

19 November 2025

By e-mail: [REDACTED]

Dear [REDACTED]

Official Information Act 1982 Request (OIA) – Information relating to the technology and associated costs utilised by the FMA AML/CFT Supervisory Team in the course of performing their role as an AML/CFT Supervisor

We refer to your OIA request dated 23 October 2025, and to your OIA request we received from the Ministry of Justice on 13 November 2025, requesting for the following information under the Official Information Act 1982 (OIA):

1. Descriptions of the technology that the AML/CFT Supervisory Team relies on for performing its role as an AML/CFT Supervisor;
2. Approximate costs associated with the use of such technology, including any developmental costs; and
3. Expenses related to the development and/or maintenance of technology for the purposes of the FMA's role as an AML/CFT Supervisor.

OIA Response

We have considered your request pursuant to Part 2 of the OIA and based on the review of the records and information available in our system, have decided to grant your request.

1. Descriptions of technology utilised by the AML/CFT Supervisory Team

a. Manawataki

Manawataki is the FMA's core operational Customer Relationship Management (CRM) platform, which is used to track and record stakeholder interactions, manage cases, and store intelligence about entities and market participants. The platform is built on Microsoft Dynamics 365 and supports the licensing, supervision and enforcement functions of the FMA.

b. PowerBI Dashboards

The AML/CFT function utilises PowerBI dashboards for the following two purposes:

- i) AML/CFT Risk Dashboard – This examines the AML/CFT annual returns and assigns a risk score to each reporting entity according to a set of criteria. It builds an interactive report that can be used to search for relationships between a number of AML/CFT-related criteria; and
- ii) AML/CFT Reporting Entities Report – This provides an overview of AML/CFT reporting entities.

c. *AML/CFT Annual Report Form*

This is an online form that the AML/CFT function provides for reporting entities to complete annual reports.

d. *RelativityOne*

This is FMA's evidence management and eDiscovery platform used for storing, reviewing and managing documents related to investigations and compliance. The FMA uses RelativityOne to manage investigation records, including active and resolved cases.

e. *Microsoft365*

Microsoft365 is utilised by the whole FMA organisation to collaborate and manage work, documents and records.

2. Please advise the approximate cost of this technology including development costs if relevant

a. *Manawataki*

Manawataki is used throughout the FMA for multiple functions. There has not been any specific development cost for the AML/CFT function of Manawataki. The annual licencing of Manawataki for the AML/CFT team is \$5,354.24.

b. *PowerBI Dashboards*

The PowerBI dashboards utilised by the AML/CFT team were developed inhouse by salaried staff. This development of this resource was not tracked and thus we are not able to provide an approximate cost for this development.

c. *AML/CFT Annual Report Online Form*

The online form was developed as part of a broader eservices offering. The development cost attributed solely to the AML/CFT function was \$173,584.43 in 2014. The online form was further developed in 2021 to migrate the form to the FMA's digital cloud service for an approximate cost of \$151,200.

d. *RelativityOne*

There has not been any specific development cost for AML/CFT, and the AML/CFT team do not have licenses for this tool.

e. *Microsoft365*

While there has not been any specific Microsoft365 development for the AML/CFT function, the cost of licensing the AML/CFT team is \$3,182.88.

3. Over the past 10 years, please list the cost or expenditure value for the development and/or maintenance of technology for the purposes of the FMA's role as an AML/CFT Supervisor

The only development cost associated with the AML/CFT function in the last 10 years involved the migration of the AML/CFT Annual Report Online Form to the FMA's digital cloud service, which took place in 2021. The cost of the development was approximately \$151,200.

Questions

Please let me know if you have any questions about our decision under the Official Information Act. We also note that you have the right to complain to the Ombudsman regarding our assessment of our OIA request, in accordance with section 28 of the Official Information Act. Information about how to make a complaint is available at www.ombudsman.parliament.nz or phone 0800 802 602.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jasveet Sandhu', written in a cursive style.

Jasveet Sandhu
Senior Legal Counsel, Internal Governance