

HOUSE OF REPRESENTATIVES STANDING COMMITTEE ON ECONOMICS

REVIEW OF THE FOUR MAJOR BANKS

NAB

NAB31QW:

- (a) What information does AUSTRAC require for reporting of the international transfer of funds?
- (b) What data is required to be input for an international transfer of funds?
- (c) What data is required to be input for the verification of an international transfer of funds?
- (d) What difference is there between the data required for an international transfer of funds, and a verified international transfer of funds?
- (e) What information do you provide to AUSTRAC for reporting of the international transfer of funds?
- (f) Do you provide data for verified transactions to AUSTRAC?
- (g) Do you provide data for unverified transactions to AUSTRAC?
- (h) What difference is there between the data required for an international transfer of funds and the data required for AUSTRAC reporting?
- (i) What difference is there between the data required for the verification of an international transfer of funds and the data required for AUSTRAC reporting?

Answer:

a) What information does AUSTRAC require for reporting of the international transfer of funds?

The information that NAB includes in an IFTI report to AUSTRAC is set out in Chapter 16 of the AML/CTF Rules. The required information varies depending on whether the IFTI is into or out of Australia, but generally requires information about the:

1. payer;
2. ordering institution;
3. beneficiary institution;
4. payee;
5. payment instruction; and
6. the payment (e.g. currency and date of transfer).

b) What data is required to be input for an international transfer of funds?

Part 5 of the AML/CTF Act sets out the requirements for data that NAB must include in the payment messages that give effect to IFTIs. The information that must be included differs depending on various factors, including whether the institution is the ordering institution or is an intermediary in the funds transfer chain.

The required information is either the Complete Payer Information (see section 71 of the AML/CTF Act) or the Tracing Information (see section 72 of the AML/CTF Act). Examples of such information include:

- the payer's name;
- the payer's account number;
- a unique reference number for the transfer instruction;
- the payer's full business address; and
- a unique identification number given to the payer by a government.

c) What data is required to be input for the verification of an international transfer of funds?

Currently there is no obligation in the AML/CTF Act to verify information that is included in an international funds transfer instruction (IFTI) Report or an IFTI payment message. There is an obligation to collect the information required for transmission and then report accordingly.

d) What difference is there between the data required for an international transfer of funds, and a verified international transfer of funds?

Please see response in c) above.

e) What information do you provide to AUSTRAC for reporting of the international transfer of funds?

As per the requirements outlined in response a) above. In addition, NAB supplements data for IFTI reports with extra information to AUSTRAC related to the Payer/Ordering Customer, including:

- NAB Customer Number
- Full Name
- Main Address
- Date of Birth
- ABN
- ACN

f) Do you provide data for verified transactions to AUSTRAC?

Please see response in c) above.

g) Do you provide data for unverified transactions to AUSTRAC?

Please see response in c) above.

h) What difference is there between the data required for an international transfer of funds and the data required for AUSTRAC reporting?

NAB provides all mandatory data and optional data if available as part of AUSTRAC IFTI reporting as per response question (a) when the obligation arises. The obligation to submit an IFTI Report applies to the last person to send the IFTI out of Australia (for outgoing instructions) and the first person to receive the IFTI from outside Australia (for incoming instructions).

The difference between the IFTI report data and the data provided in an IFTI payment message will depend on the role the institution plays in the payment message chain (such as the outgoing or incoming instruction).

i) What difference is there between the data required for the verification of an international transfer of funds and the data required for AUSTRAC reporting?

Please see response in c) above.