



## THE CENTRAL BANK OF BELIZE

### MISSION

To promote the stability of monetary and financial systems for the wellbeing of Belize.

### AML STRATEGY

It is the policy of the Central Bank of Belize (Central Bank) to contribute to the national AML strategy to prevent money laundering, terrorism financing, and financing the proliferation of weapons of mass destruction.

This strategy is a collaborative effort between the Central Bank, other domestic and foreign supervisory authorities, and supervised institutions to actively identify, understand, and assess ML/TF/PF risks in Belize's financial system. Together, risk-based mitigating measures are implemented to align with international standards and best practices. In addition, on-going outreach is undertaken to sensitize stakeholders on AML matters.



CENTRAL BANK  
of BELIZE

Gabourel Lane  
Belize City  
BELIZE

Tel: (501) 223 – 6194

Web: [www.centralbank.org.bz](http://www.centralbank.org.bz)

Email: [compliance@centralbank.org.bz](mailto:compliance@centralbank.org.bz)



CENTRAL BANK  
of BELIZE

# ANTI-MONEY LAUNDERING HIGHLIGHTS

Notice No. 3 | September 2024



## SUSPICIOUS TRANSACTION REPORTING (STR)

The Financial Action Task Force (FATF) Recommendation 20 defines suspicious transactions as any event within a financial institution that could be possibly related to fraud, money laundering, terrorist financing, or other illegal activities.

### RED FLAGS

Money laundering or terrorism financing (ML/TF) may occur in several ways. Some red flags to look for include:

- Transactions that are overly complex.
- Transactions that differ from the usual activities of the customer.
- Transactions with an unusual pattern that have no apparent or visible economic or lawful purpose.
- Transactions that exceed prescribed limits.
- Business relations and transactions with persons from or in high-risk or monitored jurisdictions.
- Electronic funds transfer that do not contain complete originator information.

[Refer to the AML-CFT-CPF Guidelines for Central Bank-Regulated Institutions - Appendix 10 for additional information on red flags.](#)



Source: Google Photos

### WHAT IS AN STR?

An STR is a formal report to be submitted by a Reporting Entity (RE) to the Financial Intelligence Unit (FIU) within a prescribed timeframe if it suspects a transaction or series of transactions relate to criminal activities.

### WHEN TO FILE AN STR

Section 17 (4) of the Money Laundering and Terrorism (Prevention) Act (MLTPA) requires an RE to:

- File an STR when the RE suspects or has reasonable grounds to suspect that funds are derived from illegal activities and are related to a ML/TF offence; and
- Submit the STR within three (3) days after a suspicion has been formed.

### HOW TO FILE AN STR

Once a suspicion is formed an RE is to complete the STR form as follows:

- Provide all details of the customer(s) and suspicious activity, i.e., date, time, and location of the alleged suspicious activity.
- Provide reason for suspicion and supporting evidence if applicable.
- Document details of action taken by RE.

The prescribed STR form can be found via the FIU's website: <https://fiubelize>

Section 8 of the MLTPA emphasizes the importance of exercising discretion to refrain from “tipping-off” individuals involved in reported suspicious activities. It is an offence to do so.

When filing an STR, **confidentiality** is key!

### KEY TAKEAWAYS

Reporting entities should:

- Look out for ML/TF red flags.
- Submit STRs within the prescribed three-day timeframe.
- Detail why the transaction(s) or behavior is considered suspicious and provide supporting documents.
- Maintain confidentiality when handling STRs.
- Avoid tipping-off to prevent possible criminal sanctions.