PRODUCT DOSSIER · PHILIPPINES REGULATORY INTELLIGENCE

MORB Part IX Policy Library

73 Enacted Policy Statements Over the Complete Register

Dataset ID	PROFYTAI-PH-MORB-PART-IX-POLICY-1.0.0
Version	1.0.0 · Released 2026-07-23
Jurisdiction	Philippines
Issuing Authority	Bangko Sentral ng Pilipinas (BSP)
Instrument	MORB Part IX · AML/CFT Regulations
Coverage	278 obligations · 73 policy groups · 278 evidence captures
Classification	Commercial Regulatory Intelligence · Licensed Distribution

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EXECUTIVE SUMMARY

What This Dataset Is, and Why It Exists.

MORB Part IX Policy Library sits on the Complete stack and adds 73 domain-enacted policy statements. Each statement is written for gap-checking institutional policies against Part IX, with every member obligation still cited and evidence-backed underneath.

Who It Is For

BSP-supervised banks and digital banks, their compliance and AML officers, internal audit, the consultancies that advise them, and the procurement and legal teams that license the data. It suits any institution that must evidence its posture against Part IX.

Why It Exists

Published regulation is authoritative but unstructured: hundreds of AML/CFT duties buried in prose across the Manual. Building a usable, cited register by hand is slow, fragile, and hard to prove. This dataset does that work once, correctly, and ships it as structured data.

EXPECTED BUSINESS OUTCOMES

A defensible register on day one	Replace weeks of reading and re-keying with a complete, cited Part IX obligation set your team reviews rather than builds.
Understanding built in	Every record carries ProfytAI Regulatory Intelligence: a plain-language summary, why the duty exists, and how teams implement it.
Audit-ready provenance	Every duty is quoted verbatim and page-anchored, so a finding traces to the Manual in one step.
Lower key-person risk	BSP's AML/CFT expectations are captured as structured data, not held in one analyst's spreadsheet.

PRIMARY USE CASES

Obligation registers · gap analysis · audit and examination readiness · policy mapping · regulatory change management · evidence collection · AI grounding. Each is expanded later in this dossier.

DATASET OVERVIEW

Coverage, Method, and Provenance at a Glance.

Obligations	278 discrete, individually cited duties
Policy Groups	73 enacted policy statements over the Complete register
Source Document	MORB Part IX · AML/CFT Regulations (BSP, 2023)
Schema	30 top-level fields across the structured layers documented below
Formats	Excel workbook, JSON (versioned, checksummed envelope), CSV
Evidence Captures	Included · one source-verified page capture per obligation (278 captures)
Semantic Enrichment	Compliance checklist, qualifications, and evidence expectations where the source supports them
Update Model	Point-in-time and versioned. Errata reissued free within your version; a new version on BSP reissuance is a new license or the optional annual update subscription
AI Regulatory Intelligence	Generated summary, purpose, relationship, and implementation notes on every record

SOURCE INSTRUMENT

Manual of Regulations for Banks · Part IX	2023	278 obligations · AML/CFT · §§903-941

HOW IT IS BUILT

- **Extraction.** Part IX is parsed from its official BSP PDF into discrete obligations at the clause level, one record per duty.
- **Normalization.** A parallel normalized field prepares the text for search and diffing while the verbatim stays byte-exact for citation.
- **Traceability.** Every record carries a legal citation, the printed page, and a link to the source; Complete and Policy Library also carry a source-verified page image.
- **Update philosophy.** Coverage is point-in-time: the exact text as issued, versioned, with a new dated release on reissuance and a free errata reissue if a confirmed error is found.
- **Quality assurance.** The build rejects any record missing its verbatim or citation and produces byte-identical, checksummed output on every run.

FIELD DICTIONARY

Every Field, Defined.

All 30 top-level fields of the delivery, grouped by structured layer, plus the generated intelligence the JSON carries on every record. Every product folder ships its own DATA_DICTIONARY.md and the full contract in SCHEMA.md.

Identity and Provenance Where the obligation lives and how to find it again.

obligation_id	string	Unique, stable id: BSP.MORB.2023.Sec{section}[.{marker}].p{page}.OBL{n} — framework, section, marker path, printed page, sequence.
obligation_group_id	string	Grouping id joining obligations under one titled subsection.
source	object	Full provenance object: regulator, document, section numbering/titles, printed pages, legal citations, OCR confidence, the release run's extraction_timestamp, and evidence_img_loc (this record's capture).

Layer 1 · Verbatim The legally authoritative text. This is what you cite.

verbatim_text	string	Byte-exact quotation from the source document. Legally authoritative; cite this.

Layer 2 · Normalized The same text prepared for search, diffing, and retrieval.

normalized_text	string	Whitespace-normalized text for search and diffing.

Layer 3 · Parsed Duty The obligation decomposed into who must do what, and how hard.

parsed_requirement	object	Deterministic modal parse: modal (from the verbatim's governing verb), modal_strength, deontic_category, is_negative, plain-language summary.
obligation_type	string	Coarse functional type of the duty (governance / process / reporting).
priority	string	Suggested review priority (low / medium / high).
tags	array	Topical tags for faceted filtering.
obligation_summary	string	One-line plain-language gist. Never replaces the verbatim.
actor	string	The party who must act.
action_required	string	The action the actor must take.
object_of_obligation	string	The thing the action operates on.
covered_person_scope	array	Entities in scope of the obligation.
frequency	string	How often the duty applies, as stated or implied (most commonly 'ongoing').
deadline	string	Explicit deadline where the text states one (often null).
compliance_notes	string	Additional derived compliance notes, where present.

Layer 4 · Consequence and Effectivity What breach costs, and whether the duty is in force.

consequence	object	Consequence of non-compliance: text, sanction_type, severity_hint, is_criminal_offense.
phase	object	Effectivity: effective_date, is_currently_in_force, phasing; derivation labeled.
amendment	object	Amendment reconciliation status and prior-issuance references.

Layer 5 · Semantic Enrichment Typed, source-grounded intelligence. Ships with Complete and Policy Library; previewed in the Free Sample.

compliance_checklist	array	Semantic Enrichment Layer: the obligation's mandatory elements, each byte-verified against the record's own verbatim.
qualifications	array	Semantic Enrichment Layer: typed legal structure (condition precedent / exception / carve-out / proviso duty / consequence) with text and effect.
evidence_expectations	array	Semantic Enrichment Layer: what an examiner would ask for — artifact, recipient, trigger or frequency.

Hierarchy and Context Document tree, reading window, and ProfytAI Regulatory Intelligence.

hierarchy	object	The obligation graph: depth, parent/child/ancestor ids (id-closed within this product), marker path, lead-in flag.
context	object	Reading context plus ProfytAI Regulatory Intelligence: ancestors breadcrumb, printed location, reading window, governing stem + complete governing list, cross-references, and the generated ai_context explanatory layer (summary, why it exists, interpretation notes, implementation considerations).

ProfytAI Regulatory Intelligence Why the duty exists and how teams meet it. Nested under context.ai_context; JSON delivery only.

summary	string	The duty restated in plain language, for a reader who has not read the instrument.
why_this_obligation_exists	string	The supervisory concern the duty addresses.
relationship_to_parent	string	How this duty sits under its governing paragraph or section.
obligation_kind	string	requirement / condition / exception / prohibition / implementation_step.
interpretation_notes	string	Where the wording is load-bearing, and what it does and does not reach.
implementation_considerations	string	How institutions typically satisfy the duty in practice.

THE LOAD-BEARING FIELDS, AND WHY THEY MATTER

obligation_id	A stable join key that survives reissuance, so a duty is trackable across every version of the rulebook.
verbatim_text	The exact words of the regulator, zero paraphrase. The text an examiner accepts.
source.legal_citation	A drop-in citation. Paste it into a register, policy, or audit finding without re-keying.
parsed_requirement.deontic_category	Separates a hard requirement from guidance and a ban.
actor / action_required / object_of_obligation	The duty pre-decomposed into who acts, what they do, and on what.
source.evidence_img_loc	A source-verified page image an auditor accepts as proof. Complete, Policy Library, and Free Sample.
context.ai_context	ProfytAI Regulatory Intelligence: why the duty exists and how teams meet it.

DATA RELATIONSHIPS

How the Data Connects Back to the Regulation.

Every obligation is anchored to its source in four independent ways, so any number your team publishes reconciles to the Manual in seconds.

The Identifier Is an Address

Each `obligation_id` is stable and human-readable. It encodes the regulator, instrument, issuance year, the section marker, the printed page, and the obligation's sequence within that clause. It survives reissuance, so the same duty is trackable across every version of the rulebook.

BSP	MORB	2023	Sec921	p17	OBL1
REGULATOR	INSTRUMENT	ISSUED	SECTION	PRINTED PAGE	OBLIGATION INDEX

Citations

Two citation fields ship on every record: a short drop-in string (`legal_citation`) for registers and workpapers, and a full form (`legal_citation_full`) with the complete document title. Both name the paragraph and the printed page.

Source Traceability

Every record links to the official source and the page it begins on. In Complete and Policy Library, `evidence_img_loc` adds a rendered image of that page with the duty highlighted and a verification footer.

Hierarchy and References

Structural fields (`hierarchy` , `context.ancestors` , `context.location`) place each duty in the document's tree, so a sub-clause carries its parent context and a register can be grouped exactly as Part IX is organised.

Verbatim to Derived

The verbatim text is the root of every record. The normalized text, the parsed duty (actor, action, object), the summary, and the tags are all derived from it and never replace it.

SAMPLE RECORD

See the Data, Not a Description.

One representative record, exactly as delivered. Every record carries the full 30-field structured schema documented in the Field Dictionary; the free 20-obligation sample at profyt.ai/data/morb/free-sample lets your team inspect all of it.

SHOWN BELOW · SELECTED FIELDS FOR READABILITY. SEE THE FIELD DICTIONARY FOR THE COMPLETE RECORD.

MANDATORY **MORB** BSP.MORB.2023.Sec921.b.p17.OBL1

VERBATIM SHALL

> **Whenever EDD is applied as required by this Part, or by the covered person's customer acceptance policy, or where the risk of ML/TF is higher, the covered person shall do all of the following, in addition to profiling of customers and monitoring of their transactions:**

MORB, Sec. 921.b, p. 17 (2023 ed.)

ACTOR	the covered person
ACTION	perform all enhanced due diligence measures
OBJECT	enhanced due diligence measures

CUSTOMER DUE DILIGENCE · Enhanced due diligence (EDD) · p.17

HIGH SEVERITY

Requires a covered person, whenever enhanced due diligence (EDD) is triggered by regulation, its own customer acceptance policy, or heightened ML/TF risk, to carry out a defined set of additional measures on top of ordinary customer profiling and transaction monitoring.

WHAT YOU ARE LOOKING AT

Verbatim	The regulator's exact words. Legally authoritative; this is the text you cite and the text your policy must answer.
Legal Citation	A drop-in citation, paragraph and page. Paste it into a register or an audit finding with no re-keying.
Parsed Duty	The clause pre-decomposed into who must act, what they must do, and on what, ready for a control owner.
Regulatory Intelligence	A plain-language summary of why the duty exists and how teams typically meet it.
Identifier	A stable address that reconciles this record to the Manual and survives reissuance.

EVIDENCE CHAIN

The Record Makes the Claim. The Capture Proves It.

A structured record is a claim; the evidence capture is the proof. Each obligation that ships captures includes a rendered image of its source page, the duty highlighted, stamped with the obligation ID, document, page, and capture attestation.

risk of a customer to ML/TF.

In assessing the risk profile of customers which are juridical entities, the covered person should also consider the financial profile and other relevant information of the active authorized signatories.

The covered person shall document the risk profiling results as well as how a specific customer was profiled and what standard of CDD (reduced average or enhanced) was applied.

b. *Enhanced due diligence* (EDD). Whenever EDD is applied as required by this Part, or by the covered person's customer acceptance policy, or where the risk of ML/TF is higher, the covered person shall do all of the following, in addition to profiling of customers and monitoring of their transactions:

(1) Gather additional customer information and/or identification documents, other than the minimum information and/or documents required for the conduct of average due diligence as enumerated in this Section and Sec. 924.

(a) In case of individual customers:

(i) supporting information on the intended nature of the business relationship/source of funds/ source of wealth (such as financial profile, ITR, Loan Application, Deed of Donation, Deed of Sale, etc.);

(ii) reasons for intended or performed transactions;

(iii) list of companies where he is a stockholder, director, officer, or authorized signatory;

(iv) other relevant information available through public databases or the internet; and

(v) a list of banks where the individual has maintained or is maintaining an account.

(b) In case of entities:

(i) prior or existing bank references;

(ii) the name, present address, nationality, date of birth, nature of work, contact number and source of funds of each of the primary officers (e.g., President, Treasurer);

(iii) volume of assets, other information available through public databases or the internet and supporting information on the intended nature of the business relationship, source of funds or source of wealth of the customer (ITR, Audited Financial Statement, Loan Application, Deed of Donation, Deed of Sale, etc.); and

(iv) reasons for intended or performed transactions.

(2) Conduct validation procedures in accordance with this Section on any or all of the information provided;

(3) Secure senior management approval to commence or continue the business relationship/transacting with the customer;

(4) Conduct enhanced ongoing monitoring of the business relationship by, among others, increasing the number and timing of controls applied, and selecting patterns of transactions that need further examination;

(5) Require the first payment to be carried out through an account in the customer's name with a bank subject to similar CDD standards, where applicable; and

(6) Perform such other measures as the covered person may deem reasonable or necessary.

Manual of Regulations for Banks – Anti-Money Laundering and Combatting the Financing of Terrorism Regulations Page 17

REGULATORY EVIDENCE RECORD profyt.ai

Obligation ID	BSP.MORB.2023.Sec921.b.p17.OBL1	Jurisdiction	Philippines
Framework	MORB	Regulator	Bangko Sentral ng Pilipinas (BSP)
Document	Manual of Regulations for Banks [2023]	Page	17
Section	921.b.p17 - CUSTOMER DUE DILIGENCE	Evidence Captured	2026-07-19T06:15:53Z
Source URL	https://www.bsp.gov.ph/SitePages/Regulations/MORB.aspx		

Source Text Verified - Regulatory obligation located and confirmed in the cited document

CUSTOMER DUE DILIGENCE

BSP.MORB.2023.Sec921.b.p17.OBL1

MORB Part IX · MORB, Sec. 921.b, p. 17 (2023 ed.) · p.17

Evidence included. All 278 captures ship with Complete and Policy Library. The free sample includes its captures so your team can inspect the chain before any commitment.

POLICY LIBRARY

One Enacted Statement Over a Group of Duties.

The Policy Library regroups the Complete register into 73 domain groups. Each group ships one bank-voiced, enacted policy statement for gap-checking institutional policies, with every member obligation still cited underneath.

POLICY STATEMENT

SCOPE OF REGULATIONS - Procedures

BSP.MORB.2023.Sec903.OBL.GRP.01

SCOPE OF REGULATIONS · 4 MEMBER OBLIGATIONS

> **Under Section 20 of the General Banking Law of 2000, the Bank answers for every transaction carried out at its branches and offices, whether located within or outside the Philippines, as fully as if the head office itself had handled it. (a) The Bank and all such branches and offices function together as one (1) unit. (b) Should a host country prevent proper application of this Part, or of any provision of the AMLA, as amended, the TFPSA, or their Implementing Rules and Regulations (IRR), or of other AMLC and Bangko Sentral issuances, because a local law, regulation or supervisory directive stands in the way, the Bank first gives the Bangko Sentral formal notice and furnishes a copy of the applicable law or regulation, or of the supervising authority's directive, and then applies supplementary measures and mitigating controls to contain the ML and TF risks. (c) Where a host country sets weaker minimum AML/CFT requirements, the Bank, along with its foreign branches and its majority-owned subsidiaries abroad, still applies AML/CFT measures aligned with the AMLA and the TFPSA and their respective RIRR, and with other AMLC and Bangko Sentral issuances, so far as the host country's laws and regulations allow.**

MORB 2023, Sec. 903 (SCOPE OF REGULATIONS), pp.2-3 (Bangko Sentral ng Pilipinas)

COMMERCIAL USE CASES

How Teams Put the Data to Work.

The dataset is the structured foundation under the AML/CFT workflows a bank runs every quarter. The same records serve each of them.

Obligation Registers

Stand up a complete, cited Part IX AML/CFT register on day one instead of reading the Manual and re-keying each duty by hand.

Gap Analysis

Map each obligation to an internal policy or control and evidence the gaps, with the source wording attached to every finding.

Audit and Examination Readiness

Walk into a BSP examination with every requirement already located, quoted, and page-anchored to the Manual.

Policy Mapping

Trace each internal policy statement back to the specific Part IX duty it satisfies, and surface duties no policy answers yet.

Regulatory Change Management

Diff a reissued Part IX against the prior version using normalized text and stable identifiers to see exactly what moved.

Evidence Collection

Attach a source-verified page capture to each obligation in your control library so provenance is one click from any record.

Internal Controls

Assign a control owner to each parsed duty (actor, action, object) and monitor coverage across the full obligation set.

Risk Assessment

Weight and prioritise remediation using the modal force, severity, and sanction type carried on every record.

AI and RAG Grounding

Ground a compliance copilot on cited, byte-exact regulatory text your model can quote with a citation, not paraphrase.

Built to Survive Audit Review.

Regulatory data earns its keep in front of an examiner. Every release is engineered so its provenance holds up to that scrutiny.

Extraction	Part IX is parsed from the official MORB PDF into discrete obligations. Extraction is schema-grounded and reviewed, not a bulk text dump: one record per duty, at the clause level a compliance officer would cite.
Byte-Exact Verbatim	Every record carries the source duty quoted exactly. Nothing is paraphrased in the verbatim field; the derived layers never overwrite it.
Normalization	A parallel normalized field cleans whitespace and typography for search, diffing, and retrieval, while the verbatim stays untouched for citation.
Validation Gates	The build rejects any record missing its verbatim text or its legal citation, and asserts every identifier is unique. Traceability is enforced at build time.
Deterministic Build	The same inputs rebuild byte-identical outputs. Every release is reproducible, and a content hash (SHA-256) travels in the JSON metadata so a pipeline can verify the payload it ingested.
Versioning and Errata	Releases are dated and carry a change log. Errata are free within the licensed version. When BSP reissues Part IX, a new dated version is released under a new license, or delivered by the optional annual update subscription.
Known Scope	Coverage is point-in-time: the exact text of Part IX as issued. Derived fields such as explicit deadlines are populated only where the source states them.

LICENSE LADDER

Where This Product Sits.

This dossier describes **MORB Part IX Policy Library** ($12,000 one-time). The full Part IX ladder:

MORB Part IX Free Sample	Free · 20 obligations with evidence, to judge the depth first
MORB Part IX Basic	$2,500 · cited register with Regulatory Intelligence
MORB Part IX Complete	$4,500 · Basic plus semantic enrichment and evidence captures
MORB Part IX Policy Library	$12,000 · Complete plus 73 enacted policy statements

Prices in USD, one-time, single-organization. Purchase and download at profyt.ai/data/morb. This dossier is commercial collateral and is not itself a license.

LICENSING

Terms of Use.

Commercial License	A commercial license for the single legal entity named on the order to use the dataset internally. Affiliates and subsidiaries need their own license or a multi-entity agreement. Full terms travel with every delivery as LICENSE.md.
Permitted Use	Internal compliance, risk, audit, and product use: obligation registers, gap analysis, policy mapping, control libraries, reporting, and AI grounding within the licensed entity.
Redistribution	The dataset may not be resold, sublicensed, or redistributed as data. Redistribution, OEM embedding, and multi-entity terms are available as a separate private offer.
Updates	Each release is a point-in-time, dated version. An optional annual update subscription delivers each new version on reissuance; a confirmed extraction error is corrected and reissued free to licensees of that version.
Support and Assurance	A signed Data Processing Agreement and security documentation are available on request. Licensing and support: support@profyt.ai.

Pricing and procurement channels are published at profyt.ai/data/morb. This dossier is commercial collateral and is not itself a license.

APPENDIX

Definitions and Reference.

GLOSSARY

Obligation	A single, discrete regulatory duty extracted at the clause level: one requirement, one record.
Deontic category	The logical force of a duty: obligation (must), recommendation (should), permission (may), or prohibition (must not).
Modal / modal strength	The RFC-2119-style verb (SHALL, MUST, SHOULD, MAY) and its mapped strength (mandatory, recommended, permitted, prohibited).
Actor / action / object	The parsed duty: the party who must act, the action they must take, and the thing it operates on.
Verbatim	A byte-exact quotation of the source text. Legally authoritative; the field you cite.
Evidence capture	A rendered image of the source page with the obligation highlighted and a verification footer.
Policy statement	A domain-enacted statement in the Policy Library tier, written for gap-checking institutional policies against a group of Part IX duties.
Point-in-time	The dataset reflects Part IX exactly as issued on the release date; updates ship as new dated versions.

ABBREVIATIONS

BSP	Bangko Sentral ng Pilipinas, the issuing authority and financial regulator.
MORB	Manual of Regulations for Banks.
Part IX	Anti-Money Laundering and Combatting the Financing of Terrorism Regulations.
AML / CFT	Anti-Money Laundering / Combatting the Financing of Terrorism.
AMLC	Anti-Money Laundering Council of the Philippines.
OBL	Obligation, the atomic unit of the dataset (one duty per record).
CDD / EDD	Customer Due Diligence / Enhanced Due Diligence.
CTR / STR	Covered Transaction Report / Suspicious Transaction Report.

REFERENCE

The complete, versioned field contract is SCHEMA.md; the generated field reference is DATA_DICTIONARY.md, shipped in every product folder. Source instruments are not redistributed; each delivery's LICENSE.md links to the official BSP versions. Methodology and QA notes travel in the Excel workbook and the README of every folder.

ABOUT PROFYTAI

ProfytAI builds structured regulatory intelligence for financial institutions. We compile a regulator's source documents into examination-ready obligation data: byte-exact quotations, legal citations, parsed duties, and document context on every record, with source-verified evidence captures where they ship. Singapore MAS technology-risk datasets and Philippines BSP MORB Part IX AML/CFT datasets are live today; further jurisdictions are on the roadmap.

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