



**UPU** | UNIVERSAL  
POSTAL  
UNION

## **NON-BINDING REQUEST FOR INFORMATION**

### **ANTI-MONEY LAUNDERING AND COUNTERING FINANCING OF TERRORISM (AML/CFT) SOLUTION FOR POSTTRANSFER PAYMENT SYSTEM**

Issue Date: 5 July 2023  
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## Definitions

In this Non-Binding Request for Information, the following terms shall have the following definitions, unless otherwise stated:

- “Designated Operator” means any governmental or non-governmental entity/entities officially designated by a UPU member country to operate postal services and to fulfil the related obligations arising out of the Acts of the UPU on its territory;
- “Respondent” means any entity expressing its interest in the project for a centralized Anti-Money Laundering and Combat the Financing of Terrorisms solution within the UPU-IP and providing a response to any or all of the areas of information requested by this RFI;
- “RFI” means this document, which is intended to gather information in order to assist the Universal Postal Union in implementing a centralized Anti-Money Laundering and Combat the Financing of Terrorisms solution within the UPU-IP; to assist the Universal Postal Union in establishing the necessary parameters upon which future procurement processes might be issued; and to identify the universe of entities which might be interested in participating in the potential development and/or implementation of the infrastructure and its related services by the Universal Postal Union or its members;
- “RFI Response” means any document lodged by a Respondent in response to this RFI;
- “UPU” means the Universal Postal Union, an intergovernmental organization and specialized agency of the United Nations whose main aim is to secure the organization and improvement of the postal services and to promote in this sphere the development of international collaboration;
- “PosTransfer” refers to the brand name of the international postal payment service of the UPU.
- “PosTransfer Operator” refers to the Postal Operator, designated by a UPU member country, providing the PosTransfer service on its territory..

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### ***Important Notice and Disclaimer***

This RFI and any of its parts, as well as any information, advice or data subsequently provided to the Respondent whether orally or in writing by or on behalf of the UPU, shall be subject to the terms and conditions set out in this RFI or any other specific agreement entered into by the Respondent and the UPU. Therefore, upon having access and receiving any or all of the information contained herein by any means of communication, the Respondent agrees to comply with all the terms and conditions contained herein; the Respondent further acknowledges and agrees that all information contained herein may not be used, copied, reproduced or distributed to any other person for any purpose whatsoever without the prior written consent of the UPU.

This RFI does not constitute an offer nor is it an invitation or solicitation for any Respondent or any other person to become a provider of products or services to the UPU or its member countries. Each Respondent shall make its own independent assessment and investigation of the information contained herein, and should not rely on any statement or on the significance, adequacy or accuracy of any information contained in this RFI.

Furthermore, the information contained herein does not purport to contain all of the data that a Respondent may deem necessary to provide its RFI Response. The information contained herein may not be deemed adequate or appropriate for all prospective Respondents, and it is not possible for the UPU to have regard to the objectives, financial situation and particular needs of each Respondent having access to the information contained herein. Some Respondents may have a better knowledge of, or access through their own business activities to, more information concerning the information requested by this RFI than other Respondents. In all cases, before acting in reliance on any of the information contained herein, the Respondent should conduct its own investigation and analysis in relation to this RFI, as well as to its accuracy, completeness and reliability; in case of doubt, the Respondent should strive to obtain independent and specific assistance from appropriate professional advisers.

In that regard, the UPU makes no representation or warranty as to the accuracy, completeness, reliability and timeliness of any information contained in this RFI. The UPU and any of its agents, employees and consultants shall incur no liability for any statements, opinions, information or matters, expressed or implied, arising out of, contained in or derived from, or any omissions from, the information contained in this RFI except in so far as liability under any statute cannot be excluded. The UPU shall not be responsible for, nor shall it pay for, any costs, expenses or losses which may be incurred by a Respondent or its representatives in conducting their review and evaluation of this RFI, in expressing interest or submitting an RFI Response, or in any other way arising from, or connected with, this RFI.

The information contained in this RFI is of a preliminary nature and subject to clarification and change. The UPU may, at its absolute discretion, update, amend or supplement the information contained in this RFI. The UPU may also, at its absolute discretion, amend or discontinue this RFI or any future procurement processes potentially related thereto at any time and without further notice. All costs related to RFI Responses shall be borne by the Respondents. All references to currency shall be in Swiss Francs (CHF) unless expressly stated otherwise. References to years concern calendar years starting on 1 January and ending on 31 December, unless otherwise stated. No representation made by or on behalf of UPU in relation to this RFI or its contents shall be binding on the UPU unless that representation is made in writing and incorporated into contractual documents to be formed on the basis of this RFI or any subsequent procurement processes issued by the UPU, as the case may be.

Nothing in or relating to this RFI shall be deemed a waiver, express or implied, of any of the privileges and immunities of the UPU.

## Background Information

### 1.1 Introduction

The UPU has developed the PosTransfer: an international payment network connecting postal operators (Designated Operators: DO). The core technology is a central database (UPU Interconnection Platform: UPU-IP) where all payments are recorded.

PosTransfer is mostly a person-to-person international payment service (remittances), and majority of the payments are made in cash (both at origin and at destination). Some of the UPU Designated Operators (DOs) have put in place their own Anti-Money Laundering and Countering Financing of Terrorism (AML/CFT) measures but the demand for a centralized solution that can be plugged into the UPU-IP remains.

### 1.2 The UPU

The postal sector plays a key role in the economic and social development of many countries and continues to provide services critical to the global economy. Indeed, the postal sector globally employs more than five million people and has more than 642,000 retail points across the globe in locations, ranging from major cities to some of the remotest locations on the planet. This represents one of the largest networks in the world.

The UPU, established in 1874 with its headquarters in Berne, Switzerland, is the primary forum for cooperation between postal sector players and helps to ensure a truly universal network of up-to-date international postal products and services. With 193 member countries, this specialized agency of the United Nations fulfils an advisory, liaison and regulatory role and renders technical assistance where needed. It sets the rules for international mail exchanges and makes recommendations to stimulate growth in mail volumes and to improve the quality of service for customers. As an intergovernmental institution, the UPU is called upon to play an important leadership role in promoting the continued revitalization of postal services.

### 1.3 Scope of the request for information

The UPU is launching this Request for Information (RFI) to identify potential solution providers. After analysis of the answers to this RFI, and consultation with its members (designated operators (DOs) operating the PosTransfer), the UPU may decide to launch a formal Call for Tender (CFT).

Providers interested in this RFI are asked to provide answers according to the structure given in sections 2.1 and 2.2 below. Answers to sections 3.4 (pricing and costs) and 2.3 (technical description of the solution) do not impose a specific format. Section 2.4 should be read first to understand how the UPU is planning to integrate the solution.

## 2. Main Requirements of the RFI

### 2.1 Core Requirements

Area	Requirement	Covered?
Technical Multi-tenant solution	Multiple PosTransfer Operators will access the tool. Each PosTransfer Operator must be able to configure:	
	<ul style="list-style-type: none"> <li>Rules. Specifically: select the lists to be checked)</li> </ul>	
	<ul style="list-style-type: none"> <li>Accesses to the system (ex: AML compliance team receiving the alerts) and data visibility (ex: Compliance team of one specific operator must view and act only on data related to their operator)</li> </ul>	

Area	Requirement	Covered?
Technical Multi-language	The solution must provide a user interface in the main languages used by the PosTransfer operators (English, French, Spanish, Russian). The solution must be localizable, on demand, into any other language. The solution must support data provided with different character sets. Data transliteration shall be implemented for data analysis.	
Technical On premises versus Cloud hosting	The UPU is opened to explore either hosting the solution on its premises, or accessing the solution hosted by the vendor (ex: Cloud solution provided by the vendor). Vendor is asked to specify if both models are possible (as well as answering below the costs section) <ul style="list-style-type: none"><li>• On UPU premises</li><li>• Cloud</li></ul>	
Technical Interfaces	Solution must offer a set of Application Programming Interfaces (API) permitting integration with the PosTransfer central database operated by the UPU. Access to these API must be secured. Please explain the technologies in place for this.	
Functional Categories of risk	The solution must manage lists and rules permitting the detection of different categories of risk profiles. Specifically: <ul style="list-style-type: none"><li>• CFT: Combatting the Financing of Terrorism</li><li>• Anti-Money Laundering and more generally all reasons for denying the right of using the financing system</li><li>• Politically Exposed Persons (PEP)</li><li>• Consequently, when the system flags a PosTransfer transaction, it must expose the reason for flagging.</li></ul>	
Functional Data repository	The UPU wants the flexibility of using two different levels of AML checks. The solution must support both. <ul style="list-style-type: none"><li>• Without storing the PosTransfer transaction in the AML solution. With this model the solution checks if one of the two parties (sender or beneficiary) appears in a list of denied parties and returns the information to the UPU system.</li><li>• With storing the PosTransfer transaction in the AML solution. With this model, the solution keeps history of past PosTransfer transactions, and performs more sophisticated AML checks such as:<ul style="list-style-type: none"><li>○ Detection of layering (a transaction between the same sender and the same beneficiary is cut into multiple smaller amounts which individually remain below a threshold, but cumulatively are above the threshold)</li><li>○ Threshold limits: a sender (or beneficiary) sending (receiving) a cumulated amount above a threshold over a period of time</li></ul></li></ul>	

Area	Requirement	Covered?
	<ul style="list-style-type: none"> <li>○ Pattern detection: a sender (not listed on any denied party list) attempting to send PosTranfers to different beneficiaries that are generally listed on denied party lists. Or: a beneficiary (not listed on any denied party list) receiving PosTranfers from different senders that are generally listed on denied party lists.</li> </ul>	
	<ul style="list-style-type: none"> <li>○ With this model, layering, thresholds and pattern detection are not checked uniquely for transactions between the PosTransfer Operator of origin and the PosTransfer Operator of destination, but globally across the PosTransfer network</li> </ul>	
	<ul style="list-style-type: none"> <li>○ Person identification: multiple patterns shall be supported to identify a similar sender (or beneficiary) involved in multiple PosTranfers with different set of information (e.g. identifying person based on name and/or Identity document information, postal address, etc.)</li> </ul>	
Functional Integration model (refer to: integration model diagram, below)	The APIs provided with the solution must, at the time a PosTransfer transaction is submitted to AML screening:	
	<ul style="list-style-type: none"> <li>• Accept as entry parameters the full details of a specific PosTransfer transaction</li> </ul>	
	<ul style="list-style-type: none"> <li>• Return either a risk score or a yes/no assessment on the risk related to the PosTransfer transaction</li> </ul>	
	The APIs provided with the solution must, at the time a final decision is made by the compliance team of the PosTransfer Operator:	
Functional User interface	The solution must provide a user interface, to display the reason why the PosTransfer transaction has been flagged as non-compliant regarding AML. This user interface will be accessed by the compliance team of each PosTranfer operator for a decision (stop or release)	
	Access to this user interface must be secured. Indicate here the technologies used for authenticating and securing accesses.	
Functional List management	The solution must automatically update the lists selected by the PosTransfer Operator, every time a new version of the list is published by the owner of the list.	
Documentation	The solution must come with:	
	<ul style="list-style-type: none"> <li>• Technical documentation, in English: for the APIs and -if UPU selects to host it on its premises- hosting and monitoring requirements</li> </ul>	
	<ul style="list-style-type: none"> <li>• User guide and/or online help for the end users. In English, French, Spanish and Russian</li> </ul>	

## 2.2 Optional Requirements

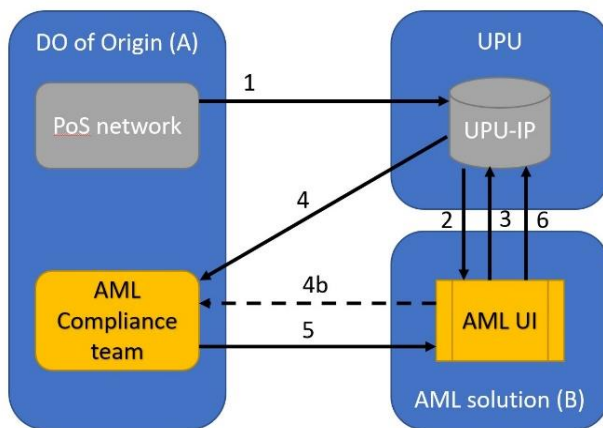
Area	Requirement	Covered?
Functional Alerts	The solution must be able to send alerts (for example, through emails) to the compliance team of a PosTransfer Operator when a transaction has been flagged as non-compliant.	
Functional Know Your Customers (KYC)	The solution must provide a customer database, where details about senders and beneficiaries of PosTransfer transactions can be recorded, and reused for future transactions.	

## 2.3 Technical Specifications

Describe in this section the architecture of the solution, the technology stack, and in the case of hosting on UPU premises (give the minimum technical requirements for hosting the solution).

Include the list of APIs and their I/O parameters.

### 2.4 Integration Model Diagram



Notes:

- (A) Scenario on the slide is illustrating the PosTransfer Operator of Origin, when sending a payment, but can be totally similar with the PosTransfer Operator of Destination, when receiving a payment
- (B) The AML solution can be external to UPU as illustrated here (subscription model) or purchased and on premise: it does not modify the scenario described on the slide

- (1) PosTransfer Operator of Origin sends the PosTransfer to UPU-IP. It is automatically assigned to "pre-processing for AML" (it means: not payable by destination PosTransfer Operator)
- (2) UPU-IP sends the PosTransfer for AML screening. The AML engine calculates the risk score according to the lists and other parameters that the PosTransfer Operator of Origin has decided (PosTransfer Operator profile in the AML engine)
- (3) AML score is returned to the UPU-IP. If the score is below the threshold, the system considers "no risk" and the PosTransfer is automatically released for payment. If the score is above the threshold, the PosTransfer remains in "pre-processing for AML" and process continues with step 4
- (4) UPU-IP sends a push notification to the AML compliance team to inform about the PosTransfer put on hold. Alternately, this notification can be sent by the AML solution (4b)
- (5) AML compliance team (AMLCT) connects to the AML solution and accesses all information for making a decision. AMLCT finally estimates it's a "false positive" and decides to release the PosTransfer
- (6) AML returns a revised score to UPU-IP. PosTransfer is released for payment

## 3. Conditions of Response and Rules Governing the Submission of RFI Responses

### 3.1 Process overview

This RFI may, at the sole discretion of the UPU, be followed by Requests for Proposal relating to a centralized Anti-Money Laundering and Combat the Financing of Terrorisms solution within the UPU-IP (UPU Interconnection Platform). The submission of a RFI Response may lead to additional clarifications to be requested from the Responder.



### 3.2 Contact details for inquiries related to this RFI

Respondents shall send their respective RFI responses and related enquires by **4 August 2023** to the following contact person:

Secretary of the Tenders and Procurements Committee  
Universal Postal Union  
International Bureau  
Weltpoststrasse 4  
3015 BERNE  
SWITZERLAND

E-mail: [caa@upu.int](mailto:caa@upu.int)

Any other communication (including unsolicited submissions or promotional and advertising activities) between Respondents and the staff of the International Bureau of the UPU concerning this RFI process shall not be allowed except with the prior written consent of the contact person specified above. Any such unauthorized communication with the UPU may lead to disqualification of a Respondent from further participation in the “AML/CFT Solution for PosTransfer” project.

As the case may be, Respondents may be individually contacted by the UPU to answer specific questions and to discuss materials submitted. In addition, they may be invited to give a presentation to the UPU at its headquarters located in Berne, Switzerland.

**PLACE FOR LODGEMENT:** All RFI Responses, on an exceptional basis, be submitted to the UPU by e-mail (electronic format) **ONLY** at [caa@upu.int](mailto:caa@upu.int) with “**AML/CFT Solution for PosTransfer**” as the subject line, and in conformity with the format and conditions of the RFI Response as detailed below.

**ISSUE DATE:** 5 July 2023

**CLOSING TIME AND DATE:** 4 August 2023 at 16.00 CEST.

The UPU shall not take into consideration any responses received after this date and time.

Furthermore, it shall not accept any responses sent to any e-mail address other than that specified above or sent by any other means. There shall be no charge to the UPU for the preparation and submission of responses to this RFI.

### 3.3 Contents and documents contained in the RFI Response

The RFI Response shall be submitted electronically via email in the English language only, in Word (.doc) or PDF formats, and be structured in the following manner:

- A cover letter including a brief summary of the RFI Response, including a clear indication of the specific areas being approached in the RFI Response, as well as a detailed list and description of all supporting documentation included in the RFI Response;
- The main RFI Response, covering any or all of the areas of information requested by this RFI.

Respondents are requested to provide information on any past experiences and references in the areas covered by the “anti-money laundering and combat the financing of terrorism” solution for international payment systems; this should include if possible the reference information of the customer.

Any RFI Response received by the UPU shall be treated as a public document and be shared with UPU member countries and their Designated Operators. In case the Respondent sends any proprietary or copyrighted material as part of its RFI Response to the UPU (indicated as such), the Respondent acknowledges and agrees that the UPU shall be granted a non-exclusive, unrestricted, gratuitous and worldwide license for use of any such material by the UPU for the purposes of this RFI or other related UPU procurement processes, including without limitation the right to use, publish, reproduce, distribute and incorporate the contents of any RFI Response in future UPU documents or procurement processes related to the PosTransfer project. The Respondent shall also specify the conditions under which any proprietary or copyrighted material contained and duly specified in its RFI Response may be used for any other purposes by the UPU.

### 3.4 Costs and Preparation of the RFI response

Respondents are required to provide the pricing model and fees for:

- Using the solution on UPU premises,
- Accessing and using the solution (hosted for example on Cloud services).

Identification of additional costs for integration (deployment project).

All pricing information should be provided **exclusively in Swiss Francs (CHF)**.

The UPU shall neither be responsible for, nor pay for, any expense or loss which may be incurred by Respondents in the preparation and submission of their RFI Response. Respondents shall be responsible for fully informing themselves in relation to all matters arising from this RFI.

### 3.5 Acceptance Conditions

The UPU shall not be bound to accept any RFI Response nor consider it for future UPU procurement processes.

### 3.6 Tentative Follow-up Schedule

Conclusion of review of RFI Responses	<b>11 August 2023</b>
Follow-up with selected Responders (as the case may be)	<b>August 2023</b>

Note: The UPU reserves the right to change any date in this RFI at its absolute discretion.