goAML Web User’s Guide
– Registration
version 2.2

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Foreword

goAML is an integrated and modular system designed to fit the needs of Financial Intelligence Units. The goAML solution is executed in the following steps – collection, collation, analysis (rule-based, risk score and profiling), case workflow and intelligence dissemination. The data sent by the financial institutions goes to a common database and becomes accessible to the Financial Intelligence Unit of Mauritius’ (“FIU”) analysis division. The goAML system then permits data analysis. goAML is able to process and analyse high volumes of reports; suspicious transactions or cash transactions, cross border amongst others. The reports are fully populated with all the information needed for analysis to begin, from full customer details through to transactional details for multiple time frames. The system also permits electronic data collection and dissemination from other Sources such as Tax and Law Enforcement authorities, Property Registrars, Vehicle Registrars etc.

This guide aims to assist relevant (a) Reporting Entities\(^1\); and (b) Stakeholder agencies and Supervisory Bodies under the AML/CFT institutional framework of Mauritius to register on the goAML Web application. Registration on goAML will thus enable them, where applicable, to use their goAML account to report a Suspicious Transaction Report (“STR”) in line with Sections 14 and 15 of The Financial Intelligence and Anti-Money Laundering Act 2002 (“FIAMLA 2002”), file referrals and/or exchange information with FIU.

This guide will become effective as from 01 April 2020.

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Legal Disclaimer

The FIU reserves the right to amend, modify or change the contents of this document

\(^{1}\) Under the Financial Intelligence and Anti-Money Laundering Act 2002 (“FIAMLA 2002”), a “Reporting Person” is defined as a bank, financial institution, cash dealer or member of a relevant profession or occupation. Across the goAML application, the term “Reporting Person” has a different meaning than that used in FIAMLA 2002. Hence, for the purpose of this guide and in order to avoid any confusion, the alternative terms “Reporting Entity” or “Reporting Entities” will be used throughout to designate any of those entities/persons having an obligation to make a report to the FIU under the Section 14 of FIAMLA 2002.
1. Getting Started – The User Interface

The goAML Web application (“goAML Web”) is not freely accessible; you must have special access permissions to be able to work with it.

To access goAML Web, either you enter the URL https://www.mrugoaml.fiumauritius.org/ into your Web browser window or you can access goAML Web via the FIU’s homepage (http://www.fiumauritius.org). The goAML Mauritius Home Page will be launched.

To file STRs with real data, you will be required to click on goAML Production (green button “Production Environment”).

For testing purposes and getting yourself acquainted with the system, you will be required to click on goAML Test (orange button “Test Environment”).

Registration to the Production Environment and the Test Environment

Users of goAML Web may register an account on the Production Environment (for submission of real data) as well as another account on the Test Environment (for submission of test data and other test purposes). New users are strongly encouraged to first register on the Test Environment to get themselves acquainted with the goAML functionalities, prior to using the Production Environment.

The procedures described in the remainder of this guide are valid for both the Production Environment and the Test Environment.
Upon choosing one of the two Environments, the first page you will be taken to is the goAML login page.

**Important Note:** The two Environments are distinguishable from the colour scheme of the Navigation Bar (area denoted by ② above) The Production Environment has a Navigation Bar with a blue-green colour scheme (as in the above image) while the Test Environment has a Navigation Bar with a black colour scheme.

If you already have your user credentials, you can just log in with them (see chapter 1.4: Login to goAML Web). If not, you have to register as a user first.

**Elements of the goAML login page**

- **Header:** [area denoted by ① above] It contains the application’s logo with the Home link. Click on the logo to return to the application’s home page. It also displays the country flags corresponding to the language options available in the application. You can click on the flag to switch to the required application language.

- **Navigation bar:** [area denoted by ② above] It is the element for navigating to the goAML Web functions. On the login page, only two menus are available: “Register” and “Login”. Hover over a menu with the mouse pointer to see the functions it contains.
• **Body:** [area denoted by ④ above] It is the largest part of the application window; it contains the functional elements of the current working context, including the contact details of the FIU’s goAML Helpdesk.

• **Footer:** [area denoted by ④ above] It provides a link to the UNODC home page plus the copyright and version information.
1.1 The Register Menu on goAML Web

In order to apply for a goAML user account, you have to register on goAML as an Organization or as a Person.

Hover over the mouse over the Register menu in the navigation bar. The two options of this menu will appear on a drop down list.

1.1.1 Notes for “Reporting Entity”

On first registration on goAML Web, any Reporting Entity (corporate body, individual, or otherwise) will ALWAYS have to register first as an Organization.

Key point:

On goAML Web, the first registration of a Reporting Entity (corporate body, individual, or otherwise) is NEVER done as a Person.

Important note: If you hold one or more licenses (from the same, or more than one, Supervisory Body) and these licenses are each subject to obligations under FIAMLA 2002, then you should register separate goAML ‘Organization’ account for each relevant license (or, as the case may be, a separate sub-accounts in a Delegation structure – See Annex 1 for more information on set up of Delegation structures). Since goAML will not allow you to register with the same Organization Name more than once, the protocol in place is to distinguish each separate goAML account by adding the licence name in abbreviated form and between squared brackets after its registered company name. For example, a company with two licences may be allowed to register its two accounts on goAML with the following Organization Names:

<table>
<thead>
<tr>
<th>Fields on online goAML Registration form</th>
<th>Organization Name</th>
<th>Organization Business Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st Account</td>
<td>Example Ltd [NBFILic.]</td>
<td>Non-Bank Deposit Taking Institutions</td>
</tr>
<tr>
<td>2nd Account</td>
<td>Example Ltd [Leasing Lic.]</td>
<td>S14 – Leasing</td>
</tr>
</tbody>
</table>
Getting Started

(A) Registration of Reporting Entity defined as Banks, Financial Institutions and Cash Dealers under FIAMLA 2002

- If you are a Money Laundering Reporting Officer (“MLRO”), or an authorised Reporting Officer, of a Reporting Entity and you are registering your organisation and yourself for the first time, you must register as an **Organization** first. During this registration process, the details of the Reporting Entity will be added in the *Registering Organization* section of the online registration form, while the details of the MLRO/ authorised Reporting Officer will be added in the *Registering Person* section. The following points are worth noting:

  (i) The registering MLRO/ authorised Reporting Officer will be automatically identified on goAML Web as the default Administrator User (“Admin User”) of the goAML Web account of the Reporting Entity.

  (ii) Completing the registration as an **Organization** does not mean that the goAML account of the Reporting Entity and its MLRO/ authorised Reporting Officer is activated and can be used. Your account can only be activated by your Supervisory Body; once activated, your Reporting Entity will be assigned a unique **Organization ID** on goAML Web (See **chapter 1.2: Registration Form: Organization** for detailed explanations on Registration procedures for an **Organization**).

- If you are an employee of a Reporting Entity (other than the MLRO/authorised Reporting Officer) and you have been authorised to use goAML as an additional user, you must register as **Person**. However, prior to doing so, you must first contact your “Admin User” (usually MLRO/ authorised Reporting officer) and secure your **Organization ID**. (See **chapter 1.3: Registration Form: Person** for detailed explanations on Registration procedures for a **Person**). Hence, registration of an employee of a Reporting entity (other than the MLRO/authorised Reporting officer) can only be done after the registration of the Reporting Entity has been accepted and its account activated. **Note:** the user request can only be activated by the “Admin User” of the registered organisation.

**Key point:**

On goAML Web, the registration of additional users of a registered Reporting Entity is **NEVER** done as an **Organization**.

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2 Please refer to the definition of “Supervisory Authorities” in FIAMLA 2002

3 The Organization ID is a unique ID generated by goAML at the time of registration. The Organization ID assigned on the *Production* environment is **not the same** as the Organization ID assigned on the *Test* environment. Hence users should be careful when registering as “Persons” on goAML and not quote the wrong Organization ID. See **Chapter 1.3** of this guide for “Register as Person” procedures.
(B) Registration of Reporting Entity defined as "Members of the relevant professions or occupations" under FIAMLA 2002

- Members of relevant professions or occupations under FIAMLA 2002 are required to register as an Organization in order to use goAML and make full use of its functionality. Just like Reporting Entities defined as Banks, Financial Institutions and Cash Dealers under FIAMLA 2002 on the previous page, you will need to fill up the details in “Registering Organization” as well as the details in “Registering Person”. The person designated under the “Registering Person” will be the default “Admin User” (usually the Member of the relevant professions or occupations himself / herself) of the goAML account. For you to be able to access and use your goAML account, your registration needs to be first activated by your Supervisory Body. (See chapter 1.2: Registration Form: Organization for detailed explanations on Registration procedures for a Member of the relevant professions or occupations).

- In the event that additional authorised users to an existing goAML account of a Member of the relevant professions or occupations are needed, these additional users must register as Person. However, prior to doing so, they must first contact the “Admin User” (usually the Member of the relevant professions or occupations) and secure its Organization ID. (See chapter 1.3: Registration Form: Person for detailed explanations on Registration procedures for a Person). Hence, registration of any additional users can only be done after the registration of the Member of the relevant professions or occupations has been accepted by its Supervisory Body and its account activated. Note: the user request can only be activated by the “Admin User” of the registered organisation.

Φ Key point:

On goAML Web, the registration of additional users of a registered Reporting Entity (including Members of the relevant professions or occupations) is NEVER done as an Organization.

1.1.2 Notes for “Stakeholder”

- Stakeholders include law enforcement agencies and supervisory/regulatory bodies that use goAML to exchange information with the FIU, or to make referrals to the FIU.

- In practice, a Stakeholder’s goAML account is pre-created and login credentials are communicated to each Stakeholder (note: this may change in the future). The Stakeholder will then only need to update its agency/ body’s data to take ownership of the goAML account. At a minimum, the following data should be amended by the Stakeholder:

4 Please refer to the definition in FIAMLA 2002
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(i) login credentials

(ii) the contact details of the Stakeholder

(iii) the name and contact details of the authorised person appointed by the Stakeholder who will be the “Admin User” of the goAML account.

- If additional authorised users to a Stakeholder’s goAML account are needed, these additional users must register as Person. However, prior to doing so, they must first contact the “Admin User” of the Stakeholder and secure its Organization ID. (See chapter 1.3: Registration Form: Person for detailed explanations on Registration procedures for a Person). Note: the user request can only be activated by the “Admin User” of the registered Stakeholder.

⚠ Key point:

On goAML Web, the registrations of additional users of a registered Stakeholder is NEVER done as an Organization.

1.1.3 Notes for “Supervisory Body”

- Supervisory bodies include the Bank of Mauritius, the Financial Services Commission and all regulatory bodies specified in the Column 2 of Part 1 of the First Schedule of the FIAMLA 2002.

- A Supervisory Body’s goAML account is used exclusively to administer the registration of Reporting Entities falling under its purview (i.e. the “Activation of New Organisations/ Delegation” or “Activation of change requests submitted by Existing Organisations/ Delegation”).

- In practice, a Supervisory Body’s goAML account is pre-created and login credentials are communicated to each Supervisory Body (note: this may change in the future). The Supervisory Body will then only need to update its data to take ownership of the goAML account. At a minimum, the following data should be amended by the Supervisory Body:

  (i) login credentials

  (ii) the contact details of the Supervisory Body

  (iii) the name and contact details of the authorised person appointed by the Supervisory who will be the “Admin User” of the goAML account.

- If additional authorised users to a Supervisory Body’s goAML account are needed, these additional users must register as Person. However, prior to doing so, they must first contact the “Admin User” of the Supervisory Body and secure its Organization ID. (See chapter 1.3: Registration Form: Person for detailed explanations on
Registration procedures for a Person). Note: the user request can only be activated by the “Admin User” of the registered Supervisory Body.

Key point:

On goAML Web, the registrations of additional users of a registered Supervisory Body is NEVER done as an Organization.
1.2  Registration Form: Organization (relevant mainly for “Reporting Entity”)

Step 1: To access the Registration Form for an Organization, select “Register As Organization” from the “Register” menu of the Navigation Bar.

Step 2: The Registration Form for an Organization will appear onscreen. The form is made up of 5 distinct sections, namely, the “Registration Type”, “Registering Organization”, “Registering Person”, “Attachments” and the “Submit Request”. Mandatory fields (system defined) are denoted with an asterisk (*) but there are also certain fields which you are recommended at a minimum to provide details for. For other fields, you are not required to provide the information but you are encouraged to fill as much information as possible.
**Step 3:** Once the form is filled with all required information and attachments, click on “Submit Request” button. You will receive an instant onscreen notification informing you that your registration info has been submitted. You will also receive a unique reference number in the format “RE_RP000 [sequential number] – DD MMM YYYY”; keep note of this unique reference number in case you need to enquire on the status of your request with your Supervisory Body.

It is also important to note the following:

(i) An email notification will also be sent to the email address inserted at **Step 2** above.

(ii) Remember that at this stage, your registration is still pending the approval of your Supervisory Body and hence the login credentials inserted at **Step 2** above will not work.

(iii) Once your request is accepted/ rejected, you will receive a second email notification informing you of same.

(iv) Your request may be rejected by your Supervisory Body on certain grounds e.g. incomplete data submitted, requested documents not attached, discrepancy in information submitted etc. In its rejection message, your Supervisory Body may detail out the grounds for rejection; same will be communicated in the email notification. You will then have to submit a fresh registration form with the amended information.
1.2.1 “Registering Type” section

This is where you choose which type of Organization is being registered, either as “Reporting Entity”, “Stakeholder” or “Supervisory Body”. Please refer to paragraph 1.1 above for details on type of Organizations.

The default option is “Reporting Entity”. It is worth noting that the structure of the “Registering Organization” section (see paragraph 1.2.2 below) will change depending on the type of Organization selected. Therefore, whenever a new registration is initiated, the “Registering Type” section must be first filled prior to filling other sections of the form.

If you are a Reporting Entity, you can only choose the “Reporting Entity” option.

1.2.2 “Registering Organization” section

This is the section where the details pertaining to the registering Reporting Entity are keyed in. The mandatory and minimum recommended fields to be filled are as follows:

- **Organization Business Type**: Choose your *Business Type* from the drop down list, e.g. Bank, Management Companies, Casino, Licensed Auditor etc. Your choice will depend on:
  (i) the license held by your institution (in the case of a Reporting Entity).
  
  (ii) the license held by you or your firm\(^6\) (in the case of a Member of the relevant professions or occupations)

**Key point:**

It is important that you select the correct organisation business type when you are registering as an organisation so that your registration request is forwarded to the correct Supervisory Body for approval and activation.

**Note 1:** The list of ‘Organization Business Type’, as well as any other fields providing drop down options, is not exhaustive. In case your particular license type is not listed, kindly contact the FIU’s goAML Helpdesk prior to starting your Registration process so that your particular license type is added to the drop down list.

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\(^5\) These mandatory and minimum recommended fields constitute the “particulars” referred to in regulation 5. of the FIAMLA Regulations 2019 (GN no. 238 of 2019) for regulations under sections 14C and 35 of FIAMLA 2002.

\(^6\) Currently, on goAML Web, there is no separate Organization Business Type for licensed auditors (individuals) and licensed audit firms (legal entity). Hence, licensed auditors are expected to register separately both themselves (as licensed individuals) and their licensed firm.
• **Name:** Input the full name of your institution. If you are an individual registering in your own name as a Member of the relevant professions or occupations, key in your full name in CAPITAL LETTERS.

• **Acronym:** Key in an acronym for your institution. If you are an individual registering in your own name as a Member of the relevant professions or occupations, input your initials.

• **Incorp. Num:** Key in the incorporation number of your institution. If you are an individual registering in your own name as a Member of the relevant professions or occupations, you can input your licence number (e.g., your roll number allocated to you by your Supervisory Body/ Registering body; in case you do not have one, then use your business registration number allocated by the Registrar of Businesses)

• **Swift/Bic:** In the case of a bank or a financial institution, please enter a SWIFT code if you have one. For other registrants, enter your TAN number.

• **Incorporation Legal Form:** Select from the drop down list

• **Incorp. Country:** Select a country from the drop down list

• **Contact Person:** This field is very important. It will signify to your Supervisory Body the name of the MLRO/authorised Reporting Officer of the Reporting Entity, and thereby enable them to validate your registration request. Key in the full name of the MLRO/authorised Reporting Officer of the Reporting Entity in this field. If you are an individual registering in your own name as a Member of the relevant professions or occupations, enter your full name.

• **Email:** The email address that will be used by the registering Reporting Entity to communicate with the FIU. It is also the organisational email that will receive notifications from goAML pertaining to information exchanged with the FIU (e.g., when reports filed are accepted or rejected, when new messages are received in Message Board, etc). It is worthwhile to note the following points:
  (i) As best practice, it is recommended that a group email address is used in case you expect that notifications received by the Reporting Entity should be communicated to a group of users instead of one single user. Such best practice will also avoid any possible future continuity issues in case a designated single user no longer forms part of your institution.
  
  (ii) The security architecture of the goAML Web system is designed such that any email address keyed during a single registration session (i.e. in one registration form for an organisation or one registration form for a person) cannot be used again in a subsequent registration session; the entered organisational email address acts as a true unique identifier for a registered organisation on goAML, thus allowing comprehensive audit trail framework. Hence, due considerations should
be given to this factor while choosing the email address to be keyed in. (See also paragraph 1.2.3 below).

- **Phones** and **Addresses**: These fields are the contact details of the Reporting Entity. Click on the + icon to generate the sub sections. At a minimum, fill in all mandatory fields (denoted with an asterisk (*)). You can add any number of phone records/addresses associated with the Reporting Entity by clicking on the + icon. The phone records/addresses will appear in a grid on the Registration form. You can delete any of these records by clicking on ✗.
1.2.3  “Registering Person” section

This is the section where the details pertaining to the default “Admin User” are keyed in, together with the login credentials for the goAML account being registered. Usually, the default “Admin User” is the MLRO/authorised Reporting Officer designated by the registering Reporting Entity, or as the case may be, the individual registering in his/her own name as a Member of the relevant professions or occupations.

This default role of “Admin User” can later be amended after the activation of the goAML account. (See the goAML Web User’s Guide that is available after log in for detailed explanations on managing your goAML account, filing STRs and using the Message Board).

The mandatory and minimum recommended fields to be filled in this section are as follows:

- **User name**: The login name you want to use (b/w 4 and 50 characters)
- **Email**: The user email address you want to use to communicate with goAML. As explained under paragraph 1.2.2 above, the goAML system is designed such that any email address keyed during a single registration session cannot be used again in a subsequent registration session. Hence, any email address keyed in under paragraph 1.2.2 can be used once again in this field; this is the only time when the email address can be used twice, as it is being used during the same registration session. A different email address can also be chosen for the “Registering Person”. *Note: If the user email address is not the same as the organisational email address, the user email address will only get notifications from goAML that are relevant to the individual access of the person e.g. used during password reset procedures etc. The user email address does not receive goAML notifications pertaining to the information exchanged with the FIU.*
- **Password / Confirm password**: The password you want to use for your login (b/w 5 and 10 characters)
- **First name / Last name**: Key in the real name of the “Registering Person” (Last name in CAPITAL LETTERS)
- **Birth Date**: Enter the date of birth of the “Registering Person”
- **NIC**: Applicable for Mauritian nationals. Enter the National Identity Card number (alphanumeric code, 14 characters). For non-Mauritian nationals, fill in the Passport field instead.
- **Nationality**: Fill in the current nationality of the “Registering Person”
- **Occupation**: Key in the current occupation of the “Registering Person” within the registering Reporting Entity
- **Passport**: Applicable mainly for non-Mauritian nationals. Select “Yes” and enter the passport number and issuing country.
• **Phones** and **Addresses**: These fields are the contact details of the “Registering Person”. Click on the **+** icon to generate the sub sections. At a minimum, fill in all mandatory fields (denoted with an asterisk (*)). You can add any number of phone records/addresses associated with the “Registering Person” by clicking on the **+** icon. The phone records/addresses will appear in a grid on the Registration form. You can delete any of these records by clicking on **×**.

1.2.4 **“Attachments” section**

You can select any file format to upload from your respective File Browser window and click on the Upload button to upload it in the system.

![Attachments Table]

**Φ Key point:**

The FIU of Mauritius requests that MLROs of Reporting Entities attach a letter issued by their CEO or Directors of the Reporting Entities authorising the MLRO to register themselves on behalf of the Reporting Entities; the letter should be addressed to their relevant Supervisory Body\(^7\). Also, scanned copies of the passport or National Identity Card of the MLRO shall be submitted at the time of registration.

For members of the relevant professions or occupations, the FIU requests that the registering member attach a letter indicating to their Supervisory Body\(^4\) their intention to register on goAML. Also, scanned copies of the passport or National Identity Card of the member shall be submitted at the time of registration.

Since most goAML registrations are done on non-face-to-face basis, the abovementioned documents need to be attached in order to enable the Supervisory Body to verify the identity of the person requesting access on goAML against existing licensing information in their records.

The original letter with attachments shall then be hand delivered or sent by registered mail to the Supervisory Body; a copy shall also be sent to the Financial Intelligence Unit.

1.2.5 **“Submit Request” section: Captcha**

Before submitting the request, the user has to type the Captcha (sequence of digits that appears on the screen just above the “Submit Request” button) into the box without making any errors.

\(^7\) Please refer to the definition of “Supervisory Authorities” in FIAML 2002
1.3 Registration Form: Person (relevant for additional users of “Reporting Entity”, “Stakeholder” and “Supervisory Body”)

This Registration Form is used to register additional authorised users to an existing Reporting Entity’s goAML account.

In registered organisations like Banks, Financial Institutions, Cash Dealers, Stakeholders or Supervisory Bodies, there is often a team of persons that is tasked with filing reports / referrals to the FIU and exchanging information with the FIU. Since registration under chapter 1.2 above will only register the initial “Admin User” of the Reporting Entity, any other users will have to register separately.

The activation of the registration of these other users is carried out internally at the Reporting Entity's (or Stakeholder's or Supervisory Body's) level and hence, does not involve the intervention of an overseeing entity like a Supervisory Body or system super administrator like the FIU.

Once their access to an existing Organization account is activated, the authorised additional users can be assigned different degree of access to the goAML account of the Reporting Entity (or Stakeholder or Supervisory Body) depending on the internal access protocol established at the registered organisation. For instance, an additional user can be made as a second (or sole) “Admin User” of the registered organisation. (See the goAML Web User's Guide that is available after log in for detailed explanations on managing your goAML account (including assigning roles), filing STRs and using the Message Board).

Step 1: To access the Registration Form for a Person, select “Register As Person” from the “Register” menu of the Navigation Bar.
Step 2: The Registration Form for a Person will appear onscreen. The form is made up of 4 distinct sections, namely, the “Registration Type”, “Registering Person”, “Attachments” and the “Submit Request”. Mandatory fields (system defined) are denoted with an asterisk (*) but there are also certain fields which you are recommended at a minimum to provide details for. For other fields, you are not required to provide the information but you are encouraged to fill as much information as possible.
Step 3: Once the form is filled with all required information, click on “Submit Request” button. You will receive an instant onscreen notification informing you that your registration info has been submitted. You will also receive a unique reference number in the format “RE_RP000 [sequential number] – DD MMM YYYY”; keep note of this unique reference number in case you need to enquire on the status of your request with your “Admin User”.

It is also important to note the following:

(i) An email notification will also be sent to the email address inserted at Step 2 above.

(ii) Remember that at this stage, your registration is still pending the approval of your “Admin User” and hence the login credentials inserted at Step 2 above will not work.

(iii) Once your request is accepted/rejected, you will receive a second email notification informing you of same.

(iv) Your request may be rejected by your “Admin User” on certain grounds e.g. incomplete data submitted, discrepancy in information submitted etc. In its rejection message, your “Admin User” may detail out the grounds for rejection; same will be communicated in the email notification. You will then have to submit a fresh registration form with the amended information.
1.3.1 “Registering Type” section

This section should **ALWAYS** be left blank with its default settings. If the field under this section is modified, this will obligatorily lead to the registration request being rejected.

1.3.2 “Registering Person” section

This is the section where the details pertaining to any additional authorised user to an existing Reporting Entity are keyed in, along with the login credentials for that additional user.

The mandatory and minimum recommended fields to be filled in this section are as follows:

- **Organization ID**: It refers to the unique ID assigned by goAML to any activated registered organisation. Prior to filling this field, the registering person should ask the Organization ID from the “Admin User” of the registered organisation. This field accepts only integers (b/w 0 and 10000000).

⚠️ **Key point:**

Please apply utmost care while keying in the Organization ID. Entering the wrong ID will result in a registration request being sent to the “Admin User” of another registered organisation. Remember also that the Organization ID assigned on the *Production* environment is **not the same** as the Organization ID assigned on the *Test* environment!

For example, suppose there is a Reporting Entity called "Alpha-Alpha-Alpha Limited", with the Organization ID 3898 on goAML (Production). Then, suppose there is another, unrelated Reporting Entity called "Omega-Omega-Omega Limited", with the Organization ID 3998 on goAML (Production). If you are an authorised employee from "Alpha-Alpha-Alpha Limited", you should key in the ID 3898.

If by mistake you enter the ID 3998 and submit the request, then your request will **not** be channeled to the “Admin User” of "Alpha-Alpha-Alpha Limited" – the request will not appear on the dashboard of "Alpha-Alpha-Alpha Limited". Instead, your request will be routed to the “Admin User” of "Omega-Omega-Omega Limited".

If after submitting your registration request, you realise that you entered the wrong Organization ID (as your request does not appear on the dashboard of your “Admin User”), you should immediately contact the goAML Helpdesk of the FIU.

Notes for “Admin User”: if you come across a User registration request for a person who is not authorised by your Organisation or who is not on your staff list, immediately Reject the request (add your Rejection grounds in the Comments box) and thereafter, inform the goAML Helpdesk of the FIU.

In order to identify what your **Organization ID** is, follow the steps in Chapter 1.4 below.
• **User name:** The login name you want to use (b/w 4 and 50 characters). Please note that contrarily to other fields in this section, user name cannot be modified once activated.

• **Email:** The user email address you want to use to communicate with goAML. As explained under paragraph 1.2.2 above, the goAML system is designed such that any email address keyed during a single registration session cannot be used again in a subsequent registration session. Hence, any email address keyed in this field cannot be used again in the subsequent registration of another user. In addition:
  
  (i) as long as a pending user registration request has not been rejected by your “Admin User”, you cannot submit a fresh user registration request with an email address featured in the pending User request.

  (ii) as long as a pending Organization registration request has not been rejected by a Supervisory Body, you cannot submit a fresh user registration request with an email address featured in the pending Organization request.

*Note: The user email address will only get notifications from goAML that are relevant to the individual access of the person e.g. used during password reset procedures etc. The user email address does not receive goAML notifications pertaining to the information exchanged with the FIU.*

• **Password / Confirm password:** The password you want to use for your login (b/w 5 and 10 characters).

• **First name / Last name:** Key in the real name of the “Registering Person” (Last name in CAPITAL LETTERS)

• **Birth Date:** Enter the date of birth of the “Registering Person”

• **NIC:** Applicable for Mauritian nationals. Enter the National Identity Card number (alphanumeric code, 14 characters). For non-Mauritian nationals, fill in the Passport field instead.

• **Nationality:** Fill in the current nationality of the “Registering Person”

• **Occupation:** Key in the current occupation of the “Registering Person” within the registering Reporting Entity

• **Passport:** Applicable mainly for non-Mauritian nationals. Select “Yes” and enter the passport number and issuing country.

• **Phones and Addresses:** These fields are the contact details of the “Registering Person”. Click on the icon to generate the sub sections. At a minimum, fill in all mandatory fields (denoted with an asterisk (*)). You can add any number of phone records/addresses associated with the “Registering Person” by clicking on the icon.
The phone records/ addresses will appear in a grid on the Registration form. You can delete any of these records by clicking on ✗.

1.3.3 “Attachments” section

You can select any file format to upload from your respective File Browser window and click on the Upload button to upload it in the system.

<table>
<thead>
<tr>
<th>File Name</th>
<th>File Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>BankTransactions_April.xls</td>
<td>237024</td>
</tr>
<tr>
<td>Bank Transactions_0.xls</td>
<td>241152</td>
</tr>
<tr>
<td>Bank Transactions_1.xls</td>
<td>241132</td>
</tr>
</tbody>
</table>

There is currently no requirement from the FIU/ Supervisory Body for additional authorised users to attach formal letters of authority to their registration requests on goAML as the administration of such requests is carried out internally at the Reporting Entity's (or Stakeholder's or Supervisory Body's) level. Hence, the requirement to attach documents to the registration request of additional authorised users depends essentially on the internal policy at the Reporting Entity, Stakeholder or Supervisory Body.

However, it is worth noting that there is an exception to the above principle. Notably, in the event that there is no longer an active “Admin User” in the existing goAML account of the Reporting Entity, Stakeholder or Supervisory Body. In such a case, the person who will register himself/ herself on goAML to take on the “Admin User” role, will have to attach a letter of authority and a copy of his/ her identifiers as mentioned under paragraph 1.2.4 above.

1.3.4 “Submit Request” section: Captcha

Before submitting the request, the user has to type the Captcha (sequence of digits that appears on the screen just above the “Submit Request” button) into the box without making any errors.
1.4 Login to goAML Web

Once you receive an email notification information you that your account was activated, you may log into your account using the credentials you entered under Paragraphs 1.2.3 or 1.3.2.

- To log in and start a goAML Web session:
  1. Click on Login in the navigation bar.
  2. Enter your login name into the field User Name and your password into the field Password:

  ![Login Page]

  3. Click on Log In.
  4. The application’s home page is loaded and displayed:

  ![Home Page]

  **Note:** The contents of the home page are widely configurable and thus might look different from the above screenshot.
• To know what is your **Organization ID** (if you are the “Admin User” or you are a user who has been granted such access):

1. Hover your mouse over the “Admin” menu.

2. Click on “Active Organizations” in the drop down menu.

3. The **Organization ID** can be read in the first column of the table onscreen.

(See the *goAML Web User’s Guide* that is available after log in for detailed explanations on managing your goAML account, filing STRs and using the Message Board).

### 1.5 Logout from goAML Web

To log off from goAML:

1. Click on **Logout** in the navigation bar. Your goAML session is terminated.

*Note: After some time without activity you are logged off automatically (default time: 30 mins)*

### 1.6 Contact goAML Helpdesk

A special helpdesk, for any assistance that you may require, has been set at the FIU. The contact details are:

Email: *goamlhelpdesk@FIUmauritius.org*

Tel: 454 1423
Annex 1: Delegation structures on goAML

Annex 1: Delegation

The goAML system allows multiple Organizations to be linked together, under the administration of the same “Admin User”, through the Delegation functionality of the Active Organizations menu (available after log in).

In practice, when several Reporting Entities are related (e.g. in the same portfolio, same Group of companies, same administration etc) and there is only one designated MLRO/“Admin User” for these Reporting Entities, then the Delegation feature can be used to bypass the need for multiple email addresses in separate registrations. Currently, the Delegation functionality is extensively used by certain financial institutions in Mauritius.

If you have never used the Delegation functionality of your goAML account, it would be advisable to contact the FIU first to determine whether this functionality would be appropriate for your Reporting Entities. Also, it is recommended to practice the set up and administration of Delegation on the Test platform first, before implementing the set up on the Production platform.

It is important to understand the following principles associated with the Delegation functionality:

a. The related Reporting Entities should first decide which Organization, out of all related Organizations, will be the “Principal Organization” on goAML. In goAML terminology, the “Principal Organization” is called the Delegate Organization (abbreviated as “Del-Org” hereafter). All other related Organizations are called Delegating Organizations (abbreviated as “Dtg-Org” hereafter).

b. The Del-Org will be the first Organization to be registered and activated on goAML (following steps under section 1.2 in this guide).

c. The Dtg-Orgs cannot be registered at the same time as the Del-Org. It is only once the “Admin User” has log into the activated Del-Org that he/she can initiate the creation of the Dtg-Orgs on goAML, within the existing account of the Del-Org. Each appended Dtg-Org will received a unique Organization ID which is of course different from the ID of the Del-Org or the other appended Dtg-Orgs.
Annex 1: Delegation structures on goAML

d. Once Dtg-Orgs have been appended to the Del-Org, it is possible to shift one or more Dtg-Orgs to another the Del-Org. Note: this is very frequent in some registered financial institutions and hence, this concept may not be relevant for most other Reporting Entities.

e. Through Delegation, the “Admin User” of the Del-Org becomes the “Admin User” of the affiliated Dtg-Orgs too. The “Admin User” can thus file reports on behalf of the Del-Org or on behalf of any related Dtg-Org.

f. Upon the initial set up of a Del-Org and its Dtg-Orgs, there will be only one set of credentials to access the goAML Web account of Del-Org and its Dtg-Orgs i.e. the credentials of the “Admin User”. This is because although a number of Dtg-Orgs were appended to the Del-Org, only one user (therefore, only one log in) initially exists for all linked Organizations. Hence, after the initial set up of the Delegation, the “Admin User” has the option to activate the registrations of other users who will either link themselves to a specific Dtg-Org (via the specific Org ID), or to the Del-Org itself (with full access to the Dtg-Orgs).

g. The first user to register to a specific Dtg-Org becomes the de facto “Admin User” of that Dtg-Org only; he or she has no visibility on the goAML activities of other linked Organizations.

h. The goAML system for Delegation is set up such that visibility of Web Reports and Messages of linked Organizations (i.e. Del-Org and Dtg-Orgs) is segregated:

- Users registered to a particular Dtg-Org have visibility only on Web Reports/ Messages relating to their particular Dtg-Orgs.

- However, the initial “Admin User” who set up the Delegation under the Del-Org retains his/ her full visibility on all linked Organizations; the same is true for any additional users added to the Del-Org and granted such level of access. For Messages, the “Admin User” will have to each time log in as a specific Organization (Del-Org or Dtg-Org) to access its Message Board.
Practical Example on TEST Platform

To better illustrate the mechanics of **Delegation**, suppose there is a **Del-Org** called “Yellow Iris”. The MLRO of “Yellow Iris” is SUNNY1 (username). SUNNY1 is employed by a management company and as such is to act as MLRO of not only “Yellow Iris”, but also of the unrelated companies “Blue Cosmos”, “Green Daffodil” and “Carmine Lily”. Therefore, “Blue Cosmos”, “Green Daffodil” and “Carmine Lily” will be the **Dtg-Orgs**.

SUNNY1 must first register “Yellow Iris” and himself on goAML (SUNNY1 will have to register via the “Register as Organization” menu). Upon activation by the Supervisory Body, “Yellow Iris” is assigned the Org ID of 783. SUNNY1 is the “Admin User” of the goAML account of “Yellow Iris”. These **Del-Org** and **Dtg-Orgs** will be used in the illustrations used in this chapter.
Annex 1: Delegation structures on goAML

1.1 Set up of Delegation – Registration

(i) Log into the goAML account of the Del-Org (as “Admin User”). Select Admin ➤ Active Organizations from the Navigation bar.

(ii) Create your first Dtg-Org (“Blue Cosmos”): Click on the button situated at the bottom-left of the Active Organizations interface. A “Registering Organization” form will load:

Notes: The “Registering Organization” form looks similar to the form available to Organizations on the goAML login page. However, the “Registration Type” and the “Registering Person” sections are not present; this is because Dtg-Org should have the same “Registration Type” and the same “Admin User” as its Del-Org. Refer to Chapter 1.2 of the goAML Web User’s Guide – Registration (version 2.2) for original “Register as Organization” form.
Annex 1: Delegation structures on goAML

(iii) Fill in the mandatory fields (denoted with an asterisk (*)): Organization Business Type, Name of Organization, Acronym, SWIFT/BIC and [organisational] Email⁸. Other fields may be filled for completeness or according to internal policy of Reporting Entities. You may refer to Chapter 1.2 of the goAML Web User’s Guide – Registration (version 2.2) for detailed explanations on each field.

(iv) When the form is completed and any required attachments (e.g. Letter of Authority indicating the number of Dtg-Orgs and their common MLRO and identifier documents) are loaded, click on Submit. An onscreen notification will confirm that the registration information has been submitted; an email notification will also be sent to the email address entered under point (iii) above.

(v) Repeat steps (i) to (iv) for all other Dtg-Orgs to be appended under the goAML account of the Del-Org.

(vi) The submitted registration applications of the Dtg-Orgs can only be activated by the relevant Supervisory Body. The status of the registration application can be viewed under the Admin ▶ Org Request Management menus. If a registration is still pending at Supervisory Body level, the registration application will be have a Request Status of Waiting for Supervisory Body to Verify.

⁸ Since a Dtg-Org is intended to be under the common administration of Del-Org, technically, the same organisational email as the Del-Org can be entered during the set up of the Dtg-Org. However, by using the same organisational email, the recipient of a goAML notification from that organisation email will not be able to distinguish whether the notification refers to the Del-Org or the Dtg-Org; while this may not represent a practical issue when a Delegation structure consists of a few Dtg-Orgs only, this may become more problematic if the structure consists of multiple Dtg-Orgs e.g. 50 – when logging in goAML, the user will have to browse each Message Board, one by one, to identify which Message Board received the notification. Hence, Reporting Entities using Delegation should carefully consider this aspect (using the same organisational email address or different email addresses) when planning their Delegation structures.
Annex 1: Delegation structures on goAML

1.2 Administration of Delegation – Overview

Once the Supervisory Body has activated all the registrations of the Dtg-Orgs, email notifications will be sent to the Dtg-Orgs. The “Admin User” is now the goAML administrator of the Del-Org as well as all related Dtg-Orgs. Remember that at this stage, the “Admin User” is the sole user linked to all the related Organizations and therefore, there is only one set of credentials. Other users, if any, have not registered yet.

(i) Log into the goAML account of the Del-Org (as “Admin User”). Due to the set up of a Delegation, the first page to load after log in has now changed. The logged in person (in this example “SUNNY1”) has a choice on whether he/ she wants to access goAML as the Del-Org (“Yellow Iris”) or as one of the activated Dtg-Orgs (e.g. “Carmine Lily”).

(ii) If the Del-Org (“Yellow Iris”) is selected, click on Login. The “Admin User” (“SUNNY1”) will be logged into the access of “Yellow Iris”. Any Web Reports/ Messages submitted will be on behalf of “Yellow Iris”. The “Admin User” should log out and log in again in order to switch Organization.
(iii) If the “Admin User” wishes to be logged in as one of the Dtg-Org (e.g. “Carmine Lily”), he / she should select from the drop down list the name of the Dtg-Org and click on Login.

The “Admin User” (“SUNNY1”) will be logged into the access of “Carmine Lily”. Any Web Reports/ Messages submitted will be on behalf of “Carmine Lily”. The “Admin User” should log out and log in again in order to switch Organization.
Annex 1: Delegation structures on goAML

(iv) As the “Admin User” (irrespective of which Organization he/she has logged in as), “SUNNY1” can view the Delegation set up through the Admin ▶ Active Organizations menus.

![Active Organizations screenshot]

**Notes**: There are two important fields to note -

a. **Org ID**: each registered Organization has its own unique ID.

b. **Is delegating**: this field shows the ID of the Del-Org (“Yellow Iris”, ID 783). Hence, it is clear that “Blue Cosmos”, “Green Daffodil” and “Carmine Lily” are all Dtg-Orgs of “Yellow Iris”.

![Delegation structures on goAML](image-url)
1.3 Administration of Delegation – Additional Users: First User

Additional authorised users may register under the Del-Org or any of the Dtg-Orgs. These users should simply “Register as Person” (follow steps under section 1.3 of this guide) and mention the correct Org ID i.e. the ID of the Del-Org or the Dtg-Orgs.

- Remember that Registration of a Person on goAML is done according to the steps detailed in Section 1.3 of the goAML Web User’s Guide – Registration (version 2.2).

- Also, to activate the Registrations of any additional authorised the users, the “Admin User” should intervene on the Admin ➤ User Request Management menus.

In our example, “Yellow Iris” has the ID 783, “Blue Cosmos” the ID 784, “Green Daffodil” the ID 785, and “Carmine Lily” the ID 786.

One additional user “CLOUDY1” has registered itself using the ID 786 of “Carmine Lily”. The User Request Management page hence shows the pending activation of “CLOUDY1”:

(i) Since there is no other Admin user on the delegation at this stage, only the “Admin User” i.e. “SUNNY1” can activate (or reject) the application of “CLOUDY1”.

(ii) Once “SUNNY1” has FINALIZED the registration of “CLOUDY1”, “CLOUDY1” automatically becomes the “Admin User” of “Carmine Lily” only. Such access gives “CLOUDY1” full administrative access as far as it concerns “Carmine Lily” only i.e. “CLOUDY1” has full visibility on all Web Reports/ Messages of “Carmine Lily” and manages any other users linked to “Carmine Lily”. “CLOUDY1” does not have any visibility on the other Dtg-Orgs linked to “Yellow Iris” or on the activities in the account of “Yellow Iris”. At this stage, “SUNNY1” is still the sole person retaining visibility on all linked Organizations.
Annex 1: Delegation structures on goAML

1.4 Administration of Delegation – Additional Users: Other Users

Once the first user of a Dtg-Org has been activated (and thereby that first user became the “Admin User” of the Dtg-Org), other users can “Register as Person” using the ID of that Dtg-Org. The activation of the registrations of other users can be done by either the “Admin User” of the Del-Org or the “Admin User” of the Dtg-Org.

In our example, a second user “RAINY1” has registered itself using the ID 786 of “Carmine Lily”. Either “SUNNY1” (as Admin of the whole Delegation structure) or “CLOUDY1” (as Admin of “Carmine Lily” only) can activate (or reject) the application of “RAINY1”.

By default, any other users registering after the initial “Admin User” will have only basic access rights granted to him/her. The intervention of the initial “Admin User” is needed to upgrade the access of subsequent new users. Hence once activated, “RAINY1” will only have basic access to “Carmine Lily”. “SUNNY1” or “CLOUDY1” can upgrade the roles assigned to “RAINY1”.

Note: “SUNNY1” has an overview of all users linked to all Organizations via the Admin ▶ Active Users menus.

1.5 Administration of Delegation – Creating/ Assigning Roles

The goAML system allows the “Admin User” of the Del-Org to create roles for any Dtg-Org and to assign roles to any users linked to the Dtg-Orgs.

(i) To Create Roles: go to the Admin ▶ Role Management menus. A drop down list allows the “Admin User” of the Del-Org to select for which Organization the Roles are being created.

See also goAML Web User's Guide that is available after log in for detailed explanations on how to create/manage Roles.
Annex 1: Delegation structures on goAML

(ii) To Assign Roles: go to the Admin ▶ User-Role Management menus. A drop down list allows the “Admin User” of the Del-Org to select for which Organization’s users the Roles are being assigned.

See also goAML Web User's Guide that is available after log in for detailed explanations on how assign Roles to users.

Note: the “Admin User” of any one of the Dtg-Orgs has the same access as a normal “Admin User” of a Reporting Entity to Create/ Assign Roles for the users linked to the specific Dtg-Org. In our example, “CLOUDY1” can create/ assign roles to users of “Carmine Lily” but has no visibility on users of “Green Daffodil”.

1.6 Administration of Delegation – Limiting access

It is advisable for the “Admin User” of the Del-Org to elaborate a detailed blueprint on how Roles should be assigned at the Del-Org level and at its Dtg-Orgs levels.

For instance, the “Admin User” of the Del-Org may choose to limit the access of “Admin Users” of Dtg-Orgs, so that these “Admin Users” cannot get access to the Role Management menu or the Message Board. The “Admin User” of the Del-Org could also elect that other “Admin Users” may only draft Web Reports, while reserving the power to submit these reports at the Del-Org level. It will all depend on the internal administration decided at the Del-Org level.

See also goAML Web User's Guide that is available after log in for detailed explanations on how assign Roles to users.
Annex 1: Delegation structures on goAML

1.7 Changing the Delegate Organisation

The goAML system allows the “Admin User” of the Del-Org to shift a Dtg-Org under its administration to another Del-Org (or make a Dtg-Org independent of any Delegation structure). This can be a useful functionality where a different authorised Reporting user (or MLRO) has been appointed for a certain Organization, on a temporary or permanent basis. In practice, this frequently occurs to authorised Reporting users employed by one Management Company and who each have the responsibility of a portfolio of Organizations (which are Reporting Entities).

Changing the Del-Org of a Dtg-Org, requires you to submit an Organization Change Request that can only be activated by your Supervisory Body. Using the entities in our example, the steps to change the Del-Org are:

(i) Log in as “SUNNY1” of “Yellow Iris”. Go to Admin ▶ Active Organizations.

(ii) In the bottom left area of the Interface, select the Dtg-Org you wish to shift to another Del-Org. For instance, assume you move “Blue Cosmos” to an existing Organization called “BANK2015” (having the Org ID 363). Hence, select “Blue Cosmos” in the drop down list:

(iii) Then, click on the button. The following window pops up:
Annex 1: Delegation structures on goAML

Note: the Delegation details of “Blue Cosmos” clearly shows that its Org ID is 784 while the Org ID of its Delegate Organization (i.e. “Yellow Iris”) is 783.

(iv) To change the Del-Org of “Blue Cosmos”, activate the Change Delegation option by ticking (✔) the field. A system message will ask you to confirm your action. Click OK. The Delegate Organization ID field will be no longer greyed out.

(v) In the Delegate Organization ID field, replace “783” with the ID of the new Del-Org i.e. ID 363 of “BANK2015”. Note: alternatively, if the account of “Blue Cosmos” is intended to be henceforth operated independently of a Delegation structure, then the Delegate Organization ID field should be left blank.

(vi) Before submitting this change request, you need to attach a Letter of Authority (addressed to the Supervisory Body and mentioning the name and ID of the new Delegate Organization) and the copy of the ID of the new authorised Reporting User (or MLRO) as the goAML change request will be directed to the Supervisory Body after submission. Remember to send the hard copy of the letter to your Supervisory Body, with the FIU in copy.

(vii) If the email address entered for “Blue Cosmos” is the same as the old Del-Org i.e. “Yellow Iris”, then, goAML will require the email address to be changed prior to enabling you to submit the request. As already mentioned under Section 1.2.2 of this guide, this is because the security architecture of goAML Web recognises the common email address as the true unique identifier of all members of the Delegation structure; if a member leaves the Delegation, the system will not allow it to retain the email address.
Annex 1: Delegation structures on goAML

(viii) Click on **Submit Request** at the bottom of the page. The refreshed page will show the new **Delegate Organization ID**. However, this change request will not become active until the Organization Change Request is activated by your Supervisory Body. Until then, you may still recall the Organization Change Request.

(ix) On the **Admin › Org Request Management** screen, the Request Status of the Delegate Organization Change Request will read as **Waiting for Supervisory Body to Verify** until the Supervisory Body intervenes. Once activated, “Blue Cosmos” will no longer be listed in the Active Organizations screen of “Yellow Iris”.

⚠ Key point:

Please apply utmost care while keying in the **Delegate Organization ID**. Entering the wrong ID will result in the change request being sent to the wrong Supervisory Body or being linked to another registered organisation.

If after submitting your **Delegation Change Request**, you realise that you entered the wrong Organization ID, you should immediately **Recall** the request (via the **Org Request Management** menu) or contact the goAML Helpdesk of the FIU.