

Reporting to MROS: duty, right and procedure

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Every Swiss financial intermediary that develops a well-founded suspicion of money laundering must report it to the Money Laundering Reporting Office Switzerland (MROS). The number of reports has almost quadrupled since 2020, while the duty has been extended to further professions and its breach increasingly leads to convictions of individuals. This article sets out the legal basis of the obligation, the figures published by MROS and the questions they raise.

1 The legal basis

Swiss anti-money laundering law rests on two pillars. The criminal pillar consists of Articles 305bis and 305ter of the Swiss Criminal Code (SCC), introduced in 1990, which punish money laundering and lack of due diligence in financial transactions. Money laundering requires a predicate offence, whose range has widened over successive revisions. Since 1 January 2016, under the Federal Act of 12 December 2014 implementing the revised recommendations of the Financial Action Task Force (FATF), an aggravated tax offence involving at least 300,000 francs of evaded tax per tax period qualifies as a predicate offence.

The preventive pillar is the Federal Act of 10 October 1997 on Combating Money Laundering and Terrorist Financing (Anti-Money Laundering Act, AMLA), in force since 1 April 1998. Articles 3 to 8 impose due diligence duties on financial intermediaries: verifying the identity of the contracting party, identifying the beneficial owner, clarifying the purpose of the business relationship, applying enhanced diligence to higher risks, keeping documentation and maintaining an adequate organisation. The AMLA also imposes the duty to report to MROS, which is attached to the Federal Office of Police. A report is required when there are well-founded grounds to suspect that assets are connected with a money laundering offence, derive from a felony or an aggravated tax offence, or are linked to the

financing of terrorism. The act also provides for the blocking of assets in certain cases.

These duties are given concrete form by the FINMA Anti-Money Laundering Ordinance (AMLO-FINMA), by the banks' Agreement on the Swiss Banks' Code of Conduct with regard to the Exercise of Due Diligence and by the regulations of self-regulatory organisations. Banks, portfolio managers, securities firms, insurers, fund managers and non-bank intermediaries such as fiduciaries, payment service providers and precious metals dealers are subject to them. On 26 September 2025 Parliament adopted a revision that extends due diligence duties to certain advisory activities of lawyers, notaries and other advisers, with arrangements to protect legal professional privilege.

2 What the figures show

According to its annual report for 2025, MROS received 21,087 suspicious activity reports in that year, an average of 82 per working day and an increase of 39.3 % on the 15,141 reports of 2024. Since the goAML information system was introduced in January 2020, the volume has almost quadrupled. Intermediaries in the banking sector filed 91.3 % of the 2025 reports, each of which concerned on average 1.8 business relationships. The same report states that MROS forwarded 1,375 cases to the prosecution authorities in 2025, an increase of 31.5 %.

The progression has been continuous. The MROS annual reports record 7,639 reports in 2022, 11,876 in 2023, 15,141 in 2024 and 21,087 in 2025. Its report for 2024 adds that 21.7 % of the reports filed that year were made under the right to report in Article 305ter(2) SCC. In 5.6 % of cases, intermediaries stated that they had broken off negotiations on a new business relationship because of a well-founded suspicion. Crypto-assets and digital assets account for a growing share. MROS counted 1,799 reports linked to virtual currencies in 2024, up from 1,192 in 2023, and 2,873 in 2025, an increase of 59.7 %. The national risk assessment on crypto-assets published by the Federal Department of Justice and Police in January 2024 put their share at about 10 % of reports between 2020 and 2022, and at no less than 13.8 % in 2022 alone.

Reporting is also an international channel. MROS exchanges information with its counterparts in the Egmont Group. In 2024 it received 780 requests from 96 foreign financial intelligence units, according to its annual report for that year. Its report for 2025 records 932 spontaneous disclosures received from abroad, an increase of 24.1 %.

3 Reading the numbers with care

Several factors explain the growth: stricter supervisory practice, an expanded reporting obligation, greater awareness among intermediaries, better detection tools and a tendency to report out of caution in order to forestall criticism. The volume raises the question whether MROS and the prosecution authorities can process it and how effective the system really is. An analysis published by the Haute École Arc on 14 May 2025 noted that the number of cases forwarded to the criminal authorities fell in 2023 to 866, down from 1,232 in 2022. The same analysis observed that statistics on court judgments, published until 2018, are no longer available.

Figures from different sources do not always match. *Allnews*, in an article of 2 May 2025, gave a slightly different total for 2024 from the one in the MROS annual report, which is the figure used here. Readers comparing years should therefore work from the MROS reports themselves.

4 Personal exposure of compliance staff

Breaching the reporting duty is a criminal matter for the individuals concerned. Citing a presentation by Doris Hutzler of 8 June 2023, the Haute École Arc reported that the Federal Department of Finance and the Federal Criminal Court handed down at least twenty-one final convictions for breach of the duty to report between 2014 and 2022. Forty-seven proceedings were pending at the end of 2022. Compliance officers, including those at lower levels of the hierarchy, are now called to account personally.

The obligation sits at the end of a structured process. At onboarding, the intermediary verifies identity, identifies the beneficial owner, classifies the risk and documents the source of funds and wealth. Automated monitoring then flags unusual transactions, which analysts examine and clarify. Relationships are reviewed periodically, more often where risks are higher. When a well-founded suspicion emerges, the intermediary reports to MROS, continues or ends the relationship under the applicable rules and blocks the assets where the law so provides. Relationships with foreign politically exposed persons are always treated as higher-risk under Article 13(3) AMLO-FINMA, with admission decided at the highest level of management under Article 19.

5 What to take from it

Volume keeps rising. MROS received 21,087 reports in 2025, almost four times the level before goAML was introduced in 2020, with banks filing more than nine in ten.

Output lags input. Forwarded cases rose to 1,375 in 2025, although the gap between reports and prosecutions has prompted questions about the system's effectiveness.

Liability is personal. At least twenty-one final convictions for failure to report between 2014 and 2022 show that the duty binds the individuals who handle suspicions as well as their institutions.

6 Sources

- Swiss Criminal Code, Articles 305bis and 305ter, introduced in 1990.
- Federal Act of 12 December 2014 implementing the revised FATF recommendations of 2012 (aggravated tax offence as predicate offence from 1 January 2016).
- Federal Act of 10 October 1997 on Combating Money Laundering and Terrorist Financing (AMLA, SR 955.0), in force 1 April 1998.
- FINMA Anti-Money Laundering Ordinance (AMLO-FINMA, SR 955.033.0), Article 13.
- MROS, *Annual Reports* 2022, 2023, 2024 and 2025, fedpol.admin.ch.
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- « Forte augmentation des annonces de blanchiment d'argent en Suisse en 2024 », *Allnews*, 2 May 2025.
- Federal Council, press release of 15 October 2025, and « Blanchiment d'argent en Suisse : nouvelles obligations du conseiller », Croce & Associés, 20 October 2025 (revision adopted 26 September 2025).

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