



Cash Flows Return – Completion Guide: Banking

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31 January 2023	1.1	Updates to definitions, descriptions, and explanations
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1 May 2024	1.3	Updates to section 3.2 of the user guide
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Contents

1	Introduction	4
2	Form Information	4
3	Accessing and Submitting the Cash Flows Return.....	5
3.1	Access to the Cash Flows Return	5
3.2	Completing the Cash Flows Return	11
4	Other Useful Information	12
4.1	User Account Lockouts.....	12
4.2	Internet Browser.....	12
4.3	Two-Factor Authentication.....	12
4.4	Using Excel	13
4.5	Partial Or Incomplete Return Submissions.....	13
4.6	Data and Security	14
4.7	Applicable Fees	14
5	<i>Cash Flows Return Guidance</i>	14
5.1	Relevant Payments	14
5.2	Terms and Definitions.....	14
5.3	Return Completion Guide	16

1 INTRODUCTION

The Monetary Authority Act (2020 Revision) (the “**MAA**”) prescribes the principal functions of the Cayman Islands Monetary Authority (the “**Authority**”), including regulating and supervising financial services business carried on in or from within the Islands in accordance with the MAA and the regulatory laws, and monitoring compliance with the Anti-Money Laundering Regulations (2025 Revision) (the “**AMLRs**”) pursuant to Sections 6(1)(b)(i), and (ii) of the MAA, respectively. In addition, Section 6(2) of the MAA requires the Authority in performing its principal functions to, among other things, act in the best economic interest of the Islands and promote and maintain a sound financial system and grants it such ancillary powers as may be required to fulfil its functions. Ensuring that regulated entities comply with the AMLRs when providing financial services is therefore an important jurisdictional matter to ensure that the Cayman Islands remains a financial centre of choice and that the financial system within the Islands is one that is strong and trusted.

In order to obtain the information necessary to discharge its principal functions, particularly that of monitoring compliance with the AMLRs, the Authority periodically undertakes sectoral money laundering/terrorist financing/proliferation financing (ML/TF/PF) risk assessments as part of its risk-based approach to Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT) supervision of regulated financial service providers (“**FSPs**”). For the purposes of the risk assessment of the banking sector, the Authority distributes to, and requires FSPs holding a Category A, B, or Restricted B Bank licence (collectively, “**banking licensees**”) under the Banks and Trust Companies Act (2025 Revision) (“**BTCA**”) to submit a **Cash Flows Return** on a quarterly basis.

The Cash Flows Return provides the Authority with data relating to the cumulative inflows and outflows of the banking sector which the Authority uses to analyse, model, and assess 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 “**AML**D”), within sixty (60) days after distribution by the Authority.

The Cash Flows Return is issued in accordance with Regulation 53A of the AMLRs, pursuant to which the Authority may require a FSP to provide any information that the Authority reasonably requires in connection with the exercise of its functions. Requiring banking licensees to provide the information by completing the Cash Flows Return – Banking Form is necessary to ensure that the Authority has the requisite information to perform its functions as outlined in Section 6 of the MAA, which includes the monitoring of compliance with the AMLRs. Additionally, in accordance with Section 17(3)(a) of the BTCA), the Authority is entitled at all reasonable times to have access to records of a licensee.

This Guide provides instructions and support to banking licensees for accessing, completing, and submitting the Cash Flows Return to AMLD.

Please note that in accordance with Regulation 53B(1) of the AMLRs, failure to provide the requested information may amount to a criminal offence pursuant to Regulation 56 of the AMLRs and/or result in the imposition of an administrative fine of up to \$1,000,000 for a corporate body or \$100,000 for an individual, pursuant to Sections 42A, and 42B(4) of the MAA.

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, internal bank transfers, and transfers to another institution, including group entities, 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 Return 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 Return. 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 AMLReturns@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. 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=YJa0JBU86VZVCBbBxmnm3fq3fSoAMoPYyQ6XKFqbx0MoYGkSpT5b5bDc%2B2cgghPO8d%2BUVVhbZktQht%2F4d2cbioYpsg%2Bjke0tE3GtLwMOBySoP%2Bk8rPURRSVrPSQ6JA5hgsaBaC6uvcZV4KB266HIFgh4FhAtaTNSa3IE3alA%3D>

For any questions concerning the survey or the current reporting cycle, please contact: 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

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.

**CAYMAN ISLANDS
MONETARY AUTHORITY**

Set Your Password

New Password *

Confirm

Password must meet the following requirements:

- ✗ At least one lower case letter
- ✗ At least one upper case letter
- ✗ At least one special character
- ✗ At least one number
- ✗ Be at least 8 characters
- ✗ Maximum length of 16 characters

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

**CAYMAN ISLANDS
MONETARY AUTHORITY**

Set Your Password

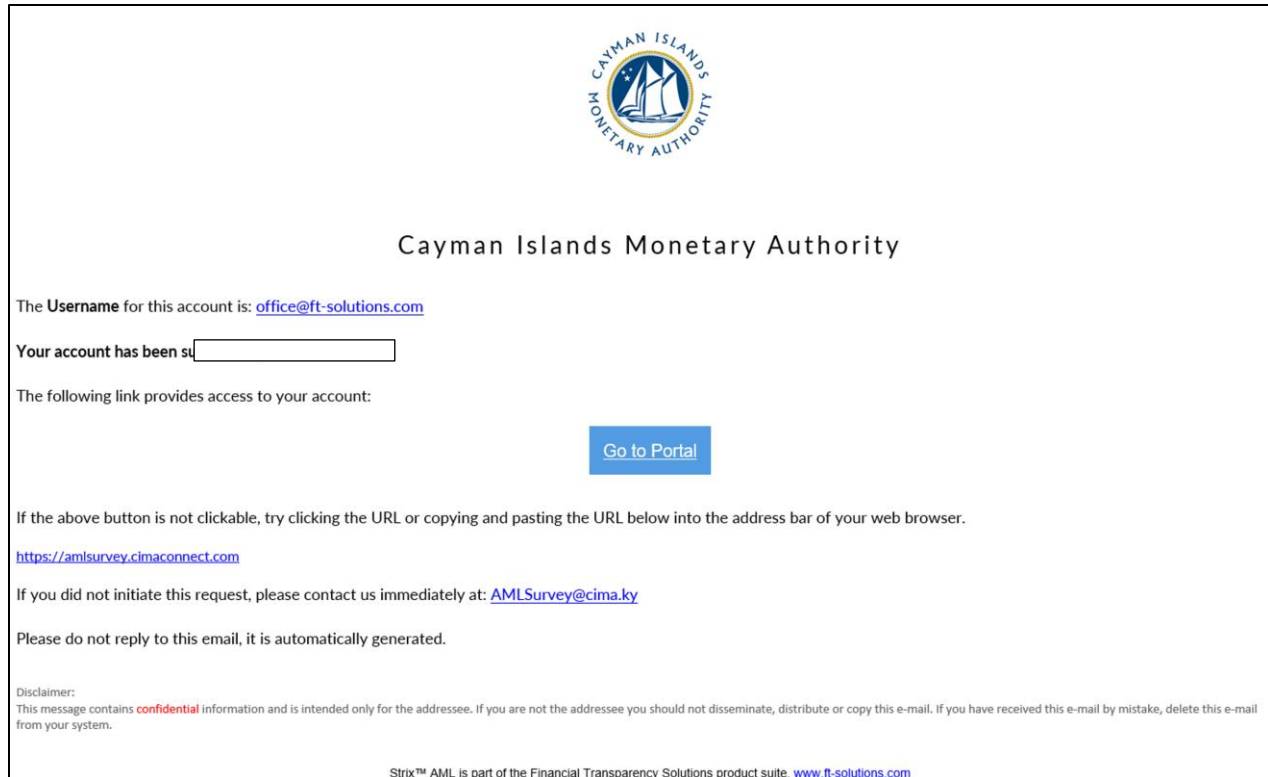
New Password *

Confirm Password *

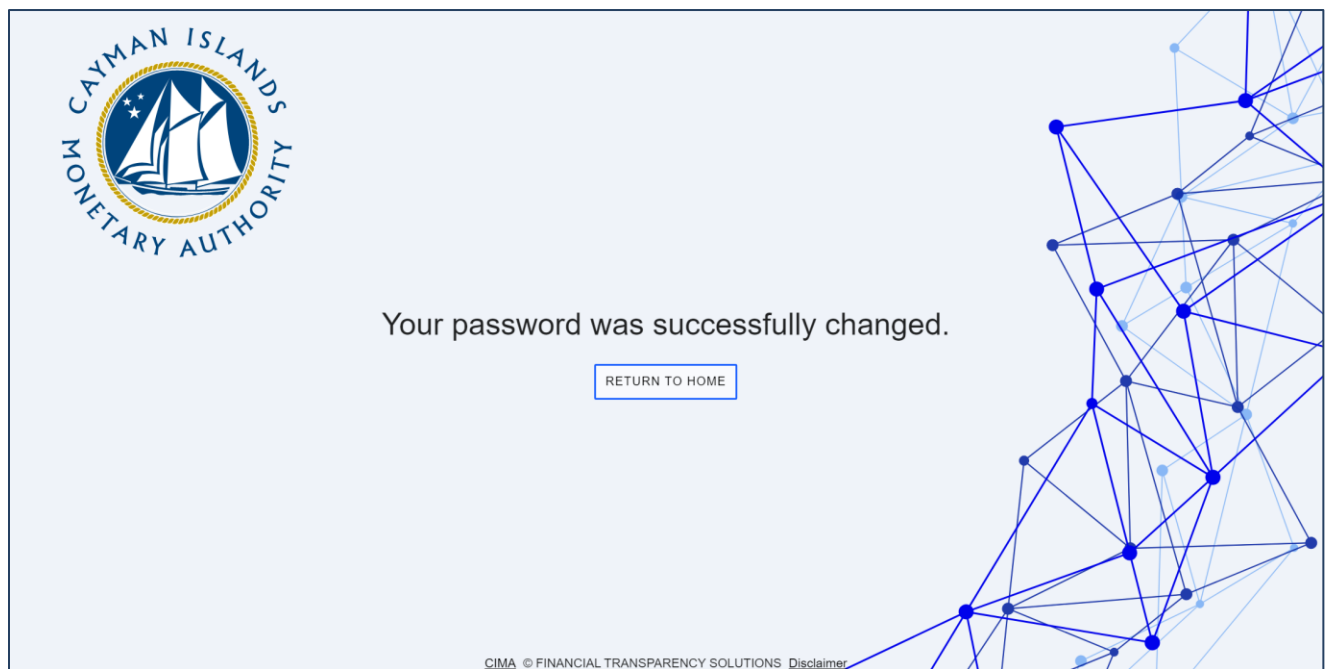
SUBMIT

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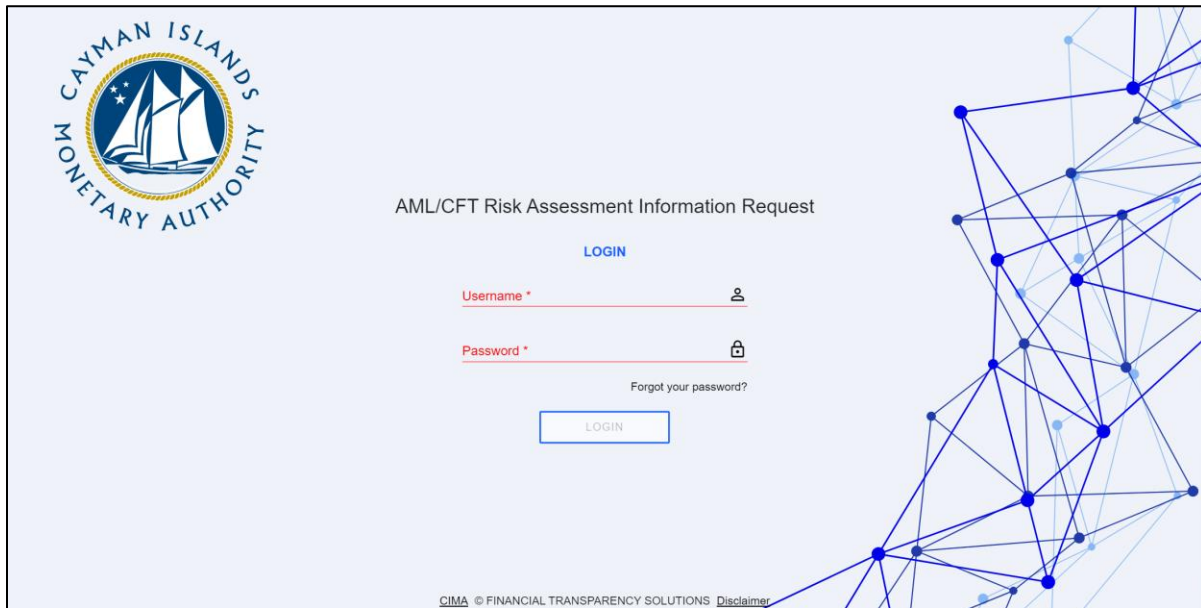
4. Once the recipient's password has been re-entered, and matches, they can submit and finish the activation process. An email "Notification of Successful Activation" will be sent providing a 'Go to Portal' link which can be used for all future access.



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.



CAYMAN ISLANDS
MONETARY AUTHORITY

AML/CFT Risk Assessment Information Request

LOGIN

Username *

Password *

Forgot your password?

LOGIN

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7. A six digit two-factor authentication code will be sent to the Return recipient's email address.



CAYMAN ISLANDS
MONETARY AUTHORITY

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:

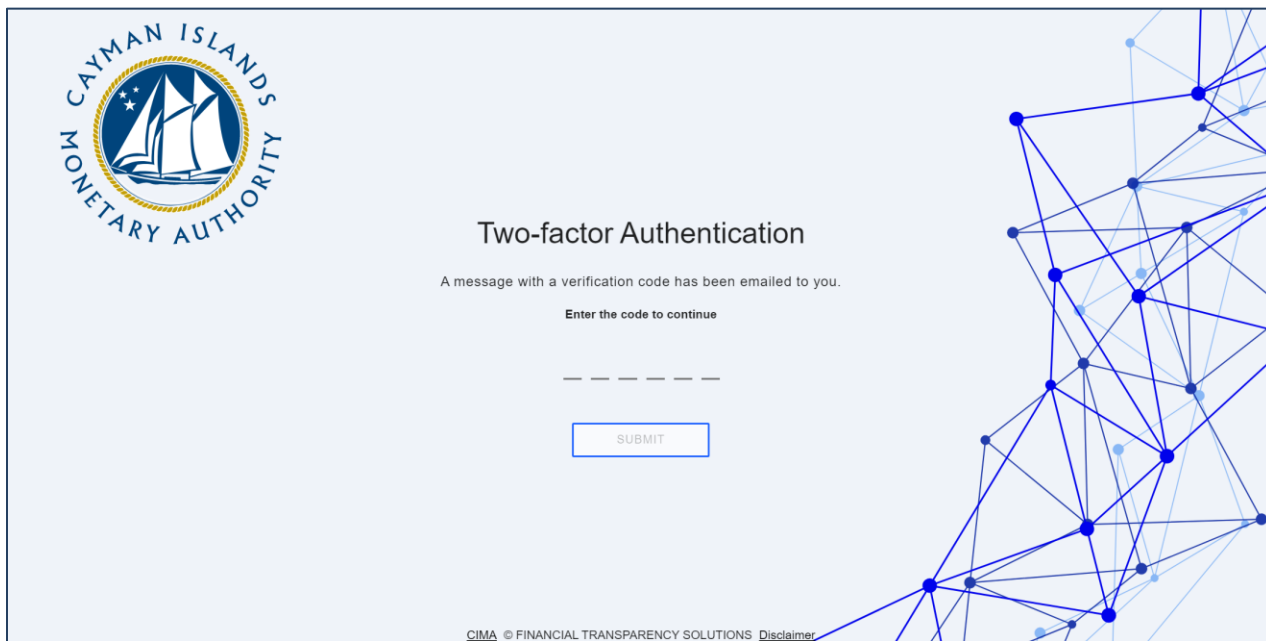
951247

If you did not initiate this request, please contact us immediately at: AMLSurvey@cima.ky

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

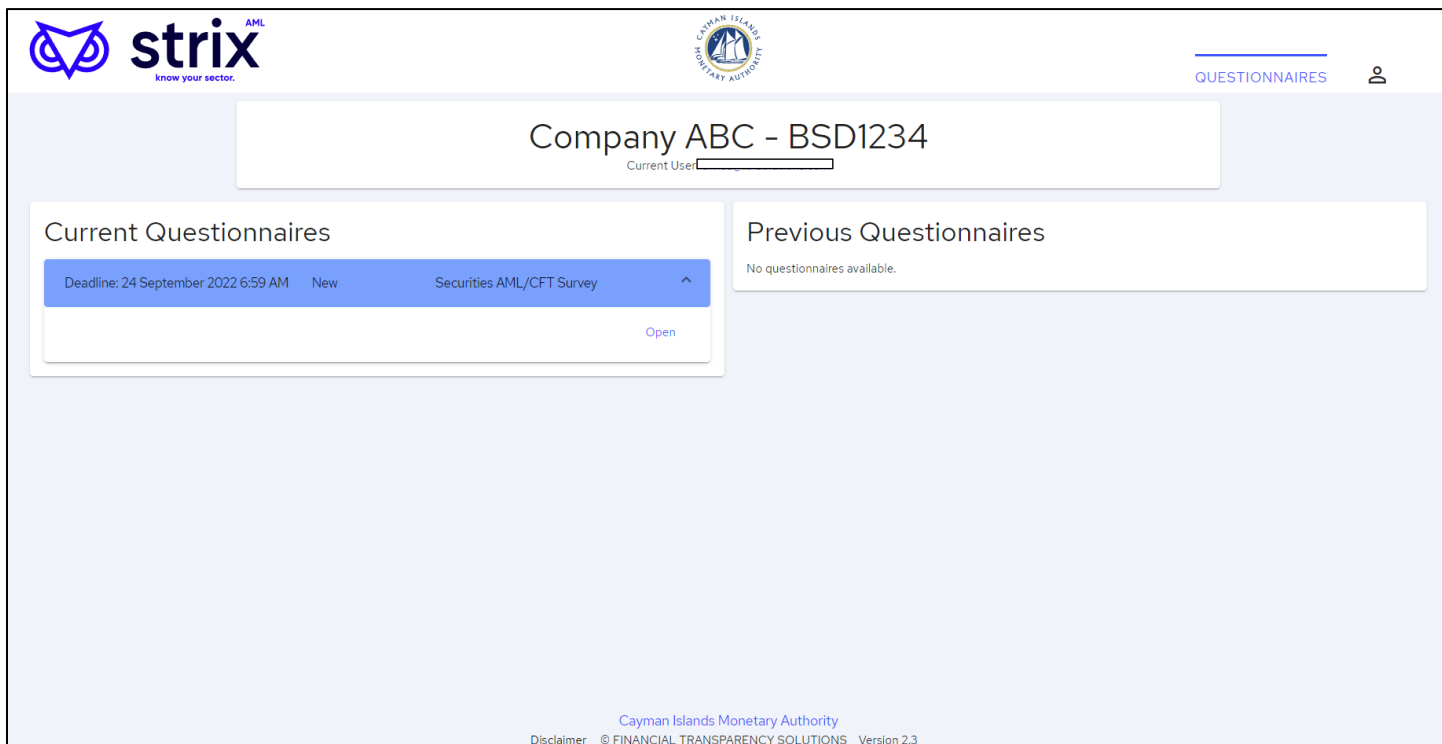
Disclaimer:
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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



The image shows a web page for Two-factor Authentication. On the left is the Cayman Islands Monetary Authority logo. The main heading is "Two-factor Authentication". Below it, a message states: "A message with a verification code has been emailed to you." The instruction "Enter the code to continue" is followed by a dashed line for the code input. A "SUBMIT" button is below the input field. On the right side of the page is a decorative graphic of a network of blue dots connected by lines. At the bottom, there is a small footer: "CIMA © FINANCIAL TRANSPARENCY SOLUTIONS Disclaimer".

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



The image shows a dashboard for "strix AML" with the tagline "know your sector." The top right features the Cayman Islands Monetary Authority logo, a "QUESTIONNAIRES" link, and a user icon. The main heading is "Company ABC - BSD1234" with a "Current User" dropdown below it. The dashboard is divided into two main sections: "Current Questionnaires" and "Previous Questionnaires".

Current Questionnaires

Deadline: 24 September 2022 6:59 AM	New	Securities AML/CFT Survey	
			Open

Previous Questionnaires

No questionnaires available.

At the bottom, there is a footer: "Cayman Islands Monetary Authority", "Disclaimer © FINANCIAL TRANSPARENCY SOLUTIONS", and "Version 2.3".

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 Return 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 Return 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 Return 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 AMLReturns@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 Return, they will see the additional Return(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.

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 AMLReturns@cima.ky 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.

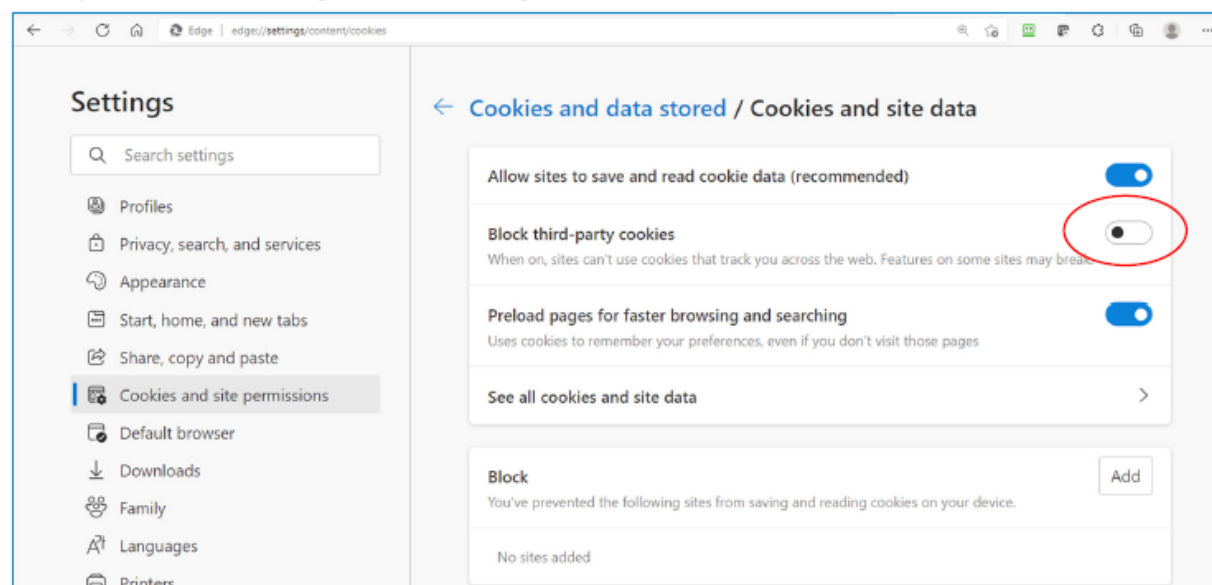
4.3 TWO-FACTOR AUTHENTICATION

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 AMLReturns@cima.ky.

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 AMLReturns@cima.ky:

- 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 USING EXCEL

The Strix portal allows you to copy two-column lists from an Excel document and paste the data directly into the Return. Given that there are several questions in the Return 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:

- 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.
- 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.
- Select 'Add' to upload the desired data into the Return 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.

4.5 PARTIAL OR INCOMPLETE RETURN SUBMISSIONS

Partial or incomplete submissions will only be permitted by the Authority under approved circumstances. Prior to submitting an 'Incomplete' AML Return, the Entity is required to submit a Request for Incomplete Submission to the Authority. Incomplete Submission Requests are to be submitted to AMLReturns@cima.ky detailing the following:

- Licence or Registration Name
- Licensed or Registration Number
- Date of Licence or Registration
- List of current directors
- Number of Clients
- Reason for requesting to make an Incomplete Submission.

4.6 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.

NOTE: The Authority encourages entities to save a copy of their submitted Cash Flow Return for their own record keeping purposes, since the Authority does not maintain copies of historical returns for supervised entities. Additionally, as per the Authority's data management policy, submissions for terminated entities will not be accessible to their authorised contacts within the Strix portal.

4.7 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 should only report payments, accounting/book entries and other 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 (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.
Country	

	The country of origin is the initial ordering country for payments received and/or booked by the reporting entity (inflows). 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 sent 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 Return	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.
Internal Bank Transfer	An internal bank transfer is the movement of funds between accounts held within the same entity. These transfers may occur between accounts owned by the same client/ customer or between accounts owned by different clients/ customers of the entity. Generally, a Bank's clients/ customers are made up of Natural Persons, Legal Persons, and Legal Arrangements.

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. Book Entries - 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. Other - 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: January 1 to March 31 Quarter 2: April 1 to June 30 Quarter 3: July 1 to September 30 Quarter 4: October 1 to December 31
Transaction	For the purposes of this form, a transaction is the movement of assets, whether it be between the client and the entity, the client account and a third party, or the entity on behalf of the client. Fees paid from an external source, other than the client account held by the entity, should be reported as a transaction. Fees paid from client accounts, held by the entity, along with payments made to governments for taxes associated with securities trades, should be excluded from the report.

5.3 RETURN 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.
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 (<i>Category 'B' Banks</i>) • 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.