CENTRALE BANK VAN ARUBA

VIA E-MAIL ONLY

December 8, 2022

To the managements of all supervised
financial institutions and DNFBPs

VMI/gcr/2.46/INT/10984

Subject: **Revised reporting procedure sanctions regulations and updated reporting form sanctions regulations**

Dear Management,

Pursuant to the rules laid down in the Sanctions State Decrees, all financial institutions and designated non-financial businesses and professions (DNFBPs) are required to block without delay any funds or assets in the custody of their institution when a positive match is identified against the United Nations (UN) or European Union (EU) sanctions list, and immediately report such to the CBA. This for the purpose of preventing those funds or other assets from being used, transferred, converted, moved or made available.

This reporting obligation concerns the following Sanctions State Decrees, which are currently in force:

- Sanctions Decree Combat Terrorism and Terrorist Financing (AB 2010 no.27));
- Sanctions State Decree Libya (AB 2011 no.25);
- Sanctions State Decree Ukraine (AB 2014 no.26);
- Sanctions State Decree Sudan (AB 2014 no. 46);
- Sanctions State Decree South Sudan (AB 2015 no. 47);
- Sanctions State Decree Syria (AB 2016 no. 2);
- Sanctions State Decree on Central African Republic (AB 2016 no. 55);
- Sanctions State Decree on Yemen (AB 2017 no. 10);
- Sanctions State Decree on North Korea (AB 2017 no.42);
- Sanctions State Decree Cyber-Attacks (AB 2020 no. 125);
- Sanctions State Decree Human Rights Violations (AB 2021 no.30);
- Sanctions State Decree Chemical Weapons (AB 2021 no. 31); and
- Sanctions State Decree on Iran (AB 2021 no. 141).

Any transactions conducted by or for the benefit of natural persons, legal entities or other bodies on any of the foregoing sanctions lists must also be reported to the Financial Intelligence Unit Aruba (FIU-Aruba).

In view of the aforementioned, the reporting procedure sanctions regulations has been revised (enclosure 1), along with the reporting form sanctions regulations (enclosure 2), to include the latest enacted sanctions regulations. The reporting form must be used for the reporting to the CBA notwithstanding the obligation to also (where applicable) report to the FIU-Aruba. The revised reporting procedure and form can be found on the CBA's website under the heading "*Financial sanctions regulations*".

If you have any questions regarding this letter, please contact Ms. Vasilena Ivanova of the Integrity Supervision Department at telephone number (297) 5252-227 or by e-mail v.ivanova@cbaruba.org.

Sincerely yours,

Centrale Bank van Aruba

Enclosures: 2

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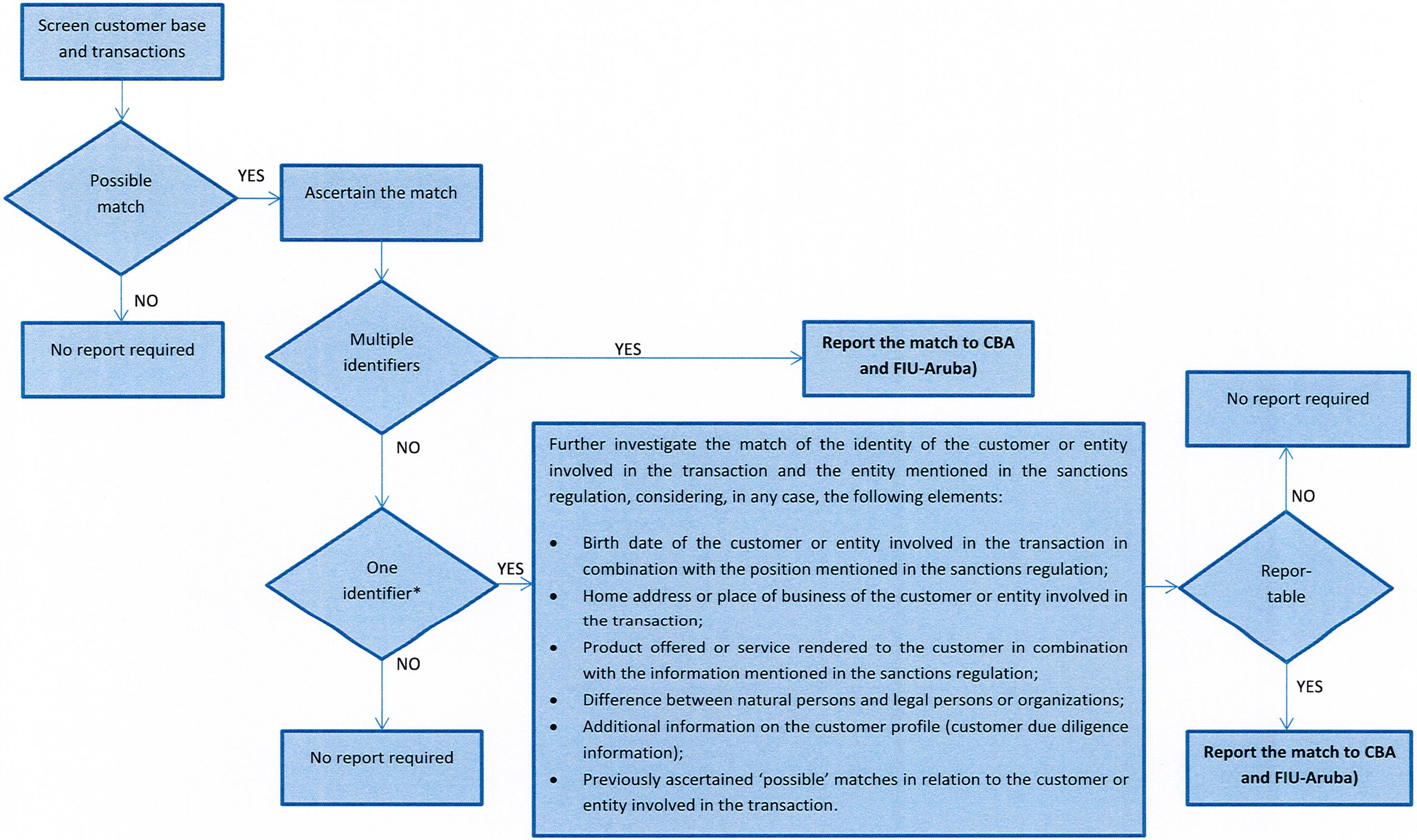
Reporting Procedure Sanctions Regulations

Centrale Bank van Aruba

The Reporting Procedure Sanctions Regulations is **applicable to** all financial service providers (banks, credit unions, finance companies, pension funds, insurance companies, insurance brokers, money transfer companies, money exchange offices, and pawn shops) and designated non-financial businesses and professions (DNFBPs) (accountants, casinos, car dealers, lawyers, jewelers, civil-law notaries, real estate companies, tax advisors, trust service providers and virtual asset service providers). In case of a positive match with any of the names of the natural/legal persons, bodies or entities designated on the UN/EU sanctions lists, the service provider is required to immediately inform the CBA of such, including any blocked funds/assets in its custody via the reporting form designed for this purpose. The transactions intended or carried out by or on behalf of designated natural/legal persons, bodies or entities must also be immediately reported to the Financial Intelligence Unit-Aruba (FIU-Aruba).

This reporting procedure concerns the following Sanctions State Decrees, which are currently in force: Sanctions Decree Combat Terrorism and Terrorist Financing (AB 2010 no.27)), Sanctions State Decree Libya (AB 2011 no.25), Sanctions State Decree Ukraine (AB 2014 no.26), Sanctions State Decree Sudan (AB 2014 no. 46), Sanctions State Decree South Sudan (AB 2015 no. 47), Sanctions State Decree Syria (AB 2016 no. 2), Sanctions State Decree on Central African Republic (AB 2016 no. 55), Sanctions State Decree on Yemen (AB 2017 no. 10), Sanctions State Decree on North Korea (AB 2017 no.42), Sanctions State Decree Cyber-Attacks (AB 2020 no. 125), Sanctions State Decree Human Rights Violations (AB 2021 no.30), Sanctions State Decree Chemical Weapons (AB 2021 no. 31), and Sanctions State Decree on Iran (AB 2021 no. 141). All financial institutions and DNFBPs are required to have updated lists of the sanctions decrees in time.



*such as name, alias, home address or place of business.

Enclosure 2

CENTRALE BANK VAN ARUBA REPORTING FORM SANCTIONS REGULATIONS

Lastly updated on November 29, 2022

This reporting form is applicable to all financial service providers (banks, credit unions, finance companies, pension funds, insurance companies, insurance brokers, money transfer companies, money exchange offices, and pawn shops) and designated non-financial businesses and professions (accountants, casinos, car dealers, lawyers, jewelers, civil-law notaries, real estate companies, tax advisors, trust service providers and virtual asset service providers) for the reporting to the Centrale Bank van Aruba in accordance with the Sanctions Regulations.

REPORTING ENTITY			
1.	Name		
2.	Address		
3.	Place of business		
4.	Contact person		
5.	Reporting requirement	☐ article 4 of the Sanction Decree Combat Terrorism and Financing Terrorism ☐ article 8 of the Sanction Decree Combat Terrorism and Financing Terrorism ☐ article 12 of the Sanction Decree Combat Terrorism and Financing Terrorism ☐ article 3, paragraph 2, of the Sanctions State Decree Libya ☐ article 4, paragraph 2, of the Sanctions State Decree Ukraine ☐ article 5, paragraph 2, of the Sanctions State Decree Sudan ☐ article 5, paragraph 2, of the Sanctions State Decree South Sudan ☐ article 5, paragraph 2, of the Sanctions State Decree Syria ☐ article 5, paragraph 2, of the Sanctions State Decree Central African Republic ☐ article 5, paragraph 2, of the Sanctions State Decree Yemen ☐ article 5, paragraph 2, of the Sanctions State Decree on North Korea ☐ article 5, paragraph 2, of the Sanctions State Decree Cyber-Attacks ☐ article 5, paragraph 2, of the Sanctions State Decree Human Rights Violations ☐ article 5, paragraph 2, of the Sanctions State Decree Chemical Weapons ☐ article 5, paragraph 2, of the Sanctions State Decree Iran	
6.	Relevant UN/EU freezing list(s)		
REPORTABLE PERSON OR ENTITY		**DATA INCLUDED IN SANCTIONS REGULATION OR FREEZING LIST**	**DATA IN ADMINISTRATION OF REPORTING ENTITY**
7.	Name		

8.	Alias		
9.	Address		
10.	Home address or place of business		
11.	Place of birth (if applicable)		
12.	Date of birth (if applicable)		
13.	Description of the service rendered or requested, including (a) the identity of the person or entity who requested the service or on behalf of whom the service was requested; and (b) the identity of the person or entity for or to the benefit of whom the service was requested		
14.	Actions undertaken by reporting entity	☐ Funds or other assets are frozen. ☐ Other, namely ______________.	
15.	*Amount* and *origin* of the funds or other assets that are frozen		
Signature: Date: Name: Position:			

This form must be accompanied with copies of identification documents, company registry extracts and any other documents used to verify the identity of the reportable person or entity pursuant to the State Ordinance for the Prevention and Combating of Money Laundering and Terrorist Financing (AB 2011 no.28). The completed and signed reporting form must be submitted to the Integrity Supervision Department of the Centrale Bank van Aruba via e-mail: **integritysupervision@cbaruba.org**. For completeness sake, a report must also be filed immediately to the FIU-Aruba in case of a positive match.