



BANGKO SENTRAL NG PILIPINAS

OFFICE OF THE GOVERNOR

MEMORANDUM NO. M-2026-005

To : All BSP-Supervised Financial Institutions (BSFIs)

Subject : Clarification on the Implementation of BSP Circular 1218, Series of 2025 (Regulation on Large Value Cash Transactions)¹

In implementing the enhanced due diligence (EDD) requirements under BSP Circular No. 1218,² BSFIs shall conduct EDD for cash withdrawals exceeding ₱500,000, on a per customer basis, instead of per transaction basis. This shall cover the customer's usual business transactions.

BSFIs may also adopt streamlined EDD considering the customer's risk profile, nature of business or operations, and transaction patterns. Streamlined EDD may be applied to bank-to-bank transactions, such as inter-branch or inter-bank cash requirements, or loan disbursements. For cash payouts or withdrawals during declared calamities/emergencies, certification from the head of agency may be obtained. Meanwhile, more rigorous EDD shall be applied when transactions deviate from a customer's expected behavior or present heightened risks.

BSFIs must ensure that EDD procedures do not unduly delay legitimate transactions by streamlining processes and providing branch personnel with targeted training to promote consistent, efficient, and effective implementation.

For guidance and strict implementation.

ELI M. REMOLONA, JR.
Governor

6 February 2026

¹ <https://www.bsp.gov.ph/Regulations/Issuances/2025/1218.pdf>

² Including BSP Memorandum No. M-2025-036 dated 30 October 2025 containing the Frequently Asked Questions on the Regulation on Large Value Cash Transactions