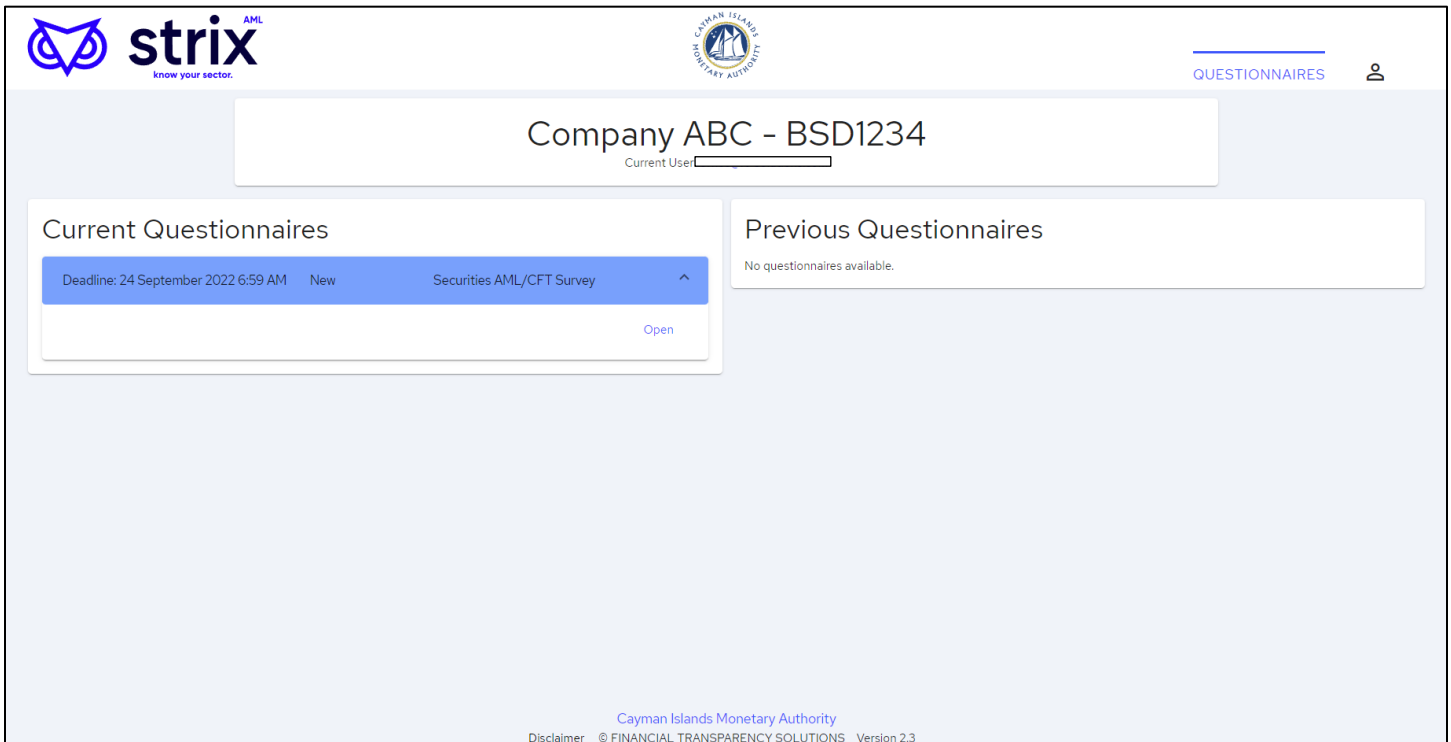




- 8. The recipient should enter the six (6) digit two-factor authentication code on the webpage where prompted.



- 9. Click 'Open' to access the Cash Flows Return request. If a survey recipient is a contact for two (2) or more FSPs, or where an Entity has two or more licences or registrations, related surveys will be listed here for the recipient to view and access.



## 3.2 COMPLETING THE CASH FLOWS RETURN

1. Click the Current Questionnaire to access the Cash Flows Return – Banking Form and start populating the form with the required data.
  - a. Completion guidance for the Cash Flows Return is available at section 5 of this Guide below.
  - b. The recipient(s) can open, update, and close the Cash Flows Return as many times as needed prior to the survey due date so long as the recipient selects 'Save'.
  - c. Once the Cash Flows Return has been completed it can either be 'Saved' and 'Exported' for internal review or 'Saved' and 'Submitted' to the Authority.
  - d. Upon submission, you will receive a confirmation email from Cayman Islands Monetary Authority stating, 'Notification of Successful Submission'. The Entity's name and the survey name will be listed for verification, useful for instances where users are submitting for more than one entity.
  - e. Once the Cash Flows Return is 'Submitted' an Excel and PDF copy of the completed survey will be available under 'Current Questionnaire'.
  - f. Upon submission to the Authority a review of the Cash Flows Return will be conducted by a member of the AMLD, if information is missing or needs clarification the Authority will 'Reject' the Cash Flows Return through an email notification detailing the specifics. The recipient will then be required to make the necessary corrections or provide the additional detail to the Authority as indicated in the email.
  - g. Partial or incomplete submissions will only be permitted by the Authority under approved circumstances. If an Entity submits an 'Incomplete' Cash Flows Return, they are required to submit a Request for Incomplete Submission to the Authority. Incomplete Submission Requests are to be submitted to [AMLSurveys@cima.ky](mailto:AMLSurveys@cima.ky) detailing the following:
    - i. Licence or Registration Name
    - ii. Licenced or Registration Number
    - iii. Date of Licence or Registration
    - iv. List of current directors
    - v. Number of Clients
    - vi. Reason for requesting to make an Incomplete Submission.
  - h. The Cash Flows Return is to be completed quarterly and should be submitted through the STRIX portal sixty (60) days after being distributed by the Authority.
2. If a User receives or has access to more than one survey, they will see the additional survey(s) in the 'Current User' section of the web page. At the top of the page, where it shows the Entity's name, there should be a bold blue number indicating the number of Entity accounts the user has access to. Once the user clicks the number, a drop-down list will appear displaying the additional Entity names.
3. The STRIX portal allows you to copy two-column lists from an Excel document and paste the data directly into the survey. Given that there are several questions in the survey that require country

breakdown details, the ability to bulk paste into STRIX will ease the burden of inputting individual responses. To upload bulk entries for those country breakdown questions, please do the following:

- a. *Open an Excel spreadsheet and using 2 columns – enter the question responses (number or value) in the first column and the country details (ISO code or name) in the second column.*
- b. *Highlight and copy the information from the 2 columns in Excel, select the upload button next to the relevant question in STRIX and then paste the data into the pop-up window.*
- c. *Select 'Add' to upload the desired data into the survey form, or 'Clear' to remove the data.*

*Note: Individual items may also be removed from the list by clicking on the delete button, next to the respective country, on the list.*

## 4 OTHER USEFUL INFORMATION

### 4.1 USER ACCOUNT LOCKOUTS

In the event a recipient has exceeded the number of permitted failed login attempts, their account will be temporarily locked. An email will be sent to the user identifying that they won't be able to log in. There are three (3) stages of lock out: 1) locked out for five (5) minutes; locked out for ten (10) minutes; and, if the user persists, locked out permanently.

To avoid being locked out, if the user fails to remember their password, they should update their password on the login page.

If the user is permanently locked out, they should contact [AMLSurveys@cima.ky](mailto:AMLSurveys@cima.ky) to request for re-activation of their account.

### 4.2 INTERNET BROWSER

Users should be aware that the Cash Flows Return will not open using the legacy Windows Explorer browser or with dated Windows operating systems for security purposes. If the user's browser is defaulted to Explorer the link should be copied and opened in Chrome, Edge, Safari, or other modern browser.

### 4.3 DATA AND SECURITY

The Cash Flows Return, the auto-generated communication from STRIX, and the data collected from FSPs in the Cash Flows Return are all maintained on-premises on the Authority's server systems. The Authority continues to use the same firewalls and data protection protocols that are deployed for the REEFs portal and other applications.

### 4.4 APPLICABLE FEES

There are no fees associated with this Form.

## 5 CASH FLOWS RETURN GUIDANCE

### 5.1 RELEVANT PAYMENTS

Where a counterparty is located in a jurisdiction outside the Cayman Islands, Entities are to report the sum of all relevant payment types, which include wire transfers, remittances and internal transfers, but may also include other forms of electronic transfers and payment systems where monies are transferred either from or to an account of the Cayman Islands bank or branch. Non-transactional messages, such as queries related to previous payments, are not to be included.

Category 'B' Banks should exclude any payments which are executed via Category 'A' banks located in the Cayman Islands.

Branches of banks that are not incorporated in the Cayman Islands should only report payments, accounting/book entries and internal transfers related to the accounts of the Cayman Islands branch, or on behalf of customers of the Cayman Islands branch.

### 5.2 TERMS AND DEFINITIONS

Terms/Abbreviations	Definition/Meaning
AMLRs	Anti-Money Laundering Regulations (2023 Revision), as amended.
Client / Customer	A person who is in a business relationship, or is carrying out a one-off transaction, with a person who is carrying out relevant financial business in the Islands.
Country	<p>The <b>country of origin</b> is the initial ordering country for payments <b>received</b> and/or booked by the reporting entity (inflows).</p> <p>For example, if an entity in country Y initiates a transfer from its bank in country X, then the country of origin is country X.</p> <p>For payments <b>sent</b> and/or booked by the reporting entity (outflows), the end beneficiary country is the country where the end beneficiary's bank is located.</p>
Cross-border payment	Transfer of funds between (i) entities holding a Category A, B, or Restricted B Bank licence and (ii) a counterparty located in a jurisdiction other than the Cayman Islands.
Currency used for the Survey	<b>United States Dollars (US\$).</b>

	All other currencies must be converted to US\$ unless otherwise stated, using the prevailing rate of exchange as at the last day of the reporting period.
Funds Inflows	Receipt of funds by a client from a sender, via wire transfers, remittances, and internal transfers, but may also include other forms of electronic transfers and payment systems.
Funds Outflows	Transfer of funds by a client to a beneficiary, via wire transfers, remittances, and internal transfers, but may also include other forms of electronic transfers and payment systems.
Relevant Payment Types	<p><b>SWIFT, FEDWIRE, BACS, CHAPS, CIPS, FASTER PAYMENTS, GPS, OPICS, PEGA, RIPPLE</b> - These options refer to common payment and settlement systems for relevant payments through a domestic payment system or an intermediary bank.</p> <p><b>Book Entry ONLY</b> (<i>Category 'B' Banks</i>) - This option refers to accounting/book entries and internal transfers that involve a Cayman Islands bank or branch but do not involve payment and settlement systems.</p> <p><b>Other</b> - This option refers to any payment and settlement systems or transactions other than the aforementioned options.</p>
Reporting Periods	<p>Every Quarter of each Year as follows:</p> <p>Quarter 1: 1 January to 31 March  Quarter 2: 1 April to 30 June  Quarter 3: 1 July to 31 September  Quarter 4: 1 October to 31 December</p>

### 5.3 SURVEY COMPLETION GUIDE

Ref. No.	Question No.	Question	Description/Explanation
1.1.1	1	Total Clients / Customers	Enter the total number of Clients the entity has as at the end of the reporting period.

			<p>This number should include all clients the entity provides financial products and services to as opposed to accounts e.g., If the same client, individual or legal entity, has two accounts in the same name, then only 1 client should be counted. Do not double count.</p> <p>Where applicable, the number of Clients / Customers should only include those of the Cayman Islands branch.</p> <p>Total clients consist of natural persons and legal persons and arrangements.</p>
1.1.2	2	Total Transactions for the reporting period.	<p>Enter the total number of Transactions conducted during the reporting period.</p> <p>Where applicable, the Total Transactions should only include those of the Cayman Islands branch.</p>
1.1.3	3	Total value of client assets.	<p>Enter the total value of client assets as at the end of the reporting period.</p> <p>Where applicable, the total value of assets should only include those of the Cayman Islands branch.</p>
2.1.2	4	Total value of funds received, broken down by originating country of payment.	Enter the total value of payments received from counterparties located outside the Cayman Islands, during the reporting period, broken down by country of origin.
2.1.3	5	Total number of incoming transactions, broken down by origin country of the transaction.	Enter the total number of payments received from counterparties located outside the Cayman Islands, during the reporting period, broken down by country of origin.
2.1.4	6	Total number of incoming transactions, broken down by payment systems.	<p>Enter the total number of payments received from counterparties located outside the Cayman Islands, during the reporting period, broken down by the listed payment systems:</p> <ul style="list-style-type: none"> <li>• SWIFT, FEDWIRE, CHAPS, BACS, CIPS, Faster Payments, GPS, OPICS, PEGA, RIPPLE</li> <li>• Book Entry ONLY</li> </ul>

			<ul style="list-style-type: none"> <li>Other - forms of Payment not listed above</li> </ul>
2.1.6	7	Total value of funds transferred out (remitted to clients or on behalf of clients), broken down by the country of payment destination.	Enter the total value of payments transferred out to counterparties located outside the Cayman Islands, during the reporting period, where the entity is the Originator, broken down by destination country.
2.1.7	8	Total number of transactions relating to funds transferred out by clients (outflows) during the reporting period, broken down by destination country of the transaction.	Enter the total number of outgoing payments transferred out to counterparties located outside the Cayman Islands during the reporting period, where the entity is the Originator, broken down by destination country.
2.1.8	9	Total number of outgoing transactions, broken down by payment systems.	<p>Enter the total number of outgoing payment transactions to counterparties located outside the Cayman Islands during the reporting period, broken down by the listed payment system:</p> <ul style="list-style-type: none"> <li>SWIFT, FEDWIRE, CHAPS, BACS, CIPS, Faster Payments, GPS, OPICS, PEGA, RIPPLE</li> <li>Book Entry ONLY (<i>Category 'B' Banks</i>)</li> <li>Other - forms of Payment not listed above</li> </ul>
2.2.1	10	Do you have any comments or feedback for this tab?	Please select 'Yes' or 'No'.
2.2.2	11	Please use this area to provide any comments or feedback for this tab.	If "Yes" to Q10, please input any comments or feedback for this tab.