

# Cash Flows Return – Completion Guide: Banking

Document version: 1.5

# **Revision History:**

Effective Date	Version Number	Revision Description	
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	
4 November 2024	1.4	Updates to definitions, descriptions, and explanations	
01 May 2025	1.5	Updates to version of referenced legislation.	

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#### 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, Proliferation Financing, and Sanctions requirements ("ML/TF/PF and Sanctions"), Entities holding a Category A, B, or Restricted B Bank licence under the Banks and Trust Companies Act (2025 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 cumulative inflows and outflows of the banking sector to allow the Authority to analyse, model, and score ML/TF/PF and Sanctions risk exposures.

Entities are required to provide this data by completing the Cash Flows Return – Banking Form and submitting it through the Authority's web-based portal, Strix, to the Anti-Money Laundering Division (the "AMLD"), 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 (2025 Revision).

#### 2 FORM INFORMATION

The Cash Flows Return is intended for reporting transactions between entities holding a Category A, B, or Restricted B Bank licence. For the purposes of this return, relevant payments include wire transfers, remittances, and transfers to another institution, including group entities, but may also include other forms of electronic transfers and payment systems. Entities are not required to report internal bank transfers between its own client accounts within the Cayman Entity.

#### 3 ACCESSING AND SUBMITTING THE CASH FLOWS RETURN

#### 3.1 ACCESS TO THE CASH FLOWS RETURN

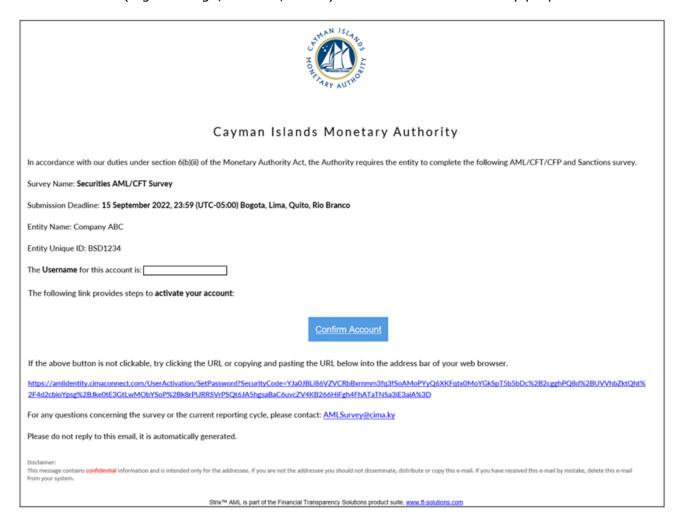
Entities will receive an invitation to the web-based portal by email, using the current email contact details of the Entity which the Authority has on record. Each member of the Entity who receives an invitation email can activate their own account. The invitation email is specific to the recipient's 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: Anti-Money Laundering Compliance Officer ("AMLCO"), Money Laundering Reporting Officer ("MLRO"), Deputy Money Laundering Reporting Officer

("DMLRO") and any other additional contacts, upon request from the Entity. If an Entity is unsure of the current contact details the Authority has on record, they can contact the Authority at <a href="mailto:AMLSurveys@cima.ky">AMLSurveys@cima.ky</a>.

#### To access the Cash Flows Return:

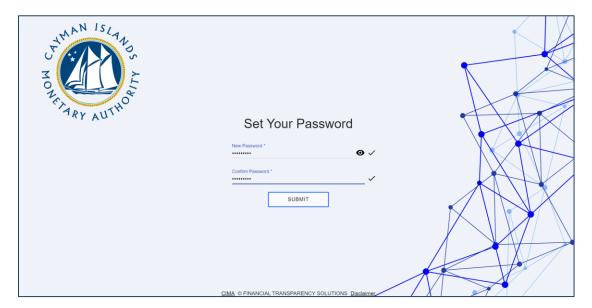
1. When the Cash Flows Return is distributed from Strix, the recipients will receive an invitation email from "Cayman Islands Monetary Authority" with the address <a href="mailto:AMLDoNotReply@cima.ky">AMLDoNotReply@cima.ky</a>. The email will request the recipient to 'Confirm Account'. The recipient 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.



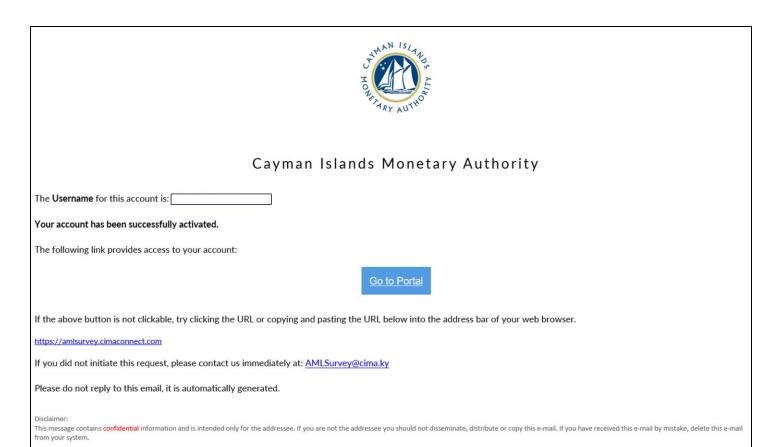
2. The recipient will then be asked to create a password which should include at least one uppercase letter, lowercase letter, number, and a special character. The password is required to be between 8 and 16 characters long.



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.

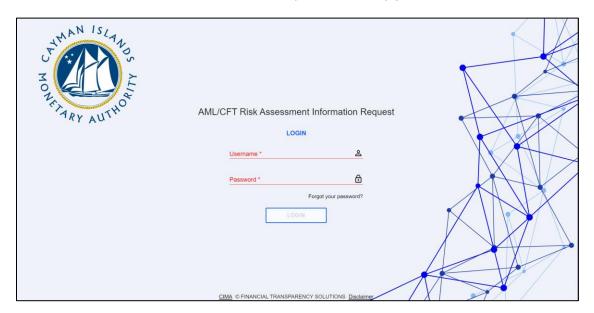


Strix™ AML is part of the Financial Transparency Solutions product suite, www.ft-solutions.com

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



6. The recipient should then enter their username, which is the 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 address.



## Cayman Islands Monetary Authority

A request has been received for a two-factor authentication (2FA) code. This code is valid for 10 minutes.

Your **2FA code** for this account is:

## 951247

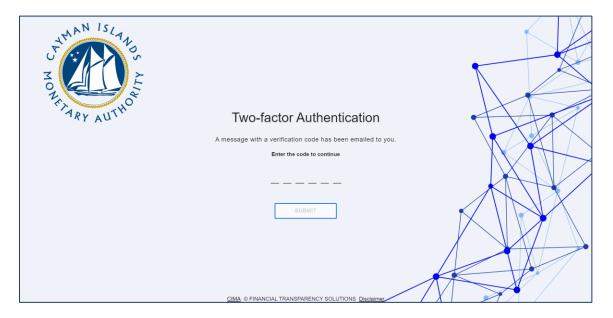
If you did not initiate this request, please contact us immediately at: <a href="mailto:AMLSurvey@cima.ky">AMLSurvey@cima.ky</a>

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

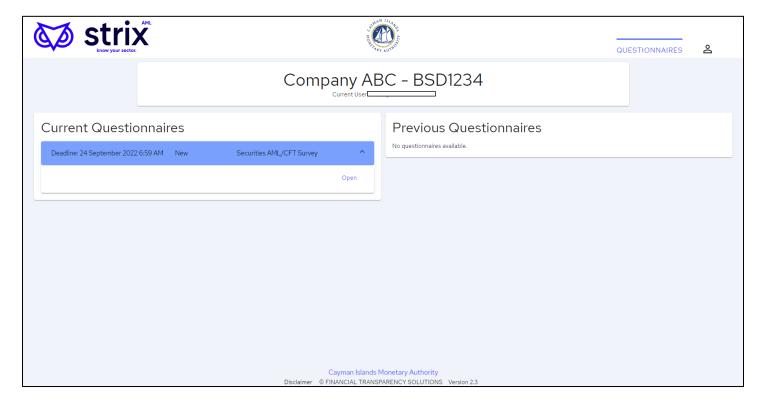
Disclaimer

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.

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 in 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, which is 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 details to the Authority as indicated in the email.
  - g. Partial or incomplete submissions will only be permitted by the Authority under approved circumstances. Prior to submitting an 'Incomplete' Cash Flows Return, the entity is required to submit a Request for Incomplete Submission to the Authority. Incomplete Submission Requests are to be submitted to <a href="mailto:AMLSurveys@cima.ky">AMLSurveys@cima.ky</a> 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.

#### 3.3 EXCEL FUNCTIONALITY

1. 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 will not be able to log in. There are three (3) stages of lock out: 1) locked out for five (5) minutes; 2) locked out for ten (10) minutes; and, 3) 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 <a href="mailto:AMLSurveys@cima.ky">AMLSurveys@cima.ky</a> to request to have their account re-activated.

#### 4.2 INTERNET BROWSER

Users should be aware that the Cash Flows Return will not open using the legacy Windows Explorer browser or with outdated 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 another modern browser.

#### 4.3 TWO-FACTOR AUTHENTICATION

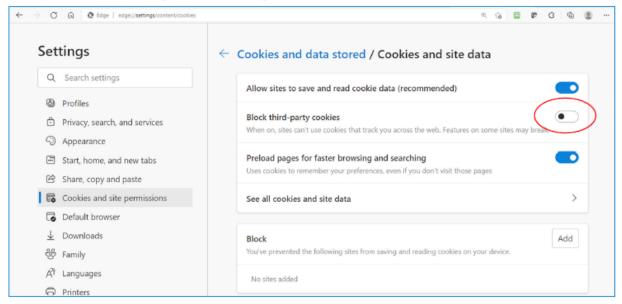
Due to the security permissions around the two-factor authentication, the invite to the Cash Flows Return, or the access to the portal, cannot be shared with uninvited recipients. If entities wish to add additional users to assist with completing or reviewing the form, they can contact <a href="Malloureveys@cima.ky">AMLSurveys@cima.ky</a>.

If an Entity's recipient is set up as a contact to the Strix portal but they are not receiving their two-factor authentication code, they should attempt the following prior to contacting <a href="Malloureveys@cima.ky">AMLSurveys@cima.ky</a>:

1) Check the date / time settings of the individual's computer and be sure they are set to 'Automatic'.

- 2) Try a different browser on the same computer (a secure modern browser is required Chrome, Edge, Safari, Firefox).
- 3) Ensure that amldonotreply@cima.ky is not blocked by the individual / Entity's network security.
- 4) Check that third party cookies are allowed:

Example of Microsoft Edge Cookie Setting:



#### 4.4 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.

#### 4.5 APPLICABLE FEES

There are no fees associated with this Form.

#### 5 CASH FLOWS RETURN GUIDANCE

#### 5.1 RELEVANT PAYMENTS

Entities are to report the sum of all relevant payment types, which include wire transfers and remittances, 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.

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

## 5.2 TERMS AND DEFINITIONS

Terms/Abbreviations	Definition/Meaning	
AMLRs	Anti-Money Laundering Regulations (2025 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.	
	Generally, a Bank's Clients/ Customers are made up of Natural Persons, Legal Persons, and Legal Arrangements.	
	The <b>country of origin</b> is the initial ordering country for payments <b>received</b> and/or booked by the reporting entity (inflows).	
Country	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.	
	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.	
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	United States Dollars (US\$). 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		

	SWIFT, FEDWIRE, BACS, CHAPS, CIPS, FASTER PAYMENTS, GPS, OPICS, PEGA, RIPPLE - These options refer to common payment and settlement systems for relevant payments through a domestic payment system or an intermediary bank.
	<b>Book Entries -</b> This option refers to accounting/book entries and internal transfers involving a Cayman Islands bank or branch. However, do not involve the payment and settlement systems listed above.
	<b>Other -</b> This option refers to any payment and settlement systems or transactions other than the aforementioned options.
Reporting Periods	Every Quarter of each Year as follows:  Quarter 1: 1 January to 31 March Quarter 2: 1 April to 30 June Quarter 3: 1 July to 30 September Quarter 4: 1 October to 31 December

# 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.
			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.
			Where applicable, the number of clients / customers should only include those of the Cayman Islands branch.
			Total clients consist of natural persons and legal persons and arrangements.

		i	
1.1.2	2	Total Transactions for the reporting period.	Enter the total number of transactions conducted during the reporting period.  Where applicable, the total transactions should only include those of the Cayman Islands branch.
1.1.3	3	Total Value of Client Assets.	Enter the total value of client assets as at the end of the reporting period.  Where applicable, the total value of assets should only include those of the Cayman Islands branch.
2.1.1	4	Total value of funds received, broken down by originating country of payment.	Enter the total value of payments received from counterparties, during the reporting period, broken down by country of origin.
2.1.2	5	Total number of transactions received, broken down by origin of the country transaction.	Enter the total number of payments received from counterparties, during the reporting period, broken down by country of origin.
2.1.3	6	Total number of incoming transactions, broken down by payment type.	Enter the total number of payments received from counterparties, during the reporting period, broken down by the listed payment systems:  • SWIFT, FEDWIRE, CHAPS, BACS, CIPS, Faster Payments, GPS, OPICS, PEGA, RIPPLE  • Book Entries  • Other - forms of payment not listed above
2.1.4	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 outgoing payments to counterparties, during the reporting period, where the entity is the originator, broken down by destination country.
2.1.5	8	Total number of transactions transferred out, broken down by destination country of the transaction.	Enter the total number of outgoing payments transferred out to counterparties during the reporting period, where the entity is the originator, broken down by destination country.

2.1.6	9	Total number of outgoing transactions, broken down by payment type.	Enter the total number of outgoing payment transactions to counterparties during the reporting period, broken down by the listed payment system:  • SWIFT, FEDWIRE, CHAPS, BACS, CIPS, Faster Payments, GPS, OPICS, PEGA, RIPPLE  • Book Entry ONLY (Category 'B' Banks)  • Other - forms of payment not listed above
2.2.1	10	Does the entity 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.	Provide any comments or feedback. Enter 'N/A' if no comment.