



Completion Guide: VASP Travel Rule Return

Document version: 1.1

Revision History:

Effective Date	Version Number	Revision Description
27 January 2023	1.0	Initial release of document
30 October 2023	1.1	Updates to user guidance for excel functionality and user access and removing the threshold reporting value.

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1 INTRODUCTION

As part of its supervisory measures to detect and prevent money laundering, terrorist financing, proliferation financial (“ML/TF/PF”) in the Cayman Islands and globally, the Cayman Islands Monetary Authority (the “Authority”) distributes the Travel Rule Return to VASP Registrants on a quarterly basis. The VASP Travel Rule Return collects data relating to the originator and beneficiary details of transfers allowing the Authority to analyse the ML/TF/PF and sanctions risk exposures and increase transparency within the cryptoasset sector. Originating virtual asset service providers and beneficiary virtual asset service providers who engage in virtual asset transfers, with both retail and institutional customers, are required to collect, verify and share information about virtual asset transfers for transactions as set out in Part XA of the Virtual Asset Service Providers Act (2022 Revision).

Entities are required to provide the necessary data by completing the VASP Travel Rule Return and submitting it through the Authority’s web-based data collection software, STRIX, to the Anti-Money Laundering Division (the “AML”), within ten (10) days after distribution by the Authority. Manual submissions will not be accepted.

The VASP Travel Rule Return is issued in accordance with the section 9(5)(a) and (b) of the Virtual Asset (Service Providers) Act (2022 Revision).

2 FORM INFORMATION

The VASP Travel Rule Return is comprised of one (1) schedule and is intended for reporting relevant transfers or payments involving entities within the scope of application.

3 ACCESSING AND SUBMITTING THE VASP TRAVEL RULE RETURN

3.1 ACCESS TO THE VASP TRAVEL RULE RETURN


Entities will receive an invitation to the web-based survey 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 VASP Travel Rule Return: Registered Office contact, AMLCO, MLROs, DMLROs, 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.

To access the VASP Travel Rule Return:

1. When the VASP Travel Rule 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=YJa0JBLI86VZVCRbBxm3fq3fSoAMoPYyQ6XKFqtx0MoYgkSpT5b5bDc%2B2cgghPQ8d%2BUVVhbZktQht%2F4d2cbioYpsg%2BJke0tE3GtlwMObYSop%2Bk8rPURRSvrPSQt6JA5hgSaBaC6uvcZV4KB266HIFgh4FhAtaTNSa3IE3aiA%3D>

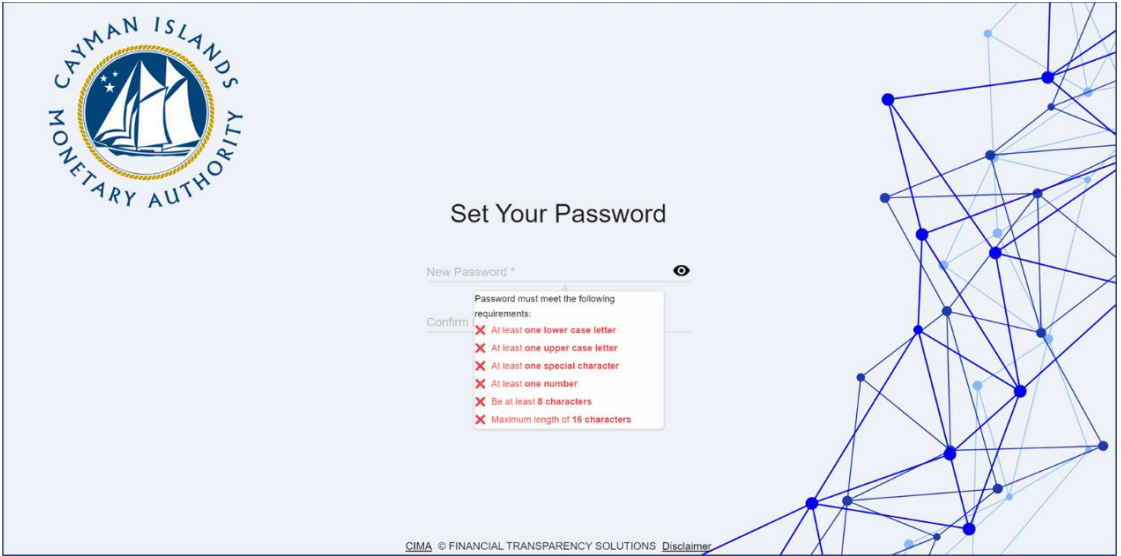
For any questions concerning the survey or the current reporting cycle, please contact: AMLSurvey@cima.ky

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

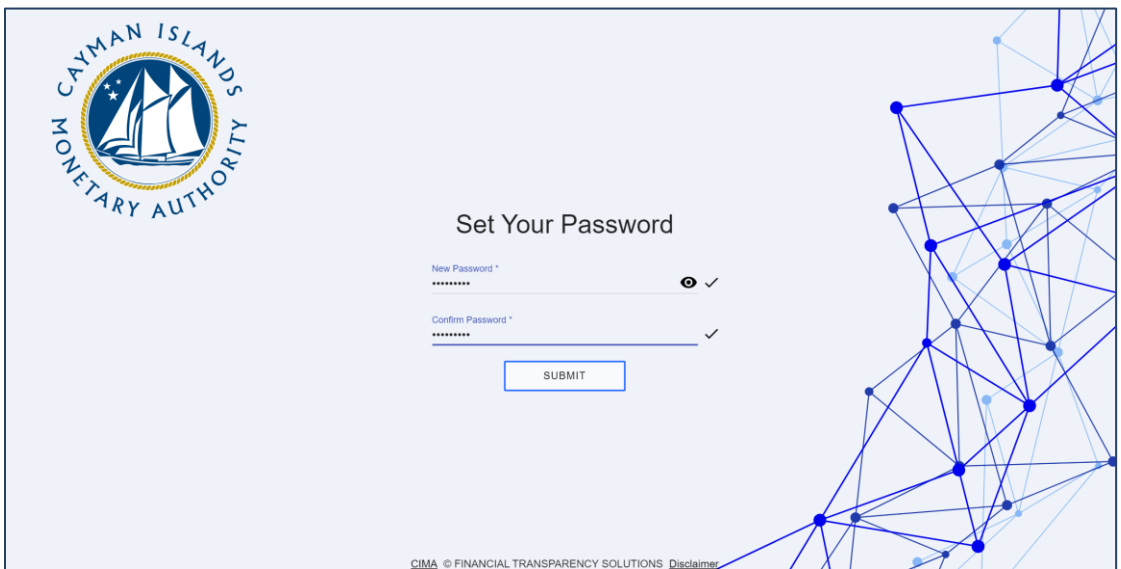
Disclaimer:
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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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

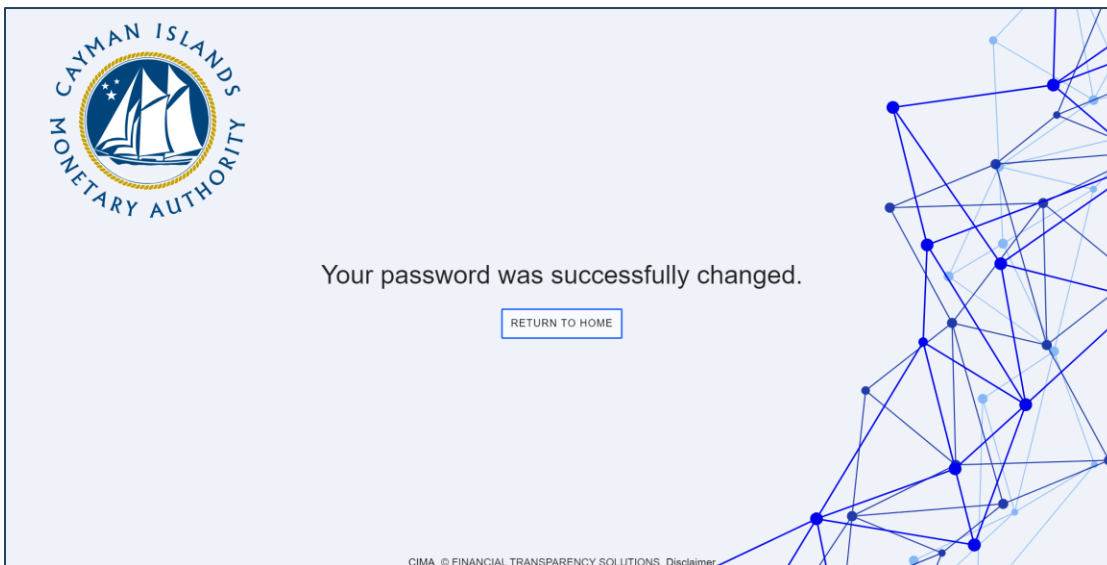
Please do not reply to this email, it is automatically generated.

Disclaimer:

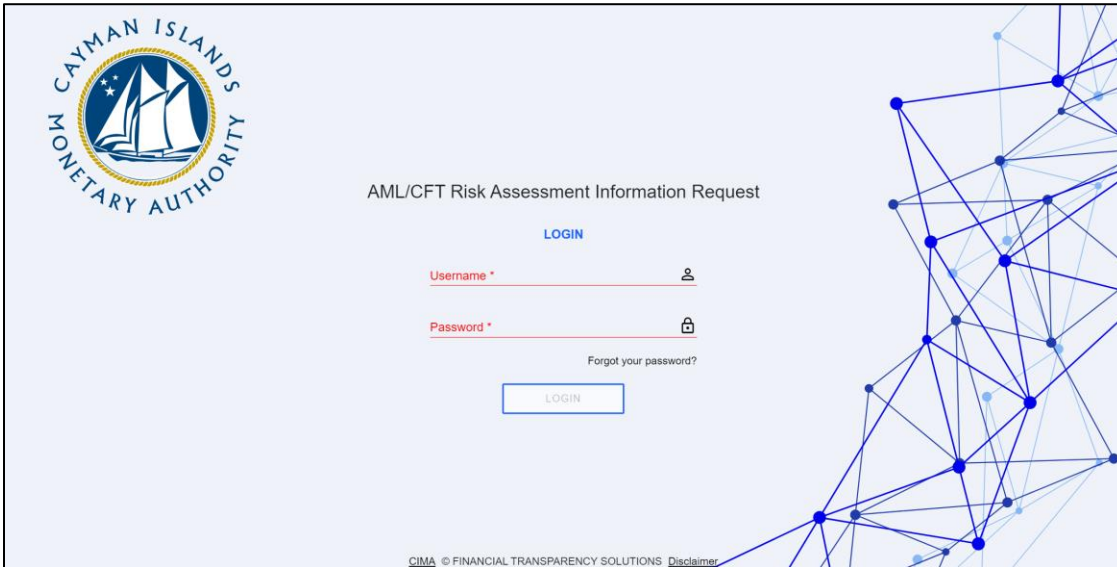
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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

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 VASP Travel Rule report invite, and the password they just created.



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



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:

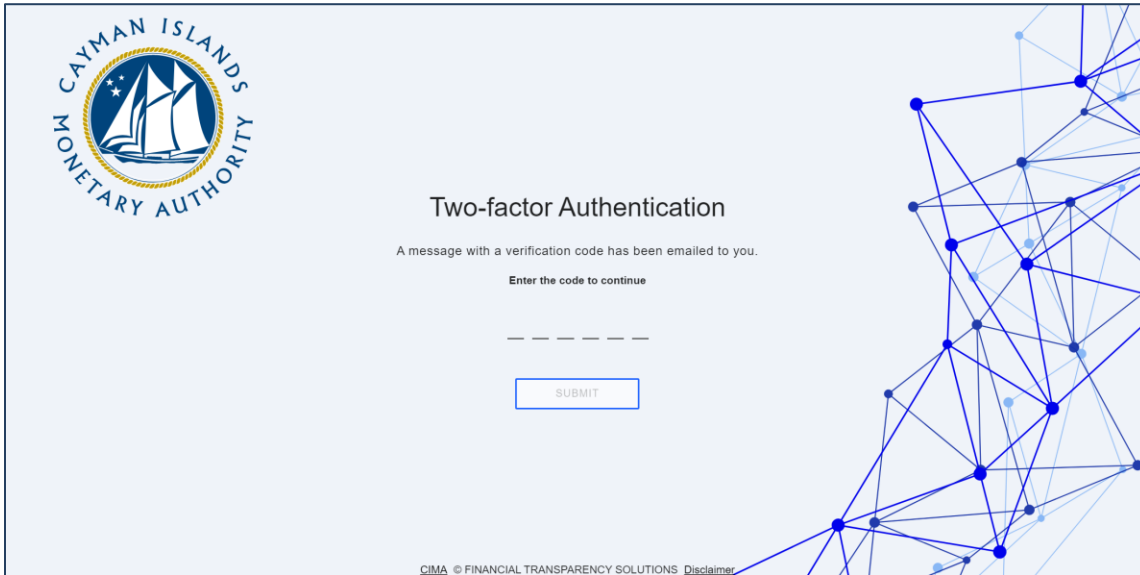
951247

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

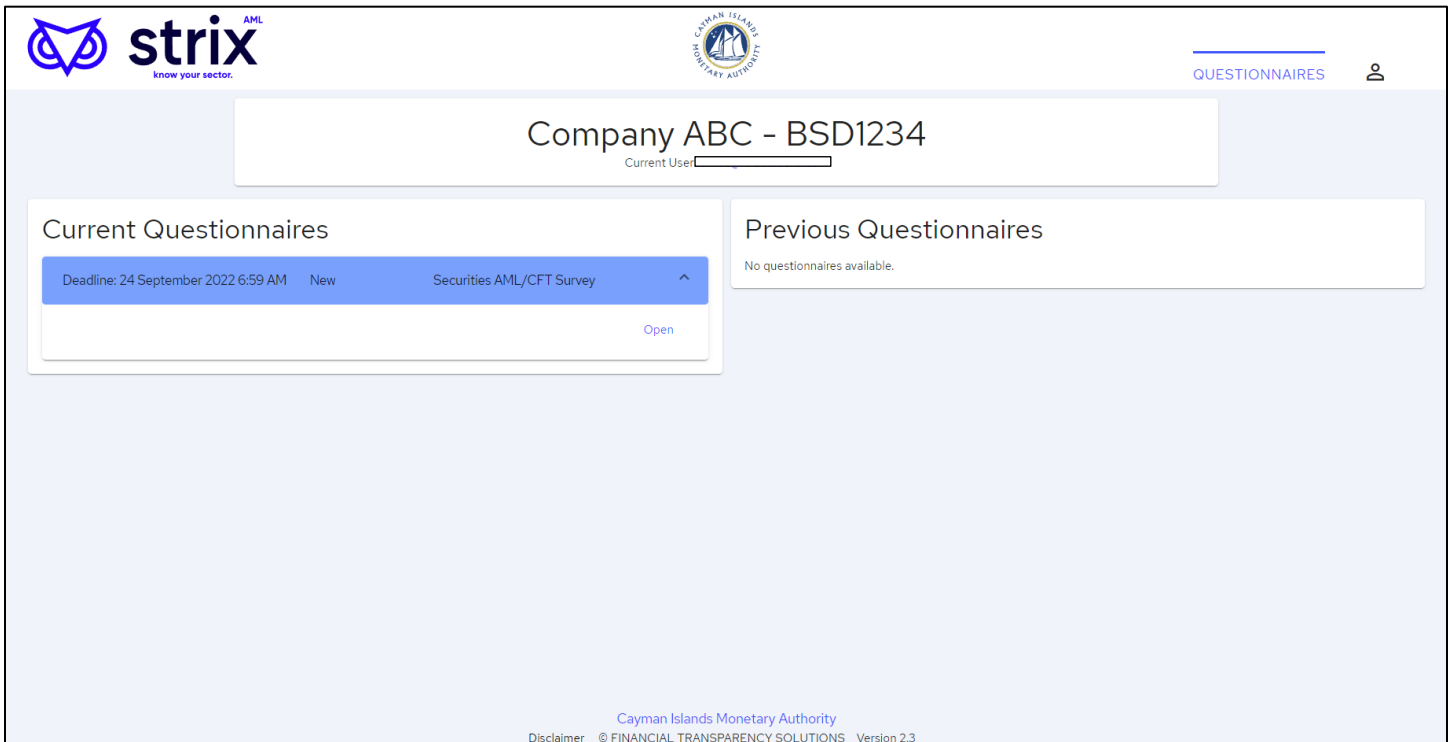
Please do not reply to this email, it is automatically generated.

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.



- 9. Click 'Open' to access the VASP Travel Rule 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 VASP TRAVEL RULE RETURN

1. Click the Current Questionnaire to access the VASP Travel Rule Return and start populating the form with the required data.
 - a. Completion guidance for the VASP Travel Rule Return is available at section 5 of this Guide below.
 - b. The recipient(s) can open, update, and close the VASP Travel Rule Return as many times as needed prior to the survey due date so long as the recipient selects 'Save'.
 - c. Once the VASP Travel Rule report 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 VASP Travel Rule 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 VASP Travel Rule Return will be conducted by a member of the AMLD, if information is missing or needs clarification the Authority will 'Reject' the VASP Travel Rule 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' VASP Travel Rule 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 detailing the following:
 - i. Licence or Registration Name
 - ii. Licence 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 VASP Travel Rule Return is to be completed quarterly and should be submitted through the STRIX portal ten (10) days after being distributed by the Authority.
2. If a user receives or has access to more than one survey, they will not see the additional survey(s) in the 'Current Surveys' section of the web page. At the top of the page, where it shows the Entity 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 EXPORTING AND SAVING THE FORM

Once the Entity enters and saves data in the Form it may be exported to Excel or PDF. Users should note that the Excel version cannot be re-uploaded into the STRIX software. Once the Form is submitted to the Authority through STRIX a pdf and Excel copy of their submission will be made available in the user's profile. Users are encouraged to download and save a copy for their records.

4.2 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 to request for re-activation of their account.

4.3 INTERNET BROWSER

Users should be aware that the VASP Travel Rule 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.

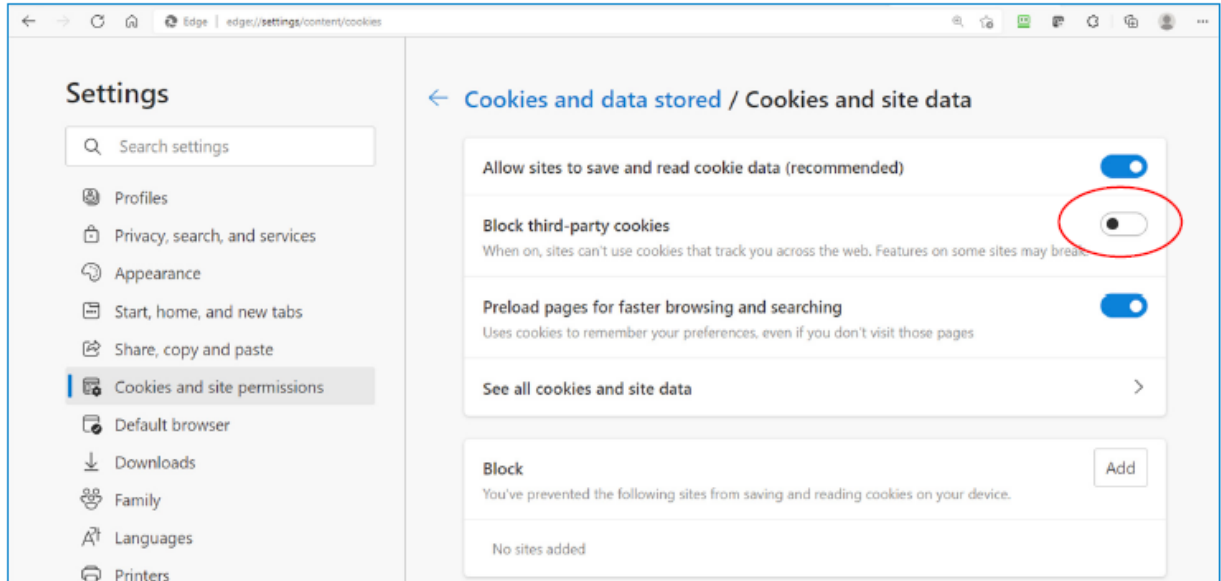
4.4 TWO-FACTOR AUTHENTICATION

Due to the security permissions around the two-factor authentication, the invite to the Travel Rule 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 AMLSurveys@cima.ky.

If an Entity's recipient is set up as a contact to the STRIX portal however they are not receiving their two-factor authentication code, they should attempt the following prior to contacting AMLSurveys@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:



4.5 DATA AND SECURITY

The VASP Travel Rule Return, the auto-generated communication from STRIX, and the data collected from FSPs in the VASP Travel Rule 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.

4.6 APPLICABLE FEES

There are no fees associated with this Form.

4.7 TERMS AND DEFINITIONS

Terms/Abbreviations	Definition/Meaning
AMLRs	Anti-Money Laundering Regulations (2023 Revision), as amended.
Beneficiary	<p>In relation to a transfer of virtual assets, means:</p> <ul style="list-style-type: none"> a) the client (natural person, legal person, or legal arrangement) that receives virtual assets that were transferred to a virtual asset service provider or directly to the client; or b) where the transfer is received by a virtual asset service provider on behalf of a client or other third party, the natural person, legal person, or legal arrangement that ultimately receives the transfer.
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.
Currency used for the Survey	<p>United States Dollars (US\$).</p> <p>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.</p>
Country	<p>The country of origin is the initial ordering country for transfers received and/or booked by the reporting entity.</p> <p>For example, if an entity in country Y initiates a transfer from its bank or another VASP in country X, then the country of origin is country X.</p> <p>For transfers sent and/or booked by the reporting entity, the end beneficiary country is the country where the end beneficiary's bank or another VASP is located.</p>
Legal Person or Arrangement	<p>"Legal person" means a company or other entity created by operation of law with separate legal personality.</p> <p>"Legal arrangement" means a trust or partnership, foundation or other entity created between parties which lacks separate legal personality.</p>

Natural Person	A human being, as distinguished from a company or other entity created by operation of law with separate legal personality.
Originator	In relation to a transfer of virtual assets, means: <ul style="list-style-type: none"> a) the client (natural person, legal person, or legal arrangement) that places an order with the virtual asset service provider for the virtual asset transfer; or b) where the transfer is carried out by a virtual asset service provider on behalf of a client or third party who owned the virtual asset immediately before the transfer.
Reporting Periods	Every Quarter of each Year as follows: <ul style="list-style-type: none"> 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

4.8 SURVEY COMPLETION GUIDE

Ref. No.	Question No.	Question	Description/Explanation
1.1.1	1	Has the Entity conducted any transfers of virtual assets that involved another VASP, unhosted wallet or onchain activity, during the reporting period?	Please respond 'Yes' or 'No' as applicable.
1.1.2	2	Did the Entity conduct 'first-party' transactions only during the reporting period?	Please respond 'Yes' or 'No' as applicable.
1.2.1	3	Total Clients / Customers during the reporting period.	Enter the total number of clients the entity conducted business with during the reporting period. Where applicable, the number of Clients /Customers should only

			<p>include those of the Cayman Islands legal entity.</p> <p>Total clients consist of natural persons and legal persons and arrangements.</p>
1.2.2	4	Total Transactions for the reporting period.	<p>Enter the total number of all Transactions conducted for clients <i>during</i> the reporting period.</p> <p>Where applicable, the Total Transactions should only include those of the Cayman Islands legal entity.</p>
1.2.3	5	Total Value of Transactions processed during the reporting period.	<p>Enter the total Value of Transactions processed for clients <i>during</i> the reporting period.</p> <p>Where applicable, the Total Value of Transactions should only include those of the Cayman Islands legal entity.</p>
1.3.1	6	Do you have any comments or feedback for this tab?	Please select 'Yes' or 'No'.
1.3.2	7	Please use this area to provide any comments or feedback for this tab.	If 'Yes' to Q6, please input any comments or feedback for this tab.
2.1.1	8	Number of <u>all</u> outgoing Transactions from an Originator client, for the reporting period, broken down by the transaction destination country.	<p>Enter the total number of <u>all</u> transactions transferred out (by or on behalf of clients), during the reporting period, where the entity is the Originator.</p> <p><i>Refer to section 3.2(3) above for detail on how to respond to this question using Excel.</i></p>
2.1.2	9	Total value of <u>all</u> outgoing Transactions from an Originator client for the reporting period, broken down by the transaction destination country.	<p>Enter the total value of <u>all</u> transactions transferred out (by or on behalf of clients), during the reporting period, where the entity is the Originator.</p> <p><i>Refer to section 3.2(3) above for detail on how to respond to this question using Excel.</i></p>
2.1.3	10	Number of <u>all</u> incoming Transfers to a Beneficiary client for the reporting period, broken down by Country of origin.	Enter the total number of <u>all</u> incoming transfers received by beneficiary clients, during the reporting period, broken down by country of origin.

			<i>Refer to section 3.2(3) above for detail on how to respond to this question using Excel.</i>
2.1.4	11	Total value of <u>all</u> incoming Transfers to a Beneficiary client for the reporting period, broken down by Country of origin.	Enter the total value of <u>all</u> incoming transfers received by beneficiary clients, during the reporting period, broken down by country of origin. <i>Refer to section 3.2(3) above for detail on how to respond to this question using Excel.</i>
2.1.5	12	Number of transactions not executed due to incomplete / insufficient CDD, during the reporting period.	Enter the total number of incoming and outgoing transactions not executed due to incomplete client due diligence "CDD" on either the Originator or Beneficiary, during the reporting period.
2.1.6	13	Total number of incoming transactions rejected due to insufficient applicant for business or beneficiary information.	The number of incoming transactions the entity declined to process, during the reporting period, due to insufficient CDD information on an applicant for business or beneficiary.
2.1.7	14	Total value of incoming funds rejected due to insufficient applicant for business or beneficiary information.	The value of incoming funds the entity declined to process, during the reporting period, due to insufficient CDD information on an applicant for business or beneficiary.
2.1.8	15	Total number of outgoing transactions rejected due to insufficient applicant for business or beneficiary information.	The number of outgoing transactions the entity declined to process, during the reporting period, due to insufficient CDD information on an applicant for business or beneficiary.
2.1.9	16	Total value of outgoing funds rejected due to insufficient applicant for business or beneficiary information.	The value of outgoing funds the entity declined to process, during the reporting period, due to insufficient CDD information on an applicant for business or beneficiary.
2.1.10	17	Total number of prospective client business relationships that were declined due to ML/TF/PF or sanctions concerns, during the reporting period.	The number of potential new client relationships that were declined, during the reporting period, because of ML/TF/PF or sanctions concerns, during the reporting period. ML/TF concerns are known events or red flags that may be raised. Known events include lack of CDD, the potential client behaviour such as unwillingness to provide requested documentation. Red flags

			include adverse hits generated through screening of potential clients via both internal systems and/or external databases. Note: These examples are not exhaustive.
2.1.11	18	Total number of blocked/rejected client transactions (both incoming and outgoing) due to ML/TF/PF or sanctions concerns during the reporting period.	Total number of transactions (both incoming and outgoing) the entity stopped or declined, during the reporting period, due to ML/TF/PF or sanctions concerns. ML/TF concerns are known events or red flags that may be raised. Known events include lack of CDD, client behaviour such as unwillingness to provide requested documentation. Red flags include adverse hits generated through ongoing transaction monitoring and routine screening of remitters and beneficiary clients via both internal systems and/or external databases. Note: These examples are not exhaustive.
2.1.12	19	Total number of client business relationships that have been terminated due to ML/TF/PF or sanctions concerns during the reporting period.	The number of client business relationships the entity terminated, during the reporting period, due to ML/TF/PF or sanctions concerns. ML/TF concerns are known events or red flags that may be raised. Known events include lack of CDD, the client behaviour such as unwillingness to provide requested documentation. Red flags include adverse hits generated through screening of existing clients via both internal systems and/or external databases. Note: These examples are not exhaustive.
2.2.1	20	Do you have any comments or feedback for this tab?	Please select 'Yes' or 'No'.
2.2.2	21	Please use this area to provide any comments or feedback for this tab.	If 'Yes' to Q20, please input any comments or feedback for this tab.