

CIRCULAR NO. <u>1218</u> Series of 2025

Subject: Regulation on Large Value Cash Transactions

The Monetary Board, in its Resolution No. 929 dated 18 September 2025, approved the regulations on large value cash transactions, specifically providing restrictions and implementing the conduct of enhanced due diligence on large value cash-related payments and transactions.

The Bangko Sentral ng Pilipinas (BSP), in its latest sectoral risk assessment and surveillance monitoring, has noted money laundering (ML), terrorism financing (TF), and proliferation financing (PF) risks arising from cash transactions of banks and other BSP-supervised financial institutions (BSFIs). These disclosed the use and abuse of cash-based transactions to move illicit funds into and out of the financial system. Accordingly, the BSP recognizes the need to further reinforce measures to deter the use of cash for illicit activities and promote the integrity of the financial system.

Section 1. Section 923/923-Q of the Manual of Regulations for Banks (MORB)/Manual of Regulations for Non-Bank Financial Institutions (MORNBFI) is hereby amended to read, as follows:

XXX

Regulation on large value pay outs. BSFIs shall adopt appropriate anti-money laundering/countering terrorism and proliferation financing (AML/CTPF) policies and procedures to strictly implement cash transaction limits and restrictions. In this regard, large value payouts (e.g., withdrawals) of more than Five Hundred Thousand Pesos (P500,000.00) or its equivalent in foreign currency, shall only be made, facilitated, or transacted through check payment, fund transfer, direct credit to deposit accounts, and/or other form using the digital payment platform of the BSFI. The P500,000.00 limit maybe carried out in a single transaction or in series of transactions within one (1) banking day.

BSFIs may, however, adopt lower cash transaction limits based on its institutional ML/TF/PF risk assessment and/or customer financial profile.

In any case, cash transactions exceeding the set threshold shall be subject to the conduct of appropriate enhanced due diligence (EDD) measures provided under Section 921/921Q of the MORB/MORNBFI. BSFIs may, after the exercise of EDD, allow large value payouts in cash of more than P500,000.00 or its equivalent in foreign currency, provided that the customer can submit additional identification information and/or proof of legitimate business purpose or transaction.

If the BSFI fails to satisfactorily complete the EDD procedures; or reasonably believes that performing the EDD process will tip-off the customer, it shall file a suspicious transaction report (STR) and closely monitor the account and review the business relationship. The BSFI shall also consider the alerts, red flags, and suspicious indicators, as well as typologies noted/reported by relevant government agencies, involving large or unusual cash transactions in filing STR.

Section 2. This Circular shall take effect fifteen (15) calendar days following its publication either in the Official Gazette or in a newspaper of general circulation in the Philippines.

FOR THE MONETARY BOARD:

ELI M. REMOLONA, JR.Governor

18 September 2025