

# Guidance Document

## PTRs - UNDERSTANDING THE REGULATIONS

The New Zealand Financial Intelligence Unit

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## Overview

This document should be read in conjunction with the goAML Web Reporting Reference Guides and other relevant PTR documentation which are available from the Resource Library within goAML. To access the resource library, reporting entities will need to log into goAML and click on the question mark icon on the menu bar.

For further information regarding your reporting obligations, please contact your sector supervisor in the first instance.

## Purpose of Document

This document:

- is for reporting entities with reporting obligations in accordance with the Anti-Money Laundering and Countering Financing of Terrorism (Prescribed Transactions Reporting) Regulations 2016;
- is the property of New Zealand Police and is not for further dissemination; and
- should be read in conjunction with the relevant legislations and PTR supporting documentation.

This document does not:

- replace the requirements as stated in the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (the Act) or regulations;
- constitute as legal advice (from the New Zealand Police); or
- replace advice/guidance provided by a reporting entity's own representatives/advisors.

The information in this document is divided into two main sections – International Funds Transfers (IFTs) and Large Cash Transactions (LCTs).

## Version Control

Version Number	Description	Date
2.0	Minor adjustments to layout, grammar, and wording for clarity.	October 2021
1.5	<p>Updated to incorporate previously signalled feedback and learnings, including:</p> <ul style="list-style-type: none"> <li>• LCT and IFT definitions added</li> <li>• New section added – 2(i) the unique transaction reference number</li> <li>• Updated guidance added to: <ul style="list-style-type: none"> <li>○ 2(d) the mode of the transaction (i.e. wire transfer)</li> <li>○ 2(e) the type of funds</li> <li>○ 3(a)(i) the name of the beneficiary of the international wire transfer</li> <li>○ 3(b)(i) the name of the originator of the international wire transfer</li> <li>○ 3(b)(v) any other identifying information regarding the originator of the international wire transfer (as available)</li> <li>○ 4(1)(a) their name</li> <li>○ 4(1)(b) their account number or unique customer identifier</li> <li>○ 4(1)(h) any other identifying information regarding each customer party to the transaction</li> <li>○ 6(d) the type of funds (e.g. cash...)</li> <li>○ 6(g) the exchange rate (if applicable)</li> <li>○ 7(1)(a) their name</li> <li>○ 7(1)(b) their account number or unique customer identifier</li> <li>○ 7(1)(c) their date of birth (if applicable)</li> <li>○ 7(1)(d) their identification document number</li> <li>○ 7(1)(h) any other identifying information regarding each customer party to the transaction</li> </ul> </li> <li>• Formatting updates applied to 2(h) the exchange rate (if applicable)</li> </ul>	March 2018
1.4.1	Updated to align with new PTR regulations	October 2017
1.4	First issue	May 2017

## Contents

Overview .....	2
Purpose of Document.....	2
Version Control.....	3
International Funds Transfer and Large Cash Transaction (Definitions) .....	5
General Information .....	5
Definitions .....	5
Regulations Mapping.....	6
International Funds Transfers.....	6
Types of IFTs .....	6
PTR Section One: General Information .....	6
PTR Section Two: Transaction Details .....	7
PTR Section Three: Transaction Details in relation to Originator or Beneficiary.....	9
PTR Section Four: Customer Details .....	13
Large Cash Transactions.....	17
Types of LCTs .....	17
PTR Section Five: General Information .....	17
PTR Section Six: Transaction Details .....	18
PTR Section Seven: Customer Details .....	20
Appendix A.....	25
Regulations Mapping for Automated Reporting .....	25
3.1   Report.....	25
3.2   Transaction.....	25
3.41   t_from_my_client .....	25
3.42   t_from .....	27
3.51   t_to_my_client .....	28
3.52   t_to .....	29

## International Funds Transfer and Large Cash Transaction (Definitions)

For the purposes of Prescribed Transactions Reporting, an **International Funds Transfer** means:

A wire transfer of NZD\$1,000 or more where –

- At least one of the following institutions is in New Zealand:
  - The ordering institution;
  - The intermediary institution;
  - The beneficiary institution; and
- At least one of the following institutions is outside New Zealand:
  - The ordering institution;
  - The intermediary institution;
  - The beneficiary institution.

For the purposes of Prescribed Transactions Reporting, a **Large Cash Transaction** means:

A transaction in New Zealand involving the use of physical currency (coin and paper) of NZD\$10,000 or more.

## General Information

The following information has been categorised as “general” in nature and can apply to both International Funds Transfers and Large Cash Transactions.

### Definitions

The following definitions provide clarity for reporting entities regarding terms within the PTR regulations.

#### As Available

Regulations (4) Interpretation: “as available, in relation to any information to be disclosed by a reporting entity by these regulations, means any information in the possession of the reporting entity that is reasonably accessible from its records”.

#### If Applicable

‘If applicable’ means that in some circumstances, information will not need to be provided because it does not apply. The most common examples include:

- When Date of Birth is not required because the customer is not a natural person;
- When Middle Name is not required because the customer does not have a middle name; and
- When Foreign Currency information is not required because the transaction does not involve foreign currency.

Anything in the regulations where ‘as available’ does not apply to is deemed mandatory. This document will use the colour **blue** to identify the sections in the regulations that are mandatory. There will be some cases where information is mandatory but only ‘if applicable’ as can be seen in the examples above.

## Regulations Mapping

The goAML Data Schema (Dictionary) is more detailed than the PTR regulations, so we have put together a regulation mapping table in Appendix A of this document. This provides an extra level of detail in terms of what information the FIU requires under each section in the PTR regulations. Where appropriate, specific regulations mapping will be emphasised in **blue** boxes.

## International Funds Transfers

### Types of IFTs

International Funds Transfers (IFTs) can be categorised into two broad types: **Inward** IFTs and **Outward** IFTs.



When the value of the transaction, in New Zealand Dollars (NZD) is \$1,000 or more, the IFT must be reported to the FIU.

### PTR Section One: General Information

These requirements relate to the reporting entity submitting the IFT. Italicised text are words directly from the PTR regulations, whereas the rest is interpretive guidance to assist reporting entities with their compliance requirements, including some useful information in blue boxes, which specifically assists with what to do when reporting.

For the reporting entity –

1(a) *the name of the reporting entity*

The registered name of the reporting entity with the FIU.

1(b) *the business address of the reporting entity*

The registered business address of the reporting entity with the FIU.

1(c) *the name of the reporting entity's AML/CFT supervisor*

**When reporting:** goAML allows for a reporting entity ID number (rentity\_id, REID, organisation ID) to be submitted, which will be used as a proxy for requirements 1(a) and 1(b).

## PTR Section Two: Transaction Details

These requirements relate to IFTs and details of the actual transaction, rather than individuals or entities involved in a transaction.

For each transaction –

*2(a) the branch or location where the transaction took place in New Zealand (if relevant)*

Branch name or physical location where the transaction took place.

*2(b) the country where the transaction took place (if not New Zealand)*

Name of the overseas country.

*2(j) the branch or city or region where the transaction took place if not in New Zealand (as available)*

Branch name or physical location where the transaction took place.

*2(k) the Internet protocol address of the originator (as available)*

The IP address of the originator when conducting an internet banking transaction, along with the timestamp associated with it.

**When reporting:** Sections 2(a), 2(b) and 2(j) are covered by the transaction\_location free text field. Section 2(k) is covered by two fields relating to IP address: transmode\_comment (free text) and value\_date.

If the transaction took place in New Zealand (most likely an outward IFT), provide the branch name or the physical address, along with “New Zealand” at the end (e.g. 123 Sample Street, Wellington, New Zealand).

For inward IFTs, where SWIFT payment details are present (accessible), the following fields can be used in the sequence named:

- Use SWIFT field 52A (if present);
- If SWIFT field 52A is blank, use SWIFT field 52D; and
- If both SWIFT fields 52A and 52D are blank, use the Sender BIC.

*2(c) the date and time of transaction*

The time and date the transaction took place (i.e. initiated).

**When reporting:** If your systems do not reliably collect this information, or if various dates apply to the transaction, then select the processing date as a proxy.

*2(d) the mode of the transaction (i.e. wire transfer)*

The transaction mode or type. For IFTs, it will be one of the options in the blue box below.

**When reporting:** Section 2(d) is covered by the transmode\_code field which is based on a code table or drop-down menu. One of the following options would most likely be selected for IFTs:

1. [BA] Electronic transaction – Wire transfer; or
2. [BV] In branch/office – Wire transfer.

### *2(e) the type of funds*

The type of funds involved in the transaction, which includes the originating (payer) funds type and the beneficiary (payee) funds type.

**When reporting:** Section 2(e) is covered by the following fields:

- from\_funds\_code; and
- to\_funds\_code.

For IFTs, the [N] electronically held funds option should be selected on both the 'from' and 'to' of each transaction.

### *2(f) the amount in New Zealand dollars*

The New Zealand dollar amount for each transaction, including those that involve foreign currency.

### *2(g) the amount in foreign currency (if applicable)*

The amount of a foreign currency sent or received.

### *2(h) the exchange rate (if applicable)*

**When reporting:** Section 2(f) is covered by the amount\_local field which will always be in New Zealand dollars (NZD). For transactions only involving foreign currency, use the NZD exchange rate for that particular currency on the day that the transaction took place.

As per Part 1 Section 7 of the AML/CFT Act, if there is more than one rate of exchange on that date [the equivalent in New Zealand currency that can be], calculate the average of those rates.

Sections 2(g) and 2(h) are covered by the foreign\_currency\_code, foreign\_amount and foreign\_exchange\_rate fields. These are all part of an optional subnode called t\_foreign\_currency which applies to both the originating (payer) funds and the beneficiary (payee) funds – as follows:

- t\_from\_my\_client | from\_foreign\_currency > t\_to\_my\_client | to\_foreign\_currency OR
- t\_from\_my\_client | from\_foreign\_currency > t\_to | to\_foreign\_currency OR
- t\_from | from\_foreign\_currency > t\_to\_my\_client | to\_foreign\_currency OR
- t\_from | from\_foreign\_currency > t\_to | to\_foreign\_currency

Example: Customer A receives an inward IFT payment with GBP as the currency, so there may not be an NZD amount that can be readily reported.

### *2(i) the unique transaction reference number*

The unique reference or account number that is assigned to the international funds transfer.



## PTR Section Three: Transaction Details in relation to Originator or Beneficiary

These requirements relate to IFTs and generally refer to the details of the non-customer party, which will likely be the originator for inward IFTs and the beneficiary for outward IFTs.

For each transaction by international wire transfer –

*3(a) the information to be provided where the reporting entity's customer is the originator of the transaction (and not the information in paragraph (b)) is as follows:*

This section generally covers outward IFTs, where the customer is the originator.

*3(a)(i) the name of the beneficiary of the international wire transfer*

The full name of the beneficiary if they are a natural person. For entities, the name of that entity and, if possible, the 'legal name' of that entity.

**When reporting:** When the beneficiary is a natural person, section 3(a)(i) is covered by the following fields:

- t\_to | to\_person - first\_name - middle\_name - last\_name
- t\_to | to\_account | signatory | t\_person - first\_name - middle\_name - last\_name

For entities choosing to automate the submission of their PTRs, if there are issues converting a name text-string into a first, middle and last name – please do the following:

- first\_name – provide the first text string prior to the first 'space'
- last\_name – provide the entire string text for the name

If only initials and a last name are provided, place the initials in the first\_name field and the last name in the last\_name field.

In scenarios where:

- a reporting entity only has access to a non-customer name as one text string; or
- the name is not split into separate name component fields as part of normal processing; or
- the name cannot be split with a reasonably high level of confidence into first, middle and last name strings

Then report the full name in t\_person | first\_name and repeat the full name string in t\_person | last\_name.

When the beneficiary is an entity, section 3(a)(i) is covered by the following fields:

- t\_to | to\_entity
  - name
  - commercial\_name
- t\_to | to\_account | t\_entity
  - name
  - commercial\_name

If you have one entity name and you know that it is the legal 'trading as' name for the entity, supply this name in both fields above.

*3(a)(ii) the account number for the beneficiary of the international wire transfer*

The account number of the beneficiary or the unique reference that is assigned to the international wire transfer.

**When reporting:** Section 3(a)(ii) is covered by the following fields:

- t\_to | to\_account | account; and
- transaction | transaction number

It is possible to provide both these details for a particular transaction. The goAML system mandates that a transaction number is provided. For banks in particular, account numbers can be provided in either two or three digit suffix denotation.

If there is no account (and therefore, account number) associated with the transaction, then the t\_to | to\_person or t\_to | to\_entity nodes can be used.

*3(a)(iii) the country where the beneficiary account is held or the location of the beneficiary...*

The full name of the country relating to either the beneficiary account or beneficiary location.

*3(a)(iii) ...city or region (if available)*

The city or region relating to either the beneficiary account or beneficiary location.

*3(a)(iv) any other details of the location of the beneficiary account or beneficiary (as available)*

Other location details relating to the beneficiary that are not covered in section 3(a)(iii).

**When reporting:** Section 3(a)(iii) is covered by the following fields:

- t\_to | to\_country; and
- t\_to | to\_account | branch

There is a drop-down menu or look up table for to\_country. Some examples include:

1. [US] United States
2. [GB] United Kingdom
3. [CN] China

If the country relating to the beneficiary account differs to their location, then provide the location of the beneficiary. Section 3(a)(iv) is covered by the following fields:

- t\_to | to\_person | address OR
- t\_to | to\_entity | address

*3(a)(v) any other identifying information regarding the beneficiary of the international wire transfer (as available)*

Other identifying information regarding the beneficiary that is not covered in previous sections.

**When reporting:** When the beneficiary is a natural person section 3(a)(v) is covered by the following fields:

- |   |   |
|---|---|
| <ul style="list-style-type: none"><li>• t_to   to_person<ul style="list-style-type: none"><li>○ gender – birthdate</li><li>○ passport_number</li><li>○ passport_country</li><li>○ id_number</li><li>○ phones</li><li>○ email</li><li>○ identification</li></ul></li></ul> | <ul style="list-style-type: none"><li>• t_to   to_account   signatory   t_person<ul style="list-style-type: none"><li>○ gender</li><li>○ birthdate</li><li>○ passport_number</li><li>○ passport_country</li><li>○ id_number</li><li>○ phones</li><li>○ email</li><li>○ identification</li></ul></li></ul> |
|---|---|

For each transaction by international wire transfer –

*3(b) the information to be provided where the reporting entity's customer is the beneficiary of the international wire transfer (and not the information in paragraph (a)) is as follows:*

This section generally covers inward IFTs where the customer is the beneficiary.

*3(b)(i) the name of the originator of the international wire transfer*

The full name of the originator if they are a natural person. For entities, the name of that entity and, if possible, the 'legal name' of that entity.

When reporting: When the originator is a natural person, section 3(b)(i) is covered by the following fields:

- |  |  |
|--|--|
| <ul style="list-style-type: none"><li>• t_from   from_person<ul style="list-style-type: none"><li>○ first_name</li><li>○ middle_name</li><li>○ last_name</li></ul></li></ul> | <ul style="list-style-type: none"><li>• t_from   from_account   signatory   t_person<ul style="list-style-type: none"><li>○ first_name</li><li>○ middle_name</li><li>○ last_name</li></ul></li></ul> |
|--|--|

For entities choosing to automate the submission of their PTRs, if there are issues converting a name text-string into a first, middle and last name – please do the following:

- first\_name – provide the first text string prior to the first 'space'
- last\_name – provide the entire string text for the name

If only initials and a last name are provided, place the initials in the first\_name field and the last name in the last\_name field.

In scenarios where:

- a reporting entity only has access to a non-customer name as one text string; or
- the name is not split into separate name component fields as part of normal processing; or
- the name cannot be split with a reasonably high level of confidence into first, middle and last name strings

Then report the full name in t\_person | first\_name and repeat the full name string in t\_person | last\_name. When the originator is an entity, section 3(b)(i) is covered by the following fields:

- t\_from | from\_entity
  - name
  - commercial\_name
- t\_from | from\_account | t\_entity
  - name
  - commercial\_name

If you have one entity name and you know that it is the legal 'trading as' name for the entity, supply this name in both fields above.

*3(b)(ii) the account number for the originator of the international wire transfer*

The account number of the originator, or the unique reference that is assigned to the international wire transfer.

When reporting: Section 3(b)(ii) is covered by the following fields:

- t\_from | from\_account | account; and
- transaction | transactionnumber It is possible to provide both these details for a particular transaction.

The goAML system mandates that a transaction number is provided. For banks in particular, account numbers can be provided in either two- or three-digit suffix denotation.

If there is no account (and therefore, account number) associated with the transaction, then the t\_from | from\_person or t\_from | from\_entity nodes can be used.

*3(b)(iii) the country where the originator account is held or the originator is*

The full name of the country relating to either the originator account or originator location.

*3(b)(iv) any other details of the location of the beneficiary account or beneficiary (as available)*

Other location details relating to the originator that are not covered in section 3(b)(iii)

When reporting: Section 3(b)(iii) is covered by the following fields:

- t\_from | from\_country; and
- t\_from | from\_account | branch

There is a drop-down menu or look up table for from\_country.

Some examples include:

1. [US] United States
2. [GB] United Kingdom
3. [CN] China

If the country relating to the originator account differs to their location, then provide the location of the originator.

Section 3(b)(iv) is covered by the following fields:

- t\_from | from\_person | address OR
- t\_from | from\_entity | address

*3(b)(v) any other identifying information regarding the originator of the international wire transfer (as available)*

Other identifying information regarding the originator that is not covered in previous sections.

When reporting: When the originator is a natural person section 3(b)(v) is covered by the following fields:

- t\_from | from\_person
  - gender – birthdate
  - passport\_number
  - passport\_country
  - id\_number
  - phones
  - email
  - identification
- t\_from | from\_account | signatory | t\_person
  - gender
  - birthdate
  - passport\_number
  - passport\_country
  - id\_number
  - phones
  - email
  - identification

#### PTR Section Four: Customer Details

These requirements relate to IFTs and generally refer to the details of the customer party or parties, and anyone acting on behalf of a customer. This section covers scenarios where the customer(s) is/are the originator and/or beneficiary.

For each customer party to the transaction –

*4(1)(a) their name*

The full name of the customer, if they are a natural person. For entities, the name of that entity and, if possible, the 'legal name' of that entity.

When reporting: When the customer is a natural person, section 4(1)(a) is covered by the following fields:

- t\_to/from\_my\_client | to/from\_person
  - first\_name
  - middle\_name
  - last\_name
- t\_to/from\_my\_client | to/from\_account | signatory | t\_person
  - first\_name
  - middle\_name
  - last\_name

For entities choosing to automate the submission of their PTRs, if there are issues converting a name text-string into a first, middle and last name – please do the following:

- first\_name – provide the first text string prior to the first 'space'
- last\_name – provide the entire string text for the name

If only initials and a last name are provided, place the initials in the first\_name field and the last name in the last\_name field.

In scenarios where:

- the name is not split into separate name component fields as part of normal processing; or

- the name cannot be split with a reasonably high level of confidence into first, middle and last name strings

Then report the full name in t\_person | first\_name and repeat the full name string in t\_person | last\_name.

When the customer is an entity, section 4(1)(a) is covered by the following fields:

- t\_to/from\_my\_client | to/from\_entity
  - name
  - commercial\_name
- t\_to/from\_my\_client | to/from\_account | t\_entity
  - name
  - commercial\_name

If you have one entity name and you know that it is the legal 'trading as' name for the entity, supply this name in both fields above.

#### *4(1)(b) their account number or unique customer identifier*

The customer account number or unique internal reference number that is assigned to the customer.

When reporting: When the customer is a natural person, section 4(1)(b) is covered by the following fields:

- t\_to/from\_my\_client | to/from\_account | account
- t\_to/from\_my\_client | to/from\_account | client number

For banks in particular, account numbers can be supplied in either a two or three digit suffix denotation.

If there is no account (and therefore, account number) associated with the transaction, then one of the following nodes can be used:

- t\_to\_my\_client | to\_person/entity
- t\_from\_my\_client | from\_person/entity

#### *4(1)(c) their date of birth (if applicable)*

If the customer is a natural person, then their date of birth.

When reporting: Section 4(1)(c) is covered by the following fields:

- t\_to/from\_my\_client | to/from\_person |
  - birthdate
- t\_to/from\_my\_client | to/from\_account | signatory | t\_person |
  - birthdate

#### *4(1)(d) their identification document number*

If the customer is a natural person, then either their driver's license number, passport number, or other valid identification document number. If the customer is an entity, then their New Zealand Business Number (NZBN) or Company Number.

When reporting: When the customer is a natural person, section 4(1)(d) is covered by the following fields:

- t\_to/from\_my\_client |  
to/from\_person
  - passport\_number
  - passport\_country
  - id\_number
  - identification
- t\_to/from\_my\_client |  
to/from\_account | signatory |  
t\_person
  - passport\_number
  - passport\_country
  - id\_number
  - identification

Note that the NZDL field (or id\_number in the XML schema) relates only to the New Zealand Driver's License Number.

When the customer is an entity, section 4(1)(d) is covered by the following fields:

- t\_to/from\_my\_client | to/from\_entity
  - incorporation\_number
  - incorporation\_country\_code
- t\_to/from\_my\_client |  
to/from\_account | t\_entity
  - incorporation\_number
  - incorporation\_country\_code

Provide the NZBN first, and if this is not available, then provide the Company Number.

*4(1)(e) the type of account or facility*

The type of the account or arrangement. In most cases this will align with requirements under section 4(1)(b).

*4(1)(f) the physical address of each customer party to the transaction or (if the party is a company) the address of its registered office (as available)*

If the customer is a natural person, then the physical address in which they reside. If the customer is an entity then the address of its registered office.

*4(1)(g) the phone number of each customer party to the transaction (as available)*

The phone number(s) of each customer party to the transaction, for both natural persons and entities.

*4(1)(h) any other identifying information regarding each customer party to the transaction (as available)*

Other identifying information regarding the customer(s) that is not covered in previous sections.

When reporting: When the customer is a natural person, sections 4(1)(f), 4(1)(g) and 4(1)(h) are covered by the following fields:

- t\_to/from\_my\_client |  
to/from\_person
  - addresses
  - phones
  - gender
  - nationality
  - residence
  - email
- t\_to/from\_my\_client |  
to/from\_account | signatory |  
t\_person
  - addresses
  - phones
  - gender
  - nationality
  - residence
  - email

When the customer is an entity, sections 4(1)(f), 4(1)(g) and 4(1)(h) are covered by the following fields:

- t\_to/from\_my\_client | to/from\_entity
  - addresses
  - phones
  - residence
  - email
- t\_to/from\_my\_client | to/from\_account | t\_entity
  - addresses
  - phones
  - residence
  - email

When providing an address, at least the following must be provided:

- address type – this is a drop-down menu or look up table, examples include:
  - [C] Business address
  - [H] Head office
  - [I] Home address
- address – this is a free text field for the house number, street name etc.
- city
- country\_code – this is a drop down menu or look up table, examples include:
  - [US] United States
  - [GB] United Kingdom
  - [CN] China

When providing a phone number, at least the following must be provided:

- tph\_contact\_type ph\_contact\_type phone number, at least the following must address\_type above
- tph\_communication\_type – this is a drop down menu or look up table, examples include:
  - [B] Landline phone
  - [C] Mobile phone
- tph\_number – this is a free text field for the actual phone number

For each person acting on behalf of a customer, or any other party to the transaction –

*4(2)(a) the name of the person*

The full name of the person acting on behalf of the customer.

*4(2)(c) their date of birth (as available, if applicable)*

The date of birth of the person acting on behalf of the customer.

*4(2)(d) their identity document number*

The driver's license number, passport number, or other valid identification relating to the person acting on behalf of the customer.

When reporting: When there is someone acting on behalf of the customer, sections 4(2)(a), 4(2)(c) and 4(2)(d) are covered by the following fields:

- t\_from\_my\_client | t\_conductor
  - first\_name
  - middle\_name
  - last\_name



- birthdate
- passport\_number
- passport\_country
- id\_number
- identification

*4(2)(b) their account number or unique customer identifier (as available)*

The account number or unique internal reference number that is assigned to the person acting on behalf of the customer.

*4(2)(e) if the customer is not a natural person, identifying information that allows the transaction to be traced back to the person originating the transaction on behalf of the customer (as available)*

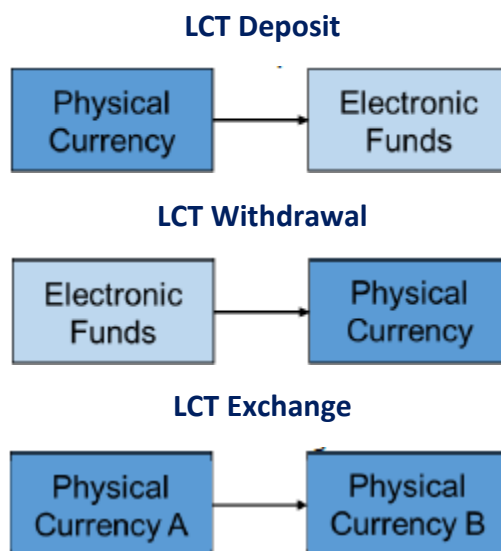
If the customer is an entity, then additional details on the individual conducting the transaction on behalf of that entity. See above sections for further guidance.

## Large Cash Transactions

### Types of LCTs

Large Cash Transactions (LCTs) involve the use of physical currency of \$10,000 and above in New Zealand Dollars (NZD). Physical currency means the coin and printed money that is designated as legal tender, and both circulates and is customarily used and accepted as a medium of exchange in the country of issue (AML/CFT Act 2009).

These requirements apply to transactions where physical currency is either deposited, withdrawn or exchanged for other physical currency, as follows:



This excludes the use of bearer negotiable instruments unless those are subsequently exchanged for physical currency within New Zealand. These include but are not limited to: bills or exchange, cheques, promissory notes, bearer bonds, traveller's cheques, money orders and postal orders.

### PTR Section Five: General Information

These requirements relate to the reporting entity submitting the LCT. ***Italicised*** text are directly from the PTR regulations, whereas the rest is interpretive guidance to assist

reporting entities with their compliance requirements, including some useful information in **blue** boxes, which specifically assists with what to do when reporting.

For the reporting entity –

*5(a) the name of the reporting entity*

The registered name of the reporting entity with the FIU.

*5(b) the business address of the reporting entity*

The registered business address of the reporting entity with the FIU.

*5(c) the name of the reporting entity's AML/CFT supervisor*

Either the Reserve Bank of New Zealand (RBNZ), the Department of Internal Affairs (DIA) or the Financial Markets Authority (FMA).

When reporting: goAML allows for a reporting entity ID number (rentity\_id, REID, organisation ID) to be submitted, which will be used as a proxy for 5(a) and 5(b) requirements.

## **PTR Section Six: Transaction Details**

These requirements relate to LCTs and details of the actual transaction, rather than individuals or entities involved in a transaction.

For each transaction –

*6(a) the branch or location and the name of the facility where the transaction took place (if relevant)*

Branch name or physical location where the transaction took place. In most cases, the name of the facility will be the name of the reporting entity and covered by section 6(a).

When reporting: Section 6(a) is covered by the transaction\_location free text field.

For all LCTs, provide the branch name or the physical address, along with "New Zealand" at the end (e.g. 123 Sample Street, Wellington, New Zealand).

*6(b) the date and time of transaction*

The time and date the transaction took place (i.e. initiated).

When reporting: If your systems do not reliably collect this information, or if various dates apply to the transaction, then select the processing date as a proxy.

*6(c) the mode of the transaction (e.g. in person, ATM, or other relevant system or channel)*

The transaction mode or type. For LCTs, it will be one of the options in the blue box below.

When reporting: Section 6(c) is covered by the transmode\_code field, which is based on a drop-down menu or code table. In most cases, one of the following options would likely be selected for LCTs:

1. [C] ATM – Deposit
2. [J] ATM – Withdrawal
3. [N] Credit card – Deposit
4. [Y] Credit card – Withdrawal

5. [AL] Electronic transaction – Deposit
6. [BB] Electronic transaction – Withdrawal
7. [BE] In branch/office – Currency exchange
8. [BF] In branch/office – Denomination exchange
9. [BG] In branch/office – Deposit
10. [BW] In branch/office – Withdrawal
11. [CD] Other – Currency exchange
12. [CE] Other – Denomination exchange
13. [CF] Other – Deposit
14. [CW] Other – Withdrawal
15. [BY] Via mail or deposit box – Deposit

*6(d) the type of funds (e.g. cash...)*

The type of funds involved in the transaction, which includes the originating (payer) funds type and the beneficiary (payee) funds type.

When reporting: Section 6(d) is covered by the following fields:

- from\_funds\_code; and
- to\_funds\_code

For LCTs, one of the following options would most likely be selected:

1. [D] Cash
2. [E] Cash (different currency than the to/from side)
3. [F] Cash (different denomination than the to/from side)
4. [N] Electronically held funds (used for the account side of the transaction that the funds are deposited into or withdrawn from)

Refer to the '5.2 Funds Type' tab in the PTR Data Schema (Dictionary) for all options.

*6(e) the amount in New Zealand dollars*

The New Zealand dollar amount for each transaction, including those that involve foreign currency.

*6(f) the amount in foreign currency (if applicable)*

The amount of a foreign currency sent or received.

*6(g) the exchange rate (if applicable)*

The exchange rate used in the conversion of the foreign currency to New Zealand dollars.

When reporting: Section 6(e) is covered by the amount\_local field which will always be in New Zealand dollars (NZD). For transactions only involving foreign currency, use the NZD exchange rate for that particular currency on the day that the transaction took place.

As per Part 1 Section 7 of the Act, if there is more than one rate of exchange on that date [the equivalent in New Zealand currency that can be], calculate the average of those rates.

Sections 6(f) and 6(g) are covered by the foreign\_currency\_code, foreign\_amount and foreign\_exchange\_rate fields. These are all part of an optional subnode called

t\_foreign\_currency which applies to both the originating (payer) funds and the beneficiary (payee) funds – as follows:

- t\_from\_my\_client | from\_foreign\_currency > t\_to\_my\_client | to\_foreign\_currency OR
- t\_from\_my\_client | from\_foreign\_currency > t\_to | to\_foreign\_currency OR
- t\_from | from\_foreign\_currency > t\_to\_my\_client | to\_foreign\_currency OR
- t\_from | from\_foreign\_currency > t\_to | to\_foreign\_currency

*6(h) the unique transaction reference number*

The unique reference or account number that is assigned to the large cash transaction.

### **PTR Section Seven: Customer Details**

These requirements relate to LCTs and generally refer to the details of the customer party or parties, and anyone acting on behalf of a customer. This section covers scenarios where the customer(s) is/are the originator and/or beneficiary.

For each customer party to the transaction –

*7(1)(a) their name*

The full name of the customer if they are a natural person. For entities, the name of that entity and, if possible, the 'legal name' of that entity.

When reporting: When the customer is a natural person, section 7(1)(a) is covered by the following fields:

Cash side of the transaction	Account side of the transaction
<ul style="list-style-type: none"><li>• t_to/from_my_client   to/from_person<ul style="list-style-type: none"><li>○ first_name</li><li>○ middle_name</li><li>○ last_name</li></ul></li></ul>	<ul style="list-style-type: none"><li>• t_to/from_my_client   to/from_account   signatory   t_person<ul style="list-style-type: none"><li>○ first_name</li><li>○ middle_name</li><li>○ last_name</li></ul></li></ul>

For entities choosing to automate the submission of their PTRs, if there are issues converting a name text-string into a first, middle and last name – please do the following:

first\_name – provide the first text string prior to the first 'space'

last\_name – provide the entire string text for the name

If only initials and a last name are provided, place the initials in the first\_name field and the last name in the last\_name field.

In scenarios where:

- a reporting entity only has access to a non-customer name as one text string, or
- the name is not split into separate name component fields as part of normal processing, or
- cannot be split with a reasonably high level of confidence into first, middle and last name strings

Then report the full name in t\_person | first\_name and repeat the full name string in t\_person | last\_name.

When the customer is an entity, section 7(1)(a) is covered by the following fields:

- t\_to/from\_my\_client | to/from\_entity
  - name
  - commercial\_name
- t\_to/from\_my\_client | to/from\_account | t\_entity
  - name
  - commercial\_name

If you have one entity name and you know that it is the legal 'trading as' name for the entity, supply this name in both fields above.

*7(1)(b) their account number or unique customer identifier*

The customer account number or unique internal reference number that is assigned to the customer.

When reporting: When the customer is a natural person, section 7(1)(b) is covered by the following fields:

- t\_to/from\_my\_client | to/from\_account | account
- t\_to/from\_my\_client | to/from\_account | client\_number

or banks in particular, account numbers can be supplied in either a two- or three-digit suffix denotation. If there is no account (and therefore, account number) associated with the transaction, then one of the following nodes can be used on the cash side of the transaction:

- t\_to\_my\_client | to\_person/entity
- t\_from\_my\_client | from\_person/entity

*7(1)(c) their date of birth (if applicable)*

If the customer is a natural person, then their date of birth.

When reporting: Section 7(1)(c) is covered by the following fields:

- t\_to/from\_my\_client | to/from\_person | birthdate
- t\_to/from\_my\_client | to/from\_account | signatory | t\_person | birthdate

*7(1)(d) their identification document number*

If the customer is a natural person, then either their driver's license number, passport number, or other valid identification document number. If the customer is an entity, then their New Zealand Business Number (NZBN) or Company Number.

When reporting: When the customer is a natural person, section 7(1)(d) is covered by the following fields:

- | Cash side of the transaction   | Account side of the transaction  |
|--|--|
| • t_to/from_my_client   to/from_person <ul style="list-style-type: none"><li>○ passport_number</li><li>○ passport_country</li><li>○ id_number</li><li>○ identification</li></ul> | • t_to/from_my_client   to/from_account   signatory   t_person <ul style="list-style-type: none"><li>○ passport_number</li><li>○ passport_country</li><li>○ id_number</li><li>○ identification</li></ul> |

Note that the NZDL field (or id\_number in the XML schema) relates only to the New Zealand Driver's License Number.

When the customer is an entity, section 7(1)(d) is covered by the following fields:

Cash side of the transaction

- t\_to/from\_my\_client | to/from\_entity
  - incorporation\_number
  - incorporation\_country\_code

Account side of the transaction

- t\_to/from\_my\_client | to/from\_account | t\_entity
  - incorporation\_number
  - incorporation\_country\_code

Provide the NZBN first, and if this is not available, then provide the Company Number.

*7(1)(e) the type of account or facility the type of the account or arrangement.*

In most cases this will align with requirements under section 7(1)(b).

*7(1)(f) the physical address of each customer party to the transaction or (if the party is a company) the address of its registered office (as available)*

If the customer is a natural person, then the physical address in which they reside. If the customer is an entity, then the address of its registered office.

*7(1)(g) the phone number of each customer party to the transaction (as available)*

The phone number(s) of each customer party to the transaction, for both natural persons and entities.

*7(1)(h) any other identifying information regarding each customer party to the transaction (as available)*

Other identifying information regarding the customer(s) that is not covered in previous sections.

When reporting: When the customer is a natural person, sections 7(1)(f), 7(1)(g) and 7(1)(h) are covered by the following fields:

Cash side of the transaction

- t\_to/from\_my\_client | to/from\_person
  - addresses
  - phones
  - gender
  - nationality
  - residence
  - email

Account side of the transaction

- t\_to/from\_my\_client | to/from\_account | signatory | t\_person
  - addresses
  - phones
  - gender
  - nationality
  - residence
  - email

When the customer is an entity, sections 7(1)(f), 7(1)(g) and 7(1)(h) are covered by the following fields:

Cash side of the transaction

- t\_to/from\_my\_client | to/from\_entity
  - addresses
  - phones
  - residence
  - email

- Account side of the transaction\_to/from\_my\_client | to/from\_account | t\_entity
  - addresses
  - phones
  - residence
  - email

When providing an address, **at least** the following **must** be provided:

- address\_type – this is a drop-down menu or look up table, examples include:

- [C] Business address
- [H] Head office
- [I] Home
- Address - this is a free text field for the house number street name etc.
- city
- country\_code – this is a drop down menu or look up table, examples include:
  - [US] United States
  - [GB] United Kingdom
  - [CN] China

When providing a phone number, **at least** the following **must** be provided:

- tph\_contact\_type – this is the same drop down menu or look up table as for address\_type above
- tph\_communication\_type – this is a drop down menu or look up table, examples include:
  - [B] Landline phone
  - [C] Mobile phone
- tph\_number – this is a free text field for the actual phone number

For each person acting on behalf of a customer, or any other party to the transaction –

*7(2)(a) the name of the person*

The full name of the person acting on behalf of the customer.

*7(2)(c) their date of birth (as available, if applicable)*

The date of birth of the person acting on behalf of the customer.

*7(2)(d) their identity document number*

The driver's license number, passport number, or other valid identification relating to the person acting on behalf of the customer.

When reporting: When there is someone acting on behalf of the customer, sections 7(2)(a), 7(2)(c) and 7(2)(d) are covered by the following fields:

- t\_from\_my\_client | t\_conductor
  - first\_name
  - middle\_name
  - last\_name
  - birthdate
  - passport\_number
  - passport\_country
  - id\_number
  - identification

*7(2)(b) their account number or unique customer identifier (as available)*

The account number or unique customer identifier (internal reference number) that is assigned to the person acting on behalf of the customer. For transactions where the person initiating the transaction is one of the customer parties (e.g. a signatory), then this can be derived.

*7(2)(e) if the customer is not a natural person, identifying information that allows the transaction to be traced back to the person originating the transaction on behalf of the customer (as available)*

If the customer is an entity, then additional details on the individual conducting the transaction on behalf of that entity. See above sections for further guidance.



## Appendix A

### Regulations Mapping for Automated Reporting

Below is an overview of how the PTR regulations are aligned with the PTR Data Schema (Dictionary). It may also be useful for entities that are manually entering their reports on goAML Web.

In contrast to the PTR Data Schema (Dictionary), this takes into account the multiple fields that can exist as sub-nodes. For example, there is one unique node associated with a person that is a customer of the reporting entity (i.e. `t_person_my_client`) but this is used throughout the goAML XML Schema, including for when the customer is either the originator or the beneficiary.

This will not include all fields that exist within the PTR Data Schema (Dictionary), but only those that have been directly mapped to a section in the PTR regulations – this is for IFTs, LCTs or both.

#### 3.1 | Report

Node and Field Name	IFT Mapping	LCT Mapping
<code>rentity_id</code>	1(a), 1(b), 1(c)	6(a), 6(b), 6(c)

#### 3.2 | Transaction

Node and Field Name	IFT Mapping	LCT Mapping
<code>transactionnumber</code>	3(a)(ii), 3(b)(ii)	
<code>transaction_location</code>	2(a), 2(j)	6(a)
<code>transaction_description</code>	Multiple	Multiple
<code>date_transaction</code>	2(c)	6(b)
<code>value_date</code>	2(k)	
<code>transmode_code</code>	2(d)	6(c)
<code>transmode_comment</code>	2(k)	
<code>amount_local</code>	2(f)	6(e)

##### 3.41 | `t_from_my_client`

Node and Field Name	IFT Mapping	LCT Mapping
<code>from_funds_code</code>	2(e)	6(d)
<code>from_funds_comment</code>	2(e)	6(d)
<code>from_foreign_currency</code> <ul style="list-style-type: none"> <li><code>foreign_currency_code</code></li> <li><code>foreign_amount</code></li> <li><code>foreign_exchange_rate</code></li> </ul>	2(g), 2(h)	6(f), 6(g)
<code>t_conductor</code> <ul style="list-style-type: none"> <li><code>gender</code></li> <li><code>first_name</code></li> <li><code>middle_name</code></li> <li><code>last_name</code></li> <li><code>birthdate</code></li> <li><code>passport_number</code></li> <li><code>passport_country</code></li> <li><code>id_number</code></li> <li><code>phones &gt; phone</code></li> <li><code>addresses &gt; address</code></li> </ul>	4(2)(a), 4(2)(c), 4(2)(d), 4(2)(e)	7(1)(e), 7(2)(a), 7(2)(c), 7(2)(d), 7(2)(e)

<ul style="list-style-type: none"> <li>• email</li> <li>• identification</li> </ul>		
<ul style="list-style-type: none"> <li>• from_account</li> <li>• institution_name</li> <li>• institution_code</li> <li>• swift</li> <li>• branch</li> <li>• account [number]</li> <li>• account_name</li> <li>• client_number</li> <li>• personal_account_type</li> <li>• t_entity <ul style="list-style-type: none"> <li>o name</li> <li>o commercial_name</li> <li>o phones &gt; phone</li> <li>o addresses &gt; address</li> </ul> </li> <li>• signatory <ul style="list-style-type: none"> <li>o is_primary</li> <li>o t_person <ul style="list-style-type: none"> <li>▪ gender</li> <li>▪ first_name</li> <li>▪ middle_name</li> <li>▪ last_name</li> <li>▪ birthdate</li> <li>▪ passport_number</li> <li>▪ passport_country</li> <li>▪ id_number</li> <li>▪ nationality1</li> <li>▪ nationality2</li> <li>▪ nationality3</li> <li>▪ residence</li> <li>▪ phones &gt; phone</li> <li>▪ addresses &gt; address</li> <li>▪ email</li> <li>▪ identification</li> <li>▪ role</li> </ul> </li> </ul> </li> </ul>	1(a), 4(1)(a), 4(1)(b), 4(1)(c), 4(1)(d), 4(1)(e), 4(1)(f), 4(1)(g)	5(a), 7(1)(a), 7(1)(b), 7(1)(c), 7(1)(d), 7(1)(f), 7(1)(g)
<ul style="list-style-type: none"> <li>• from_person</li> <li>• gender</li> <li>• first_name</li> <li>• middle_name</li> <li>• last_name</li> <li>• birthdate</li> <li>• passport_number</li> <li>• passport_country</li> <li>• id_number</li> <li>• nationality1</li> <li>• nationality2</li> </ul>	4(1)(a), 4(1)(c), 4(1)(d), 4(1)(f), 4(1)(g), 4(1)(h)	7(1)(a), 7(1)(c), 7(1)(d), 7(1)(f), 7(1)(g), 7(1)(h)

<ul style="list-style-type: none"> <li>• nationality3</li> <li>• residence</li> <li>• phones &gt; phone</li> <li>• addresses &gt; address</li> <li>• email</li> <li>• identification</li> </ul>		
<b>from_entity</b> <ul style="list-style-type: none"> <li>• name</li> <li>• commercial_name</li> <li>• incorporation_number</li> <li>• phones &gt; phone</li> <li>• addresses &gt; address</li> <li>• email</li> <li>• incorporation_country_code</li> </ul>	4(1)(a), 4(1)(d), 4(1)(f), 4(1)(g), 4(1)(h)	7(1)(a), 7(1)(d), 7(1)(f), 7(1)(g), (1)(h)
from_country	2(b)	Always New Zealand

### 3.42 | t\_from

Node and Field Name	IFT Mapping	LCT Mapping
from_funds_code	2(e)	6(d)
from_funds_comment	2(e)	6(d)
from_foreign_currency <ul style="list-style-type: none"> <li>• foreign_currency_code</li> <li>• foreign_amount</li> <li>• foreign_exchange_rate</li> </ul>	2(g), 2(h)	6(f), 6(g)
from_account <ul style="list-style-type: none"> <li>• institution_name</li> <li>• institution_code</li> <li>• swift</li> <li>• non_bank_institution</li> <li>• branch</li> <li>• account [number]</li> <li>• account_name</li> <li>• personal_account_type</li> <li>• signatory               <ul style="list-style-type: none"> <li>○ is_primary</li> <li>○ t_person                   <ul style="list-style-type: none"> <li>▪ gender</li> <li>▪ first_name</li> <li>▪ middle_name</li> <li>▪ last_name</li> <li>▪ birthdate</li> <li>▪ passport_number</li> <li>▪ passport_country</li> <li>▪ id_number</li> <li>▪ phones &gt; phone</li> <li>▪ addresses &gt; address</li> <li>▪ email</li> <li>▪ identification</li> <li>▪ role</li> </ul> </li> </ul> </li> </ul>	3(b)(i), 3(b)(ii), 3(b)(iii), 3(b)(iv), 3(b)(v)	

<b>from_person</b> <ul style="list-style-type: none"> <li>gender</li> <li>first_name</li> <li>middle_name</li> <li>last_name</li> <li>birthdate</li> <li>passport_number</li> <li>passport_country</li> <li>id_number</li> <li>phones &gt; phone</li> <li>addresses &gt; address</li> <li>email</li> <li>identification</li> </ul>	3(b)(i), 3(b)(iii), 3(b)(iv), 3(b)(v)	
<b>from_entity</b> <ul style="list-style-type: none"> <li>name</li> <li>commercial_name</li> <li>phones &gt; phone</li> <li>addresses &gt; address</li> </ul>	3(b)(i), 3(b)(iii), 3(b)(iv)	
<b>from_country</b>	2(b), 3(b)(iii)	Always New Zealand

### 3.51 | t\_to\_my\_client

Node and Field Name	IFT Mapping	LCT Mapping
to_funds_code	2(e)	6(d)
to_funds_comment	2(e)	6(d)
to_foreign_currency <ul style="list-style-type: none"> <li>foreign_currency_code</li> <li>foreign_amount</li> <li>foreign_exchange_rate</li> </ul>	2(g), 2(h)	6(f), 6(g)
to_account <ul style="list-style-type: none"> <li>institution_name</li> <li>institution_code</li> <li>swift</li> <li>branch</li> <li>account</li> <li>account_name</li> <li>client_number</li> <li>personal_account_type</li> <li>t_entity <ul style="list-style-type: none"> <li>name</li> <li>commercial_name</li> <li>phones &gt; phone</li> <li>addresses &gt; address</li> </ul> </li> <li>signatory <ul style="list-style-type: none"> <li>is_primary</li> <li>t_person <ul style="list-style-type: none"> <li>gender</li> <li>first_name</li> <li>middle_name</li> <li>last_name</li> </ul> </li> </ul> </li> </ul>	1(a), 4(1)(a), 4(1)(b), 4(1)(c), 4(1)(d), 4(1)(f), 4(1)(g)	6(a), 7(1)(a), 7(1)(b), 7(1)(c), 7(1)(d), 7(1)(f), 7(1)(g)

<ul style="list-style-type: none"> <li>▪ birthdate</li> <li>▪ passport_number</li> <li>▪ passport_country</li> <li>▪ id_number</li> <li>▪ nationality1</li> <li>▪ nationality2</li> <li>▪ nationality3</li> <li>▪ residence</li> <li>▪ phones &gt; phone</li> <li>▪ addresses &gt; address</li> <li>▪ email</li> <li>▪ identification</li> <li>▪ role</li> </ul>		
<b>to_person</b> <ul style="list-style-type: none"> <li>• gender</li> <li>• first_name</li> <li>• middle_name</li> <li>• last_name</li> <li>• birthdate</li> <li>• passport_number</li> <li>• passport_country</li> <li>• id_number</li> <li>• nationality1</li> <li>• nationality2</li> <li>• nationality3</li> <li>• residence</li> <li>• phones &gt; phone</li> <li>• addresses &gt; address</li> <li>• email</li> <li>• identification</li> </ul>	4(1)(a), 4(1)(c), 4(1)(d), 4(1)(f), 4(1)(g), 4(1)(h)	7(1)(a), 7(1)(c), 7(1)(d), 7(1)(f), 7(1)(g), 7(1)(h)
<b>to_entity</b> <ul style="list-style-type: none"> <li>• name</li> <li>• commercial_name</li> <li>• incorporation_number</li> <li>• phones &gt; phone</li> <li>• addresses &gt; address</li> <li>• email</li> <li>• incorporation_country_code</li> </ul>	4(1)(a), 4(1)(d), 4(1)(f), 4(1)(g), 4(1)(h)	7(1)(a), 7(1)(d), 7(1)(f), 7(1)(g), 7(1)(h)
<b>to_country</b>	Always New Zealand	Always New Zealand

### 3.52 | t\_to

Node and Field Name	IFT Mapping	LCT Mapping
to_funds_code	2(e)	6(d)
to_funds_comment	2(e)	6(d)
to_foreign_currency	2(g), 2(h)	6(f), 6(g)
<ul style="list-style-type: none"> <li>• foreign_currency_code</li> <li>• foreign_amount</li> </ul>		

<ul style="list-style-type: none"> <li>• <b>foreign_exchange_rate</b></li> </ul>		
<ul style="list-style-type: none"> <li>• to_account</li> <li>• institution_name</li> <li>• institution_code</li> <li>• swift</li> <li>• non_bank_institution</li> <li>• branch</li> <li>• account [number]</li> <li>• account_name</li> <li>• personal_account_type</li> <li>• signatory <ul style="list-style-type: none"> <li>○ is_primary</li> <li>○ t_person <ul style="list-style-type: none"> <li>▪ first_name</li> <li>▪ middle_name</li> <li>▪ last_name</li> <li>▪ birthdate</li> <li>▪ role</li> </ul> </li> </ul> </li> </ul>	3(a)(ii), 3(a)(iii), 3(a)(iv), 3(a)(v)	
<ul style="list-style-type: none"> <li>• <b>to_person</b></li> <li>• gender</li> <li>• first_name</li> <li>• middle_name</li> <li>• last_name</li> <li>• birthdate</li> <li>• passport_number</li> <li>• passport_country</li> <li>• id_number</li> <li>• phones &gt; phone</li> <li>• addresses &gt; address</li> <li>• email</li> <li>• identification</li> </ul>	3(a)(ii), 3(a)(iii), 3(a)(iv), 3(a)(v)	
<ul style="list-style-type: none"> <li>• <b>to_entity</b></li> <li>• name</li> <li>• commercial_name</li> <li>• phones &gt; phone</li> <li>• addresses &gt; address</li> </ul>	3(a)(i), 3(a)(iii), 3(a)(iv)	
<ul style="list-style-type: none"> <li>• <b>to_country</b></li> </ul>	3(a)(iii)	Always New Zealand