



Updated goAML Indicators

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Introduction

As communicated in its news release on the 6th of August 2024, the Financial Intelligence Analysis Unit (FIAU) will be upgrading goAML to a newer version. Among other additions, the upgrade consists of an updated list of indicators which reporting entities are required to use when submitting reports on goAML. This enhancement is designed to introduce a more streamlined approach to reporting, facilitating better statistical extraction and analysis of data. The updated list of indicators will be made available as part of the goAML system update, which is scheduled for release on 27th December 2024. Several changes have been made to the list of indicators whereby indicators have been added, renamed or removed. These changes aim to improve the efficiency and effectiveness of the reporting process, ensuring that information is captured in a more structured and consistent manner.



Indicator Categories

The updated version of goAML will introduce a new feature of categorisation of indicators, which will enable reporting entities to filter through the list of indicators. Currently, the FIAU has been using indicator codes to distinguish between various types of indicators. However, this new feature, will introduce a new method to categorise indicators. Reporting entities submitting reports through the web portal will now encounter an additional column when selecting the appropriate report indicators, as shown in 'figure 1' below:

<input type="checkbox"/>	Code ↑	Indicator	Categories

Figure 1: Updated indicators table with the 'Categories' column

By way of example, the FIAU referred to the 'reason for suspicion (RS)', 'report indicator (RI)', and 'report tag (RT)' subcategories in previous publications. These terms will no longer be used since the RS indicators will be split between those related to the account usage (including any transactions carried out) and those related to the customer. Through this new method, subject persons will be able to filter through the different categories of indicators when selecting the relevant indicators. The indicator codes will therefore no longer be used to differentiate between the aforementioned indicators. Rather, the indicator categories will be used instead.



The newly revised categories that will appear in the 'category' column are as follows:

Category	Description
Amount Indicators	The reporting entity should select the range of funds at risk of money laundering or funding of terrorism.
Internal Indicators	These indicators mainly relate to internal and/or administrative processes. The reporting entities should select either of these indicators whenever applicable.
Predicate Offence Indicators	The reporting entity should select any applicable predicate offence/s.
Product Indicators	Any products/services used in the perpetration of the underlying crime or that were relevant to the suspicion should be selected.
Reason for suspicion (RS): Account Usage	This category contains a list of reasons for suspicion that relate to the account and/or the transactions carried out within the suspected account.
Reason for suspicion (RS): Customer	This category contains a list of reasons for suspicion that relate to the involved persons/entities.



Notable Changes

One should also note that a number of indicators have been removed due to the introduction of newer processes.

- Politically Exposed Person (PEP) related indicators have been disabled. Reporting persons are now required to complete the respective fields in their report whenever a PEP is identified.
- The indicator bearing code 'RT-33' reading 'Call for Action: High-Risk Jurisdictions subject to a Call for Action' will be disabled since new report types will be introduced for such instances. Further guidance on this matter will be made available.
- The jurisdictional connections (Domestic, EU/EEA, Non-EU/EEA) that reporting entities were encouraged to select when choosing the respective product indicators will no longer be available. Instead, only the product itself will require selection, irrespective of the jurisdiction. The FIAU would however like to remind all reporting entities that any details relating to the jurisdictional connections of persons, accounts or entities should be populated in the respective fields in line with the Schema. One should note that these fields are already available in the current goAML version.
- The indicator bearing code 'Internal-09' which reads 'Cash restriction - EUR 10k breach' will be disabled since its use will no longer be necessary due to the introduction of new procedures and policies.

List of Indicators

Category	Indic Code	Indicator Description
Amount	Amount-01	EUR 0-10,000
Amount	Amount-02	EUR 10,001-50,000
Amount	Amount-03	EUR 50,001-100,000
Amount	Amount-04	EUR 100,001-500,000
Amount	Amount-05	EUR 500,001-1,000,000
Amount	Amount-06	EUR 1,000,001-5,000,000
Amount	Amount-07	EUR 5,000,001-10,000,000
Amount	Amount-08	EUR 10,000,001-50,000,000
Amount	Amount-09	EUR 50,000,001 and over
Amount	Amount-10	Amount not specified/ not available
Internal	Internal-10	Subject person disseminated intelligence to foreign counterparts
Internal	Internal-27	Project Defunct I - 2020
Internal	Internal-28	Project Defunct II - 2021

Category	Indic Code	Indicator Description
Internal	Internal-29	Project Defunct III - 2022
Internal	Internal-30	Project Defunct IV - 2023
Predicate Offence	PO-1	Corruption and bribery
Predicate Offence	PO-10	Illicit trafficking in narcotic drugs and psychotropic substances
Predicate Offence	PO-11	Illicit trafficking in stolen and other goods
Predicate Offence	PO-12	Insider trading and market manipulation
Predicate Offence	PO-13	Kidnapping, illegal restraint and hostage-taking
Predicate Offence	PO-14	Murder, grievous bodily injury
Predicate Offence	PO-151	Participation in an international organised criminal group and racketeering
Predicate Offence	PO-152	Participation in a domestic organised criminal group and racketeering
Predicate Offence	PO-16	Counterfeiting and piracy of products
Predicate Offence	PO-161	Piracy (Example: Piracy at sea)
Predicate Offence	PO-18	Robbery or theft
Predicate Offence	PO-19	Trafficking in Human Beings - Sexual exploitation (excluding minors)
Predicate Offence	PO-191	Trafficking in Human Beings - Child Sexual Exploitation

Category	Indic Code	Indicator Description
Predicate Offence	PO-2	Unknown - Predicate Offence could not be established
Predicate Offence	PO-20	Smuggling (including in relation to customs and excise duties and taxes)
Predicate Offence	PO-211	Tax crimes: Corporate Income tax
Predicate Offence	PO-212	Tax crimes: Personal Income tax
Predicate Offence	PO-213	Tax crimes: Other indirect taxes (Excise duty, Import Duties, Stamp Duty, Green Taxes)
Predicate Offence	PO-214	Tax crimes: VAT Fraud
Predicate Offence	PO-215	Tax crimes: Other direct taxes (example: Property tax, Inheritance tax, Capital Gains tax, etc.)
Predicate Offence	PO-22	Terrorism, including terrorist financing
Predicate Offence	PO-222	Targeted Financial Sanctions
Predicate Offence	PO-223	Proliferation Financing (including dual-use goods)
Predicate Offence	PO-227	Terrorism: Left-wing extremism (Anarchists, Environmental & Animal Rights extremists, Anti-fascist)
Predicate Offence	PO-228	Terrorism: Radical Islamic terrorism (Extremist religious ideologies)
Predicate Offence	PO-229	Terrorism: Right-wing extremism (White Supremacists, Anti-government, Anti-immigration, Neo-Nazi)
Predicate Offence	PO-231	Migrant smuggling

Category	Indic Code	Indicator Description
Predicate Offence	PO-232	Trafficking in Human Beings - Forced Labour
Predicate Offence	PO-233	Trafficking in Human Beings - Organ Removal
Predicate Offence	PO-24	Usury
Predicate Offence	PO-25	Living off the earnings of prostitution and/or running a brothel
Predicate Offence	PO-26	Illicit arms trade
Predicate Offence	PO-27	Prostitution and solicitation
Predicate Offence	PO-28	Cybercrime
Predicate Offence	PO-3	Counterfeiting currency
Predicate Offence	PO-35	Embezzlement/ Misappropriation of funds
Predicate Offence	PO-36	Conducting a regulated activity without an adequate licence to do so (illegal gambling, underground banking, cheques, hawala, etc.)
Predicate Offence	PO-37	Match-fixing
Predicate Offence	PO-4	Environmental crime
Predicate Offence	PO-5	Extortion
Predicate Offence	PO-6	Forgery
Predicate Offence	PO-718	Fraud

Category	Indic Code	Indicator Description
Product	Prod-11	Debit/Credit Cards
Product	Prod-111	Cash
Product	Prod-112	ATM
Product	Prod-14	e-Money Accounts
Product	Prod-17	Payment services
Product	Prod-20	Money remittance services
Product	Prod-22	Acquiring/Merchant Services
Product	Prod-24	Loans: External finance (Including: Bank Loans)
Product	Prod-26	Table Games
Product	Prod-27	Gaming Machines
Product	Prod-30	Random number games
Product	Prod-34	Sports Betting
Product	Prod-36	Cryptocurrency
Product	Prod-42	Crypto mixers/tumblers
Product	Prod-44	Prepaid Cards

Category	Indic Code	Indicator Description
Product	Prod-46	Voluntary Organisations
Product	Prod-49	Foundations
Product	Prod-5	Bank Accounts
Product	Prod-52	Immovable Property: Domestic
Product	Prod-53	Immovable Property: EU/EEA
Product	Prod-54	Immovable Property: Non EU/EEA
Product	Prod-55	Company Formation
Product	Prod-56	Directorship/company secretary services
Product	Prod-57	Provision of registered office, business or correspondence address for businesses
Product	Prod-58	Tax Advice
Product	Prod-59	Accounting/Audit Services
Product	Prod-60	Trusts
Product	Prod-63	Investment products
Product	Prod-67	Cheques (Including Bank Draft)
Product	Prod-68	Precious metals/stones and/or other high value goods

Category	Indic Code	Indicator Description
Product	Prod-69	Nominee Shareholding
Product	Prod-71	Fiduciary Services
Product	Prod-72	Crowdfunding
Product	Prod-73	High Value Moveable Assets
Product	Prod-74	Holding Company
Product	Prod-75	Life insurance/assurance products
Product	Prod-76	Loans: BO/Shareholder
Product	Prod-77	Loans: Company-to-company
Product	Prod-78	Safe Deposit Boxes
Product	Prod-79	Shell Company/ies
Product	Prod-80	Trading Company
Product	Prod-9	Virtual IBANs
RS - Account Usage	Ri-02	€2,000 gaming threshold not met
RS - Account Usage	RS-10	Loans secured with assets held by third parties, unrelated to the borrower
RS - Account Usage	RS-111	Unnecessarily Complex Series of Transactions

Category	Indic Code	Indicator Description
RS – Account Usage	RS-17	Abnormal flight ticket purchases
RS – Account Usage	RS-26	Transactional activity is unexplained or is inconsistent with known customer profile
RS – Account Usage	RS-30	Withdrawal of money from foreign jurisdictions not in line with the customer's known profile or without apparent economic sense
RS – Account Usage	RS-34	Funnelling/Channelling of funds
RS – Account Usage	RS-35	Exposure to the dark web
RS – Account Usage	RS-38	Different IP address/Masking IP address
RS – Account Usage	RS-39	Deposit, minimal activity and request for a withdrawal
RS – Account Usage	RS-4	Transacting with unrelated/suspicious parties
RS – Account Usage	RS-46	Linked Accounts/Collusion ring identified
RS – Account Usage	RS-47	Usage of several/multiple debit/credit cards in the name of third-parties
RS – Account Usage	RS-49	Trade based money laundering
RS – Account Usage	RS-5	Excessive or accelerated repayments of long term loans (especially in cash)
RS – Account Usage	RS-51	Chip Dumping
RS – Account Usage	RS-54	Merchant (E-commerce) non-delivery/ sub-par delivery of goods
RS – Account Usage	RS-55	Third party/endorsed cheques

Category	Indic Code	Indicator Description
RS - Account Usage	RS-56	Withdrawals not in line with the customer's known profile
RS - Account Usage	RS-7	Asset is sold shortly after being purchased
RS - Account Usage	RS-9	Deposits not in line with the customer's known profile
RS - Account Usage	RT-18	Cross-border transportation of cash
RS - Account Usage	RT-35	Chargebacks
RS - Account Usage	RT-36	Structuring/smurfing of transactions
RS - Customer	Ri-11	IIP - Malta Individual Investor Programme (before 2020)
RS - Customer	Ri-12	IIP - Malta Citizenship by Investment - Citizenship by Naturalisation for Exceptional Services by Direct Investment (from 2020)
RS - Customer	RS-1	Unnecessarily Complex Structure
RS - Customer	RS-2	Uncooperative Customer
RS - Customer	RS-23	Links to Adverse media
RS - Customer	RS-37	Beneficial owner concealment
RS - Customer	RS-40	Unknown SOF/SOW
RS - Customer	RS-45	Unexplained wealth

Category	Indic Code	Indicator Description
RS - Customer	RS-48	Legal person not filing required documents with authorities (e.g.: annual return, financial statements with MBR etc.)
RS - Customer	RS-50	Money Mule(s)
RS - Customer	RS-52	Money Laundering Standalone (including professional money launderers)
RS - Customer	RS-53	Identity theft
RS - Customer	RT-11	Customer was refused service/onboarding /occasional transaction due to ML/FT concerns (including attempted transactions)
RS - Customer	RT-13	Business relation was closed due to ML/FT concerns
RS - Customer	RT-23	Exposure to High Risk Jurisdiction
RS - Customer	RT-25	Cash-intensive undertaking
RS - Customer	RT-30	Company set up and liquidated soon after
RS - Customer	RT-38	IIP - Refused Investor Programs applicants (irrespective of the application year)

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