

Financial Transactions and Centre d'analyse des opérations et déclarations financières du Canada

## **Guideline 3A: Submitting Suspicious Transaction Reports to FINTRAC Electronically**



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## December 2016

This replaces the previous version of *Guideline 3A: Submitting Suspicious Transaction Reports to FINTRAC Electronically* issued in July 2016. Upcoming changes to this guideline are described below.

- Field B1.11, "ID number of the person initially identifying a suspicious transaction", will be removed. As of June 17, 2017, FINTRAC will no longer collect this information.
- Regulatory amendments come into force on June 17, 2017, that clarify what is to be reported in fields for information about individual clients and corporations. Fields D14, D15, F15 and F16 will refer to "jurisdiction" of issue instead of "place" of issue. Fields E10 and E11 will refer to "jurisdiction" of incorporation instead of "place" of incorporation.

The field descriptions will be updated to reflect these changes once they are in force in June 2017.

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## 1 General

The objective of the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (the Act) is to help detect and deter money laundering and the financing of terrorist activities. It is also to facilitate investigations and prosecutions of money laundering and terrorist activity financing offences. This includes reporting, record keeping, client identification and compliance regime requirements for individuals and entities described in section 2.

If you are such an individual or entity, this guideline has been prepared to help you submit suspicious transaction reports electronically. It explains reporting timelines, how reports have to be sent to the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC), and what information has to be included in these reports.

This guideline uses plain language to explain the most common reporting situations under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* as well as the related regulations. It is provided as general information only. It is not legal advice, and is not intended to replace the Act and Regulations. For more information about money laundering, terrorist financing or other requirements under the Act and Regulations, see the guidelines in this series:

- *Guideline 1: Backgrounder* explains money laundering and terrorist financing and their international nature. It also provides an outline of the legislative requirements as well as an overview of FINTRAC's mandate and responsibilities.
- *Guideline 2: Suspicious Transactions* explains how to report a suspicious transaction. It also provides guidance on how to identify a suspicious transaction, including general and industry-specific indicators that may help when conducting or evaluating transactions.
- Guideline 3: Submitting Suspicious Transaction Reports to FINTRAC explains when and how to submit suspicious transaction reports. There are two different versions of Guideline 3, by reporting method.
- *Guideline 4: Implementation of a Compliance Regime* explains the requirement for reporting entities to implement a regime to ensure compliance with their obligations under the Act and associated regulations.
- *Guideline 5: Submitting Terrorist Property Reports to FINTRAC* explains to reporting entities when and how to submit terrorist property reports.
- *Guideline 6: Record Keeping and Client Identification* explains the requirement for reporting entities to identify their clients and keep records. There are several different versions of Guideline 6, with each one applicable to a particular sector.
- *Guideline 7: Submitting Large Cash Transaction Reports to FINTRAC* explains when and how to submit large cash transaction reports. There are two different versions of Guideline 7, by reporting method.

- Guideline 8: Submitting Electronic Funds Transfer Reports to FINTRAC explains when and how to submit electronic funds transfer reports. There are three different versions of Guideline 8, by type of electronic funds transfer and reporting method.
- Guideline 9: Submitting Alternative to Large Cash Transaction Reports to FINTRAC explains when and how financial entities can choose the alternative to large cash transaction reports. This is only applicable to financial entities.
- *Guideline 10: Submitting Casino Disbursement Reports to FINTRAC* explains when and how to submit casino disbursement reports. There are two different versions of Guideline 10, by reporting method.

If you need more help after you read this or other guidelines, call FINTRAC's national toll-free enquiries line at 1-866-346-8722.

Throughout this guideline, several references are provided to additional information that may be available on external Web sites. FINTRAC is not responsible for the accuracy or reliability of the information contained on those external Web sites. The links provided are based on information available at the time of publishing of this guideline.

Throughout this guideline, any references to dollar amounts (such as \$10,000) refer to the amount in Canadian dollars or its equivalent in foreign currency. Furthermore, all references to cash mean money in circulation in any country (bank notes or coins). In this context, cash does not include cheques, money orders or other similar negotiable instruments.

For information about what is a suspicious transaction, please refer to *Guideline 2: Suspicious Transactions*.

# 2 Who Has to Send a Suspicious Transaction Report to FINTRAC?

If you are one of the following individuals or entities (called reporting entities), you must report suspicious transactions to FINTRAC.

## 2.1 Financial entities

Financial entities are banks (that is, those listed in Schedule I or II of the *Bank Act*) or authorized foreign banks with respect to their operations in Canada, credit unions, caisses populaires, financial services cooperatives, credit union centrals (when they offer financial services to anyone other than a member entity of the credit union central), trust companies, loan companies and agents of the Crown that accept deposit liabilities.

If you are a financial entity and you have foreign subsidiaries or foreign branches, the suspicious transaction reporting requirement does not apply to their operations outside Canada.

## 2.2 Life insurance companies, brokers and agents

A life insurance company means one regulated by provincial legislation, or a life company or foreign life company under the *Insurance Companies Act*. A life insurance broker or agent means an individual or entity registered or licensed provincially to carry on the business of arranging contracts of life insurance.

If you are a life insurance company and you have foreign subsidiaries or foreign branches, the suspicious transaction reporting requirement does not apply to their operations outside Canada.

## 2.3 Securities dealers

A securities dealer is an individual or entity authorized under provincial legislation to engage in the business of dealing in securities or any other financial instruments or to provide portfolio management or investment advising services.

If you are a securities dealer and you have foreign subsidiaries or foreign branches, the suspicious transaction reporting requirement does not apply to their operations outside Canada.

## 2.4 Money services businesses

A money services business means an individual or entity engaged in the business of any of the following activities:

- foreign exchange dealing;
- remitting or transmitting funds by any means or through any individual, entity or electronic funds transfer network; or
- issuing or redeeming money orders, traveller's cheques or other similar negotiable instruments. This does not include redeeming cheques payable to a named individual or entity. In other words, cashing cheques made out to a particular individual or entity is not included.

Money services businesses include alternative money remittance systems, such as Hawala, Hundi, Chitti, etc.

For more information about who is engaged in the money services business, see the FINTRAC Interpretation Notice No. 1, available under "General publications" on the Publications page of FINTRAC's Web site (<u>http://www.fintrac-canafe.gc.ca</u>).

## 2.5 Agents of the Crown

Agents of the Crown are government departments or agents of her Majesty in right of Canada or of a province. If you are an agent of the Crown that sells or redeems money orders in the course of providing financial services to the public, you are subject to the reporting requirements explained in this guideline.

If you are an agent of the Crown that accepts deposit liabilities in the course of providing financial services to the public, such as a provincial savings office, you are considered a financial entity (see subsection 2.1).

If you are an agent of the Crown that sells precious metals to the public, you are considered a dealer in precious metals and stones (see subsection 2.9).

### 2.6 Accountants and accounting firms

An accountant means a chartered accountant, a certified general accountant or a certified management accountant. An accounting firm means an entity that is in the business of providing accounting services to the public and that has at least one accountant who is a partner, an employee or an administrator.

If you are an accountant or an accounting firm, you are subject to the reporting requirements explained in this guideline when conducting any of the following activities on behalf of any individual or entity (other than your employer) or giving instructions in respect of those activities on behalf of any individual or entity (other than your employer):

- receiving or paying funds;
- purchasing or selling securities, real property or business assets or entities; or
- transferring funds or securities by any means.

You are not subject to these obligations for the receipt of professional fees. This means that the receipt of professional fees does not trigger your obligations. However, you are subject to the reporting requirements when you engage in any of the activities mentioned above, regardless of whether or not you received any fees or have a formal letter of engagement to do so. In other words, you are subject to the obligations even if you were doing the activities on a volunteer basis.

Activities of accountants or accounting firms other than those listed above, such as audit, review or compilation engagements carried out according to the recommendations in the Canadian Institute of Chartered Accountants (CICA) Handbook, do **not** trigger reporting obligations.

Giving advice to a client, in the context of your accountant-client relationship, is not considered providing instructions. If you need further clarification about this, refer to FINTRAC Interpretation Notice No. 2, available under "General Publications" on the Publications page of FINTRAC's Web site (<u>http://www.fintrac-canafe.gc.ca</u>).

Providing bankruptcy services or acting as an insolvency practitioner does not trigger reporting obligations. If you need further clarification about this, refer to FINTRAC Interpretation Notice No. 7, available under "General Publications" on the Publications page of FINTRAC's Web site.

## 2.7 Real estate

#### Real estate brokers or sales representatives

Real estate brokers or sales representatives are individuals or entities that are registered or licensed in a province to sell or purchase real estate. They are subject to the reporting requirements explained in this guideline when they act as an agent regarding the purchase or sale of real estate. This includes the buying or selling of land, buildings, houses, etc. Such activities trigger these obligations whether or not the real estate broker or sales representative gets a commission for the real estate transaction and whether or not they have fiduciary duties regarding it.

If you are a real estate broker or sales representative, these obligations do not apply to you for activities related to property management. This means that if you only deal in property management transactions, such as leases or rental management, not purchases or sales, the obligations explained in this guideline do not apply to you.

### Real estate developers

A real estate developer means an individual or an entity other than a real estate broker or sales representative, who in any calendar year after 2007 has sold one of the following to the public:

- at least five new houses or condominium units;
- at least one new commercial or industrial building;
- at least one new multi-unit residential building each of which contains five or more residential units; or
- at least two new multi-unit residential buildings that together contain five or more residential units.

If you are a real estate developer, you are subject to the reporting requirements when you sell any of the following to the public:

- a new house;
- a new condominium unit;
- a new commercial or industrial building; or
- a new multi-unit residential building.

If you are an entity that is a corporation, you are subject to this whether you sell those buildings on your own behalf or on behalf of a subsidiary or affiliate. In this context, an entity is affiliated with another entity if one of them is wholly-owned by the other, both are wholly-owned by the same entity or their financial statements are consolidated.

## 2.8 Casinos

Casinos are those authorized by a Canadian provincial, territorial or federal government to do business and that conduct their business in a permanent establishment. It only includes those where roulette or card games are played in the establishment, or where there is a slot machine. For these purposes, a slot machine does not include a video lottery terminal.

Registered charities may be authorized to carry on business temporarily as a casino for charitable purposes. If this type of business is carried out in the establishment of a casino for no more than two consecutive days at a time under the supervision of the casino, the activities are considered to be the supervising casino's. In this case, the supervising casino is responsible for the reporting requirements and other obligations related to the charity casino.

## 2.9 Dealers in precious metals and stones

A dealer in precious metals and stones (DPMS) means an individual or an entity that buys or sells precious metals, precious stones or jewellery, in the course of its business activities. Precious metals include gold, silver, palladium or platinum whether in coins, bars, ingots, granules or in any other similar form. Precious stones include diamonds, sapphires, emeralds, tanzanite, rubies or alexandrite. Jewellery means objects made of precious metals, precious stones or pearls intended for personal adornment.

If you are a DPMS, you are subject to the reporting requirements explained in this guideline if you engage in the purchase or sale of precious metals, precious stones or jewellery in an amount of \$10,000 or more in a single transaction. However, you are not subject to the reporting requirements when you engage in a purchase or sale carried out for, in connection with, or for the purpose of manufacturing jewellery, extracting precious metals or precious stones from a mine or cutting or polishing precious stones.

An agent of the Crown (that is, a government department or an agent of her Majesty in right of Canada or of a province) is considered to be a DPMS when it sells precious metals to the public in an amount of \$10,000 or more in a single transaction.

## 2.10 British Columbia notaries

A British Columbia notary means a British Columbia notary public or a British Columbia notary corporation. In this context, a notary public means an individual who is a member of the Society of Notaries Public of British Columbia. Also in this context, a notary corporation means an entity that provides notary services to the public in British Columbia under the *Notaries Act* of that province.

If you are a British Columbia notary, you are subject to the reporting requirement explained in this guideline when you engage in any of the following activities on behalf of any individual or entity (other than your employer), or give instructions on behalf of any individual or entity (other than your employer):

- receiving or paying funds (other than those received or paid for professional fees, disbursements, expenses or bail);
- purchasing or selling securities, real property or business assets or entities; or
- transferring funds or securities by any means.

## 2.11 Employees of a reporting entity

For the purposes of suspicious transactions only, an employee of any of the reporting entities described above is also a "reporting entity". This requires you to make a report to FINTRAC about a suspicious transaction unless you reported it to your superior.

If you are an employee and you have to submit a suspicious transaction report on your own behalf (that is, not on behalf of your employer), refer to *Guideline 3B: Submitting Suspicious Transaction Reports to FINTRAC by Paper.* 

## 3 Suspicious Transaction Reporting Requirements

### 3.1 Electronic reporting enrolment

As a reporting entity, you have to be enrolled with FINTRAC's electronic reporting system to report electronically. FINTRAC will provide you with an identifier number to include in your reports.

For more information about FINTRAC's electronic reporting system enrolment, contact us as explained in section 7.

## 3.2 Suspicious transaction reporting timelines

If you are a reporting entity as described in section 2, you have to send a suspicious transaction report to FINTRAC when there are reasonable grounds to suspect that a transaction or an attempted transaction is related to the

commission or the attempted commission of a money laundering offence or a terrorist financing offence.

There is no minimum threshold amount for reporting a suspicious transaction. *Guideline 2: Suspicious Transactions* has more information on how to identify a suspicious transaction.

You have to submit suspicious transaction reports to FINTRAC, containing specific information (see section 5). Once you have determined that there are reasonable grounds to suspect that the transaction or attempted transaction is related to a money laundering or terrorist financing offence, your report, including all required and applicable information, must be sent within 30 calendar days.

This 30–day reporting time limit begins when you or any one of your employees first detects a fact about a transaction that constitutes reasonable grounds to suspect that it is related to the commission of a money laundering or terrorist financing offence. If such a fact is detected at the time of the transaction, the reporting timeline begins at the time of the transaction. However, if the fact is not detected at the time of the transaction, the 30–day time limit could begin at some time after. For example, if the fact were detected during a review by corporate security after the transaction took place, the 30–day time limit would begin when corporate security first detected the fact.

## 3.3 Other reports

Information about other reporting requirements under the *Proceeds of Crime* (*Money Laundering*) and *Terrorist Financing Act* that apply to reporting entities can be found in the following guidelines:

- Guideline 5: Submitting Terrorist Property Reports to FINTRAC
- Guideline 7: Submitting Large Cash Transaction Reports to FINTRAC
- Guideline 8: Submitting Electronic Funds Transfer Reports to FINTRAC
- Guideline 10: Submitting Casino Disbursement Reports to FINTRAC

## 3.4 Means of reporting to FINTRAC

#### **Electronic reporting**

As a reporting entity, you have to submit all reports on suspicious transactions to FINTRAC **electronically** if you have the technical capabilities to do so. The minimum technical capabilities are as follows:

- A personal computer with the following characteristics:
  - 32 MB memory (64 MB or higher is preferable);
  - 640 x 480 VGA video display (800 x 600 or higher is preferable);
  - an operating system running a Web browser; and
- An Internet connection

See section 4 for more information on submitting reports to FINTRAC electronically.

#### Exception for employees and suspicious transaction reports

If you are an employee of a reporting entity, you are a "reporting entity" yourself, for the purposes of suspicious transactions **only**. This requires you to make a report to FINTRAC about a suspicious transaction unless you reported it to your superior. In this situation, if you need to make a report about a suspicious transaction that you did not report to your superior, you are considered **not** to have the technical capabilities to report electronically. This means you must submit this type of report by paper, as explained below.

This exception does not apply if you are submitting a suspicious transaction report on behalf of your employer or anyone else that is a reporting entity.

### Paper reporting

If you do **not** have the technical capabilities to send reports electronically, you must submit reports on paper. See *Guideline 3B: Submitting Suspicious Transaction Reports to FINTRAC by Paper.* 

## 3.5 Information to be contained in a suspicious transaction report

Your suspicion about there being a relation to a money laundering or a terrorist financing offence may be as a result of more than one transaction. In this case, include all the transactions that contributed to your suspicion in the same report.

By completing all applicable fields in your reports, you make an important contribution to FINTRAC's ability to isolate activity pointing to possible money laundering or terrorist activity financing. In the case of a suspicious transaction report, your detailed explanation of what led to the suspicion is also extremely important to FINTRAC's analysis.

See section 5 and Appendix 1 for more information about what has to be included in a suspicious transaction report.

## 3.6 Suspicious transaction report records

When you have to report a suspicious transaction to FINTRAC, you have to keep a copy of the report. See *Guideline 6: Record Keeping and Client Identification* for more information about obligations related to keeping records.

If you use F2R to submit reports, you will be given the option to print or save the report before you submit it to FINTRAC. If you submit your suspicious transaction reports by batch, your copy of your batch file will contain copies of the reports (see subsection 4.1).

## 4 Electronic Reporting

#### 4.1 Options for electronic reporting

As a reporting entity, you have to report suspicious transactions electronically to FINTRAC if you have the technical capabilities to do so (see subsection 3.4).

There are two options for electronic reporting:

- FINTRAC's secure Web site (F2R); and
- Batch file transfer.

Both options provide for secure encrypted transmission to ensure data confidentiality and integrity. Reporting through batch requires more advanced technical capability than explained in subsection 3.4.

#### 4.2 How to complete electronic reports

#### Reporting through F2R

F2R contains the suspicious transaction reporting screens, with completion instructions. Drop-down menus appear wherever a code or specific selection is required.

See Appendix 1 for the completion instructions, including details of what each field must contain for a suspicious transaction report. Also, Appendix 2 explains how to navigate through the F2R reporting screens.

### Reporting through batch file transfer

To use the batch file reporting mechanism, you need a public key infrastructure (PKI) certificate and specialized software available from FINTRAC. For more information about how to get these, refer to the reporting area of FINTRAC's Web site (<u>http://www.fintrac-canafe.gc.ca</u>).

Consult the Standard Batch Reporting Instructions and Specification for more information about how to report suspicious transactions through batch file transfer. This document is available from the technical documentation area of the Publications page on FINTRAC's Web site (<u>http://www.fintrac-canafe.gc.ca</u>). You can also refer to Appendix 1 of this guideline for instructions regarding the content of fields in a suspicious transaction report.

### 4.3 Acknowledgement of receipt of an electronic report

FINTRAC will send you an acknowledgement message when your suspicious transaction report has been received electronically.

If you send your reports by batch, you will receive two acknowledgements. The first will confirm that your batch has been received by FINTRAC. The second will confirm that it has been processed.

For each report submitted through F2R, you will receive an acknowledgement message including the date and time your report was received and the report's identification number. These acknowledgements will be stored on F2R and available for viewing or printing.

## 4.4 Report corrections

If you need to request a suspicious transaction report for change in F2R, you will do so based on the acknowledgement for that report.

If a correction is required to a report that you sent through F2R, you will have to make that correction through F2R.

If a correction is required to a report that you sent through batch file transfer, you will do this according to your choice of correction options upon enrolment for electronic reporting. For more information about this, refer to the *Standard Batch Reporting Instructions and Specification* and the documents about FINTRAC's electronic reporting enrolment and use of F2R.

## 5 Instructions for Completing a Suspicious Transaction Report

## 5.1 General instructions

Instructions for the fields of the *Suspicious Transaction Report* screens are contained in Appendix 1. Additional instructions in Appendix 2 relate to navigation through the reporting screens on F2R.

The instructions in Appendices 1 and 2 are based on the reporting screens through F2R. However, the information about how to complete the fields can also be useful to those completing suspicious transaction reports through batch file transfer. If you report through batch, you need to refer to the *Standard Batch Reporting Instructions and Specification* in addition to Appendix 1.

As explained in subsection 3.4, if you do not have the capability to report electronically, refer to *Guideline 3B: Submitting Suspicious Transactions to FINTRAC by Paper* for more information.

Fields in reports are either mandatory, mandatory where applicable, or require "reasonable efforts" to complete, as follows:

- Mandatory: All fields of a report marked with an asterisk (\*) have to be completed.
- **Mandatory where applicable:** The fields that have both an asterisk and "where applicable" next to them have to be completed if they are applicable to you or the transaction being reported.
- **Reasonable efforts:** For all other fields that do not have an asterisk, you have to make reasonable efforts to get the information. "Reasonable efforts" means that you tried to get the information requested on the report. If the information is available to you, you must provide it in the report. If the information was not available at the time of the transaction, and it is not contained in your files or records, the field may be left blank.

## 5.2 Accessing the F2R reporting screens

To access F2R, reporting entities first have to be enrolled for electronic reporting with FINTRAC. For more information about this, consult the *F2R Electronic Reporting User Guide*, available from the Publications page of FINTRAC's Web site (<u>http://www.fintrac-canafe.gc.ca</u>).

You can get to F2R from the reporting section of FINTRAC's main Web site (<u>http://www.fintrac-canafe.gc.ca</u>). If you are authorized to complete suspicious transaction reports, you will be able to select this report type in F2R. You will be able to complete a new report or continue working on an incomplete report (that is, a report that was not previously submitted to FINTRAC). For more information about completing a report, see Appendices 1 and 2 of this guideline.

Also, depending on your access rights, you will be able to submit a request for change to a completed report (that is, one that was previously submitted to FINTRAC). Subsection 5.4 contains instructions for submitting a change to a previously submitted report.

### 5.3 Instructions for submitting a new report

There are nine parts on the *Suspicious Transaction Report* form, but some are only to be completed if the part is applicable.

See Appendix 1 for instructions about the fields in each part of the report. If you use F2R, Appendix 2 provides additional instructions regarding navigation through the reporting screens. If you report through batch, you should also refer to the *Standard Batch Reporting Instructions and Specification*.

#### 5.4 Instructions for submitting a change to a previously submitted report

If you have to submit a change to a previously submitted suspicious transaction report, you must provide any required changes to FINTRAC within the reporting deadline for the report. In other words, this information should be sent to FINTRAC within 30 calendar days of your having reasonable grounds to suspect, as explained in subsection 3.2.

If you report through batch, refer to the technical documentation called *Standard Batch Reporting Instructions and Specification* to find out how to submit changes for previously submitted reports by batch. If you choose to do this through F2R instead of by batch, read subsection 5.5. That choice means that you cannot submit changes by batch.

If you report through F2R, read subsection 5.5.

### 5.5 Submitting changes through F2R

If you need to change a suspicious transaction report that you previously submitted to FINTRAC, you will have to request that this report be sent back to you for this purpose. Select "Acknowledgements" from the left side menu to find the report in need of correction. Once you have selected the report you need to change, select the "Request for change" button at the top of the screen. Within a few moments of your request, the screens for that report will be made available to you through the "Requested for change" queue.

#### Change details

Before any change to a report can be submitted to FINTRAC, you have to provide an explanation as to the correction made and provide a reason for the change.

Remember that you must provide any required changes to FINTRAC within the 30-calendar-day reporting deadline for the report.

## 6 Comments?

These guidelines will be reviewed on a periodic basis. If you have any comments or suggestions to help improve them, please send your comments to the mailing address provided below, or by email to <u>guidelines-lignesdirectrices@fintrac-canafe.gc.ca</u>.

## 7 How to Contact FINTRAC

For further information on FINTRAC and its activities, reporting and other obligations, please go to FINTRAC's Web site (<u>http://www.fintrac-canafe.gc.ca</u>) or contact FINTRAC:

Financial Transactions and Reports Analysis Centre of Canada 234 Laurier Avenue West, 24<sup>th</sup> floor Ottawa ON K1P 1H7 Canada

Toll-free: 1-866-346-8722

## Appendix 1: Field-by-Field Instructions for a Suspicious Transaction Report

Fields in reports are either mandatory, mandatory where applicable, or require "reasonable efforts" to complete, as follows:

- Mandatory: All fields of a report marked with an asterisk (\*) have to be completed.
- **Mandatory where applicable:** The fields that have both an asterisk and "where applicable" next to them have to be completed if they are applicable to you or the transaction being reported.
- **Reasonable efforts:** For all other fields that do not have an asterisk, you have to make reasonable efforts to get the information. "Reasonable efforts" means that you tried to get the information requested on the report. If the information is available to you, you must provide it in the report. If the information was not available at the time of the transaction, and it is not contained in your files or records, the field may be left blank.

In certain circumstances, only as directed in the instructions for certain fields, if you need to indicate that a required field in a report is not applicable, leave the field blank. Do **not** enter "N/A" or "n/a" or substitute any other abbreviations, special characters (for example, "x", "-" or "\*") or words (for example, unknown).

To view an outline of your report at any time, select "STR" from the top of the left menu, or from the breadcrumb trail at the top of the screen (for example, "Home > Reporting > STR"). This outline provides an overview of each part of your report based on the information for the transaction that you have entered so far. To go directly to any part within a particular transaction or disposition, select that part's title in the summary and you will go directly to that screen.

#### Part A: Information about where the transaction took place

This part is for information about the reporting entity required to report the transaction to FINTRAC. It is also for information about the physical location where the transaction took place or was attempted.

If you need more information about what type of individual or entity is a reporting entity, see the series of guidelines prepared by FINTRAC to explain reporting and other obligations.

If you have multiple branch or office locations, the information in this part should refer to the branch or office location where the transaction took place or was attempted. Transactions that happened or were attempted at different branch or office locations must be reported on separate reports.

Some reporting entities have contractual arrangements with someone outside their entity to conduct transactions on their behalf. For example, a money services business arranges for transactions, such as electronic funds transfers, to be conducted for them at a grocery store. If you have this type of arrangement, as the reporting entity, your name belongs in Part A. However, since the transaction was conducted at someone else's place of business, it is that address that must appear in Part A.

Also, some reporting entities choose to have someone outside their entity transmit their reports to FINTRAC. In this situation, the transmitter is not the reporting entity, nor did they conduct the transaction. Therefore, information about the transmitter would not appear in Part A, unless the reporting entity chooses to have the transmitter be the contact person about the report (fields A7 to A10).

#### Transaction status indicator

To report a **completed** transaction, select "Completed" as the transaction status indicator. This applies to the entire report, so you should not include any other transactions in this report if they were attempted.

To report an **attempted** transaction, select "Attempted" as the transaction status indicator. This applies to the entire report, so you should not include any other transactions in this report if they were completed.

If you need more information about when a transaction is completed or attempted, see the series of guidelines prepared by FINTRAC to explain reporting and other obligations.

#### Field A1\* Reporting entity identifier number

This field will display the reporting entity's seven-digit identifier number assigned by FINTRAC at F2R enrolment, based on your log on and the reporting entity for which you are reporting. You cannot change the information in this field.

The reporting entity's identifier number will also display at the top right of each screen for this report, along with the full name of the reporting entity.

#### Field A1A\* Reporting entity location number

This field has to contain the location number that represents information about where the transaction took place or was attempted. Location numbers are maintained by the reporting entity. The location address will be displayed based on the location number selected from the drop-down menu.

For deposit taking institutions, this number could be the branch portion of your transit number with leading zeroes. For example, the location number for branch 02831 of bank number 0004 would be 02831.

You can search for a location number by selecting the "Search" button underneath field A1A.

For more information about location numbers, contact your F2R administrator.

#### Fields A3 to A6 Address where the transaction took place

This information should refer to where the transaction took place or was attempted.

The full address will be displayed, based on the information from field A1A. If the information displayed is not correct for the location of this transaction, you will have to correct your entry at field A1A, or request that the information for those fields be corrected by your F2R administrator.

#### Field A6A Reporting entity report reference number

F2R will assign a FINTRAC report number to each report, which appears at the top right of each screen for the report.

If you use a different reference number for your own internal purposes, you can enter it in your report to FINTRAC. This field can contain up to 20 alpha or numeric characters. This number has to be unique for each of your reporting entity's reports.

If you do not wish to use such an internal reference number, leave this field empty.

### Fields A7\*, A8\*, A9, A10\* and A10A Contact name and telephone number

This area is for information about the individual FINTRAC can contact for clarification about this report. Select the contact name from the drop-down menu. If the contact name you need is not displayed, or if any of the contact information displayed in fields A7 to A10 requires correction, get in touch with the individual designated to maintain this information by your F2R administrator.

# Field A11\* Which one of the following types of reporting entities best describes you?

The activity sector based on the profile established for you upon enrolment will be displayed in this field. If you are involved in more than one activity sector and the one shown is not applicable to the transaction being reported, you need to change this field. Select the appropriate activity from the drop-down menu to reflect the transaction being reported. If there is more than one activity for one or more transactions on the report, select only one to indicate your principal type of activity, and provide additional details in Part G.

If you select "Next" to the right underneath field A11, you will go on to Part B1 (Information about how the transaction was initiated). If you select "Previous" to the left, you will get an outline of the report, based on the information entered so far.

#### Part B1: Information about how the transaction was initiated

This part is for information about how the transaction was initiated (that is, where the money came from) for the transaction(s) that led you to the suspicion of a connection to money laundering or terrorist financing. In the case of an attempted transaction, this would include information about how it was proposed to be initiated.

Your suspicion could be based on a series of transactions. In that case, include in this report the information for each transaction that led to the suspicion.

If you have to include more than one transaction in this report, select "Add transaction" at the top left of this part to include as many transactions as you need.

The transaction number for the screen displayed is shown under the Part B1 title. If you select the arrow to the right, you will get the report's outline to help keep track of each transaction. You can move to any other part of the report by selecting it from the outline. Once you have entered the dates and times of each transaction, that information will also be displayed to help you keep track of them.

If you include too many transactions, select "Delete transaction" to remove the ones you do not need. Make sure that the screen displayed is for the transaction you wish to remove before you select "Delete transaction".

#### Fields B1\*, B2 and B3\* When the transaction took place

Enter the date (yyyy-mm-dd) and time (hh:mm:ss) of the suspicious transaction.

For the date, you can either enter the numbers for year, month and day, separated by a dash, or you can pick the date from the calendar provided.

For the time, use a 24-hour format. For example, enter "15:30:00" to represent 3:30 p.m. You can enter the time either by typing in the numbers separated by a colon, or you can choose from the drop-down menu and alter the minutes and seconds as required.

The time of transaction (field B2) can be left blank if it is not available from the moment of the transaction or in your records.

The date of transaction (field B1) is mandatory. However, if the transaction was a night deposit, and you do not provide the date, you can leave field B1 blank. In this case, make sure to indicate that it was a night deposit at field B3.

If the transaction being reported was attempted and, because of this, information for field B1 or B3 is not available, you can leave the field blank.

#### Field B4 Date of posting

Enter the date (yyyy-mm-dd) the transaction cleared, if this differs from the date of the transaction provided above. You can either enter the numbers for year, month and day, separated by a dash, or you can pick the date from the calendar provided. In the case of an attempted transaction, this field would not apply.

#### Field B5\* Detail funds involved in initiating transaction

Select the appropriate type to describe the funds involved in initiating the transaction. For example, if your client brought in cash, "Cash in" is the type of funds, or if your client is cashing in a life insurance policy, "Negotiated life insurance policy" is the description of funds. If the selections provided do not cover the particular transaction, indicate "Other" and provide details (up to 20 characters) in the field provided. For example, if annuities were involved in initiating the transaction, indicate "Other" and provide information about the type of annuity in the "Other" field.

If there was more than one type of funds, indicate only one that best represents how the transaction was initiated. Provide information about the rest of the types of funds in Part G.

If the transaction being reported was attempted and, because of this, information for field B5 is not available, you can leave the field blank.

If you are a dealer in precious metals and stones, select the type of funds in field B5 that best describes what you received in the transaction, or what you were supposed to receive in an attempted transaction. If you were buying precious metals or stones, indicate the type of funds that best describes what you bought or attempted to buy. The same would apply if you were to receive precious metals or stones from a client for a trade-in sale. If you were selling precious metals or stones to a client, indicate the type of funds based on how the client paid or attempted to pay. For example, if the client paid cash, indicate "cash in" or if the client paid by debit card or credit card, indicate "Other" and provide details in the "Other" field.

#### Field B6\* Amount of transaction

Enter the total amount of funds involved in the transaction. This is the total amount received to start the transaction. What happens as a result of that amount will be explained in Part B2 as one or more dispositions.

The amount can be up to 15 characters. It can be entered with spaces or commas for thousand separators. For example, \$9,000 could be entered as "9 000" or "9,000". It can also be entered without any thousand separators (for example, 9000). If you need to, you can indicate a decimal in any of these formats, by including two numeric characters following a period. For example, \$9,999.99 could be entered as "9,999.99" or "9999.99". It could also be entered using a comma to denote the decimal (for example, "9999,99").

If the amount of the transaction was not in Canadian funds, do not convert it, but provide the currency information in field B7.

If the transaction being reported was attempted and, because of this, information for field B6 is not available, you can leave the field blank.

#### Field B7\* Transaction currency

Enter the type of currency for the transaction. Locate the appropriate currency code to use from the drop-down menu. The codes for Canadian dollars (CAD) and United States dollars (USD) are at the top. The complete list of currency codes is available in the technical publications area of the Publications page on FINTRAC's main Web site (http://www.fintrac-canafe.gc.ca).

If the transaction being reported was attempted and, because of this, information for field B7 is not available, you can leave the field blank.

## Fields B8\* and B9\* Other institution, entity or person name, number and account number (if applicable)

These fields are for additional information about the funds described in field B5. Where applicable, in field B8, provide the name (including the institution identification number if applicable) of any other institution, entity or individual involved in the transaction. In addition, where applicable, in field B9, provide the account number of any other individual or entity involved in the disposition. If more than one other individual, entity or institution was involved, put the information about the others in Part G.

Field B8 can contain up to 35 characters and field B9 can contain up to 30 characters.

#### Field B10\* How was the transaction conducted?

Select the appropriate method to indicate how the transaction was conducted or attempted. For example, if the transaction was done through an automated banking machine, select "Automated banking machine". If the selections provided do not cover this particular transaction, indicate "Other" and provide details (up to 20 characters) in the next field. If the transaction being reported was attempted and, because of this, information for field B10 is not available, you can leave the field blank.

## Field B11 ID number of the person initially identifying a suspicious transaction

Enter the identification number of the individual who first identified the suspicious behaviour leading to the report. If that individual does not have an ID number, this field may be left blank.

This field can contain up to 15 alpha or numeric characters.

If you select "Next" underneath field B11, you will go on to Part B2 (Information about the disposition). If you select "Previous", you will go to Part A.

#### Part B2: Information about the disposition

This part is for information about how the transaction was completed (that is, where the money went). In the case of an attempted transaction, this would include information about how it was proposed to be completed.

#### "On behalf of" indicator

At the top of Part B2, you have to indicate whether the individual who conducted or attempted the transaction was doing so on anyone else's behalf. You have to select one of the following for this entry from the drop-down menu:

#### • Not applicable

This means that **neither** Part E (On behalf of entity) **nor** Part F (On behalf of another individual) applies to this report. "Not applicable" indicates that, to your knowledge, none of the other "On behalf of" selections is applicable to the transaction. For example, the transaction was a night deposit or a quick drop, or the disposition was not on anyone else's behalf (that is, it was on behalf of the individual that conducted or attempted it).

#### • On behalf of an entity

This indicates that the disposition was on behalf of an entity, such as a business, a partnership, a corporation, a trust or other entity, but was **not** an employee depositing cash to his or her employer's business account. For a transaction that was conducted or attempted on behalf of an entity, complete Part E for this report to provide the information about that entity.

#### • On behalf of another individual

This indicates that the disposition was on behalf of another individual but was **not** an employee depositing cash to his or her employer's business account. For a transaction that was conducted or attempted on behalf of another individual, complete Part F to provide the information about that other individual.

#### Cash deposit to employer's business account

This indicates that the disposition was an employee depositing cash to his or her employer's **business** account. If it was an employee depositing cash to his or her employer's business account, **neither** Part E **nor** Part F applies for this report. Do not use this indicator if the employee deposited other than cash or if the employer's account was other than a business account.

#### More than one disposition

There could be more than one disposition for a particular transaction. For example, your client could initiate a transaction in cash, send an electronic funds transfer (EFT) for part of it (disposition 1), order a bank draft for another part

(disposition 2) and deposit the rest (disposition 3). In that case, make sure you include the information for each disposition. If you are including more than one transaction in this report, you have to complete Part B2 for all dispositions for each transaction.

If you have to include more than one disposition for this transaction, select "Add disposition" at the top left of this part to include as many dispositions as you need. The transaction number and the disposition number for the screen displayed are shown underneath the Part B2 title. If you select the arrow to the right, you will get the report's outline to help keep track of each transaction. You can move to any other part of the report by selecting it from the outline. Once you have entered the amount of the disposition in each Part B2, that information will be displayed to help you keep track of them.

If you have included too many dispositions, select "Delete disposition" to remove the ones you do not need. Make sure that the screen displayed is for the disposition you wish to remove before you select "Delete disposition".

#### Field B12\* Disposition of funds

This describes what happened to the funds involved in the transaction.

If the disposition of funds was a life insurance policy, indicate this and provide the life insurance policy number (up to 30 characters) in the appropriate field. If the selections provided do not cover this particular disposition, indicate "Other" and provide details (up to 20 characters) in the appropriate field.

If the transaction being reported was an employee depositing cash to an employer's business account (as indicated by the "on behalf of" indicator at the top of Part B2), the disposition of funds in field B12 should be "deposit to an account".

If the transaction being reported was attempted and, because of this, information for field B12 is not available, you can leave the field blank.

If you are a dealer in precious metals and stones, select the disposition of funds in field B12 that best describes what you paid or sold (or what you attempted to pay or sell) to the conductor of the transaction. If you were buying precious metals or stones, select the disposition of funds that best describes how you paid or attempted to pay for them. For example, if you paid in cash, indicate "cash out" or if you paid by cheque, indicate "Other" and provide details in the "Other" field. If you were selling precious metals or stones (including a trade-in sale), select the disposition of funds that best describes what your client purchased or attempted to purchase.

#### Field B13\* Amount of disposition

Enter the amount of funds involved in the disposition. If the amount was not in Canadian funds, do not convert it, but provide the currency code in field B14.

The amount can be up to 15 characters. It can be entered with spaces or commas for thousand separators. For example, \$9,000 could be entered as "9 000" or "9,000". It can also be entered without any thousand separators (for example, 9000). If you need to, you can indicate a decimal in any of these formats, by including two numeric characters following a period. For example, \$9,999.99 could be entered as "9,999.99" or "9999.99". It could also be entered using a comma to denote the decimal (for example, "9999,99").

If the transaction being reported was attempted and, because of this, information for field B13 is not available, you can leave the field blank.

#### Field B14\* Disposition currency

Enter the type of currency for the transaction. Locate the appropriate currency code to use from the drop-down menu. The codes for Canadian dollars (CAD) and United States dollars (USD) are at the top. The complete list of currency codes is available in the technical publications area of the Publications page on FINTRAC's main Web site (http://www.fintrac-canafe.gc.ca).

If the transaction being reported was attempted and, because of this, information for field B14 is not available, you can leave the field blank.

## Fields B15\* and B16\* Other institution, entity or person name, number and account or policy number (if applicable)

These fields are for additional information about the disposition described in field B12. Where applicable, in field B15, provide the name (including the institution identification number if applicable) of any other institution, individual or entity involved in the disposition. In addition, where applicable, in field B16, provide the account number of any other individual or entity involved in the disposition. Also provide any policy number related to the other entity or individual in field B16, if applicable.

If more than one other individual, entity or institution was involved, put the information about the others in Part G.

Field B15 can contain up to 35 characters and field B16 can contain up to 30 characters.

If you select "Next" underneath field B16, you will go on to Part C. If you select "Previous", you will go to Part B1.

#### Part C: Account information (if applicable)

This part is for information about the account involved in the transaction, if it in fact involved an account. If the transaction was not related to an account, select "Next" following field C8 to go on to Part D. In the case of an attempted transaction, this would include information about the account that was proposed to be involved.

As explained earlier, it is possible to have more than one transaction per report and more than one disposition per transaction. Provide the account information, if applicable, for each disposition included in the report. The transaction number and the disposition number for the screen displayed are shown under the Part C title. If you select the arrow to the right, you will get the report's outline to help keep track of each transaction. You can move to any other part of the report by selecting it from the outline. Once you have entered the actual account number in Part C, that information will also be displayed to help you keep track of them.

If the information in Part C is the same as another Part C you completed within this report, you can select "Copy part" and choose which one you want copied. This will repeat the information from that other Part C.

## Field C1\* Branch or transit number where the account is held (if this Part is applicable)

Enter the branch number, transit number, or other appropriate identifying number of the entity where the relevant account is held, if an account is applicable to the transaction. Field C1 can contain up to 12 characters.

If the transaction being reported was attempted and, because of this, information for field C1 is not available, you can leave the field blank.

#### Field C2\* Account number (if this Part is applicable)

Enter the number of the relevant account. Field C2 can contain up to 30 characters.

If the transaction being reported was attempted and, because of this, information for field C2 is not available, you can leave the field blank.

#### Field C3\* Account type (if this Part is applicable)

Indicate the type of the relevant account. For example, a business account would be one that, at the time it was opened, was for a business or for a non-profit organization, etc. (that is, other than a personal or trust account). If the selections "personal, business or trust" do not cover this particular account, indicate "Other" and provide details (up to 20 characters) in the field provided.

If the transaction being reported was an employee depositing cash to an employer's business account (as indicated by the "on behalf of" indicator at the top of Part B2), the account type in field C3 should be "business".

If the transaction being reported was attempted and, because of this, information for field C3 is not available, you can leave the field blank.

#### Field C4\* Account currency (if this Part is applicable)

Enter the type of currency for the relevant account. Locate the appropriate currency code to use from the drop-down menu. The codes for Canadian dollars (CAD) and United States dollars (USD) are at the top. The complete list of currency codes is available in the technical publications area of the Publications page on FINTRAC's main Web site (http://www.fintrac-canafe.gc.ca).

If the transaction being reported was attempted and, because of this, information for field C4 is not available, you can leave the field blank.

## Field C5\* Full name of the individual(s) or entity that hold the account (if this Part is applicable)

Enter the full name of each account holder (up to three). Each field for the account holder name can contain up to 45 characters.

This is for information about each individual or entity that holds the account. For example, in the case of a joint account for husband and wife, include the names of each spouse at field C5.

The account holder might be different from the individual(s) authorized to give instructions for the account. For example, an account for a corporation will have one or more individuals authorized to give instructions for that account. In this case, it is the name of the corporation that holds the account that is required in field C5. Information about individuals authorized to bind the entity or to act with respect to the account belongs in Part E, if applicable, in field E12.

If the transaction being reported was attempted and, because of this, information for field C5 is not available, you can leave the field blank.

#### Field C6 Date opened

Enter the date (yyyy-mm-dd) the account was opened. You can either enter the numbers for year, month and day, separated by a dash, or you can pick the date from the calendar provided.

#### Field C7 Date closed

Enter the date (yyyy-mm-dd) the account was closed, if applicable. You can either enter the numbers for year, month and day, separated by a dash, or you can pick the date from the calendar provided.

## Field C8\* Status of the account at the time the transaction was initiated (if this Part is applicable)

Indicate whether the account was active, inactive or dormant at the time the transaction was initiated.

The status of an account is determined by your policies and procedures. For example, your policy may be to assign inactive status to all accounts if there is no client activity for an account over a certain period of time, and dormant status if that inactivity is prolonged.

If you do not have such policies or procedures to assign inactive or dormant status to unused accounts, simply leave this field blank.

If the transaction being reported was attempted and, because of this, information for field C8 is not available, you can leave the field blank.

If you select "Next" underneath field C8, you will go on to Part D. If you select "Previous", you will go to Part B2.

#### Part D: Information about the individual conducting the transaction

This part is for information about the individual who conducted or attempted to conduct the transaction. As explained earlier, it is possible to have more than one transaction per report. Provide this information for each transaction included in the report.

The transaction number for the screen displayed is shown under the Part D title. If you select the arrow to the right, you will get the report's outline to help keep track of each transaction. You can move to any other part of the report by selecting it from the outline.

If the information in Part D is the same as another Part D you completed within this report (that is, from one transaction to another), you can select "Copy part" and choose which one you want copied. This will repeat the information from that other Part D.

If you are a dealer in precious metals and stones, the individual who conducted or attempted to conduct the transaction is the one from whom you were buying or to whom you were selling precious metals or stones.

#### Fields D1, D2 and D3 Individual's full name

Enter the last name (up to 20 characters), first name (up to 15 characters) and middle initial (if applicable, up to ten characters) of the individual who conducted or attempted to conduct the transaction.

#### Field D4\* Entity client number (if applicable)

Enter the client number you issued to the individual who conducted or attempted to conduct the transaction, if applicable. Field D4 can contain up to 12 characters.

#### Fields D5 to D9 Individual's full address

Provide the full address of the individual who conducted or attempted to conduct the transaction, as follows:

- Enter the street address (up to 30 characters). This should be the individual's physical address, not a post office box or general delivery address.
- Enter the town or city (up to 25 characters).
- Enter the country from the drop-down menu.
- Enter the province or state from the drop-down menu for Canada, the United States or Mexico. For other countries with provinces or states, enter up to 20 characters. If there is no province or state applicable to the address, leave this field blank.
- Enter the postal or zip code (up to nine characters).

#### Field D10 Country of residence

Enter the country of permanent residence (from the drop-down menu) of the individual who conducted or attempted to conduct the transaction.

#### Field D10A Country of citizenship

Enter the country of citizenship (from the drop-down menu) of the individual who conducted or attempted to conduct the transaction.

#### Field D11 Home telephone number

Enter the home telephone number, including the area code, of the individual who conducted or attempted to conduct the transaction.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: "999-999-9999".

If the number is from outside Canada or the United States, use up to 20 characters to provide the country code, city code and local number components. As each of those components can vary in length, use a dash (-) to separate each one. For example, "99-999-9999-9999" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

#### Field D12 Individual's identifier

Select the document used to identify the individual who conducted or attempted to conduct the transaction.

You can refer to an individual's provincial health card, provided there is no provincial or territorial legislation preventing you from using or requesting it.

If the selections provided do not cover the identifier used, indicate "Other" and provide details (up to 20 characters) in the appropriate field.

Although a Social Insurance Number (SIN) card can be used for identification purposes for transactions such as the opening of an account, the SIN (that is, the number) is not to be provided in any report to FINTRAC. If your client used a SIN card and no other identifying document for ID purposes, indicate **SIN card** in the "Other" area of field D12, but do not provide the number in field D13.

#### Field D13 ID Number

Enter the number of the document described in field D12 that was used to identify the individual who conducted or attempted to conduct the transaction. Field D13 can contain up to 20 characters.

As explained above, a SIN should not be provided in a report to FINTRAC. If the identifier document in field D12 (and D12A) is a SIN card, leave field D13 blank.

#### Fields D14 and D15 Place of issue of individual's identifier

Enter the country (from the drop-down menu) and province or state (from the drop-down menu if country is Canada, the United States or Mexico, or, for other countries with provinces or states, enter up to 20 characters) of issue for the document used to identify the individual who conducted or attempted the transaction. If the document was issued nationally and there was no province or state included in the place of issue, leave the province or state field blank.

#### Field D16 Individual's date of birth

Enter the date of birth of the individual who conducted or attempted to conduct the transaction. You can either enter the numbers for year, month and day, separated by a dash, or you can pick the date from the calendar provided at this field. To move back several years in the calendar, select the arrow next to the year.

#### Field D17 Individual's occupation

Enter the occupation of the individual who conducted or attempted to conduct the transaction. Field D17 can contain up to 30 characters.

Be as descriptive as possible regarding occupation. Provide information that clearly describes it, rather than use a general term. For example, in the case of a consultant, the occupation should reflect the area of consulting, such as "IT consultant" or "consulting forester". As another example, in the case of a professional, the occupation should reflect the nature of the work, such as "petroleum engineer" or "family physician".

If the individual is not employed or engaged in any type of business or profession, provide information that best describes their situation, such as "student", "unemployed", "retired", etc.

#### Field D18 Individual's business telephone number

Enter the business telephone number, including the area code, of the individual who conducted or attempted to conduct the transaction. Include the extension if applicable in field D18A.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: "999-999-9999".

If the number is from outside Canada or the United States, use up to 20 characters to provide the country code, city code and local number

components. As each of those components can vary in length, use a dash (-) to separate each one. For example, "99-999-9999-9999" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

#### Field D19 Individual's employer

Enter the name of the entity or individual who is the employer of the individual who conducted or attempted to conduct the transaction. Field D19 can contain up to 35 characters.

#### Fields D20 to D24 Employer's business address

Provide the business address of the employer of the individual who conducted or attempted to conduct the transaction, as follows:

- Enter the street address (up to 30 characters). This should be the employer's physical address, not a post office box or general delivery address.
- Enter the town or city (up to 25 characters).
- Enter the country (from the drop-down menu).
- Enter the province or state (from the drop-down menu for Canada, the United States or Mexico. For other countries with provinces or states, enter up to 20 characters). If there is no province or state applicable to the address, leave this field blank.
- Enter the postal or zip code (up to nine characters).

#### Field D25 Employer's business telephone number

Enter the business telephone number, including the area code, of the employer of the individual who conducted or attempted to conduct the transaction. Include the extension if applicable in field D25A.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: "999-999-9999".

If the number is from outside Canada or the United States, use up to 20 characters to provide the country code, city code and local number components. As each of those components can vary in length, use a dash (-) to separate each one. For example, "99-999-9999-9999" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

If you select "Next" underneath field D25, you will go on to Part E or F, if applicable. Otherwise, you will go to Part G. If you select "Previous", you will go to Part C.

## Part E: Information about the entity on whose behalf the transaction was conducted (if applicable)

This part only applies if the transaction's disposition was conducted or attempted on behalf of a third party that is an entity. Part E will only appear if you indicated "on behalf of an entity" in Part B2.

If an employee deposited cash in his or her employer's business account, Part E does not apply.

The transaction number and the disposition number for the screen displayed are shown under the Part E title. If you select the arrow to the right, you will get the report's outline to help keep track of each transaction. You can move to any other part of the report by selecting it from the outline.

If the information in Part E is the same as another Part E you completed within this report, you can select "Copy part" and choose which one you want copied. This will repeat the information from that other Part E.

#### Field E1 Name of corporation, trust or other entity

Enter the full name of the business, corporation, trust or other entity on whose behalf the transaction was conducted or attempted. Field E1 can contain up to 35 characters.

#### Field E2 Type of business

Describe the type of business, corporation or other entity on whose behalf the transaction was conducted or attempted. Field E2 can contain up to 20 characters.

### Fields E3 to E7 Full address of entity

Provide the full address of the business, corporation, trust or other entity on whose behalf the transaction was conducted or attempted, as follows:

- Enter the civic address (up to 30 characters). This should be the entity's physical address, not a post office box or general delivery.
- Enter the town or city (up to 25 characters).
- Enter the country (from the drop-down menu).
- Enter the province or state from the drop-down menu for Canada, the United States or Mexico. For other countries with provinces or states, enter up to 20 characters). If there is no province or state applicable to the address, leave this field blank.
- Enter the postal code (up to nine characters).

#### Field E8 Business telephone number

Enter the telephone number, including the area code, of the business, corporation or other entity on whose behalf the transaction was conducted or attempted. Include the extension, if applicable, in field E8A.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: "999-999-9999".

If the number is from outside Canada or the United States, use up to 20 characters to provide the country code, city code and local number components. As each of those components can vary in length, use a dash (-) to separate each one. For example, "99-999-9999-9999" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

#### Fields E9 to E11 Incorporation information

If the transaction was conducted or attempted on behalf of an entity that is a corporation, provide the incorporation number (up to 14 characters). Also provide the country (from the drop-down menu) and province or state (from the drop-down menu if country is Canada, the United States or Mexico, or, for other countries with provinces or states, enter up to 20 characters) of the incorporation number's place of issue. If an incorporation number does not exist for the corporation, leave fields E9, E10 and E11 blank. If the incorporation number was issued nationally and there was no province or state included in the place of issue, leave the province or state field blank.

## Field E12 Individual(s) authorized to bind the entity or act with respect to the account (up to three)

Provide the names of up to three individuals who have authority to conduct transactions through the account. Each field for the name of such an individual can contain up to 35 characters.

If you select "Next" underneath field E12, you will go on to Part G. If you select "Previous", you will go to Part D.

## Part F: Information about the individual on whose behalf the transaction was conducted (if applicable)

This part only applies when the transaction's disposition was conducted or attempted on behalf of a third party that is an individual. Part F will only appear if you indicated "on behalf of another individual" in Part B2.

If the individual conducted or attempted the transaction's disposition on his or her own behalf, this part does not apply. In that case, information about that individual is in Part D.

If an employee deposited cash in his or her employer's business account, Part F does not apply. If the transaction's disposition was conducted or attempted on behalf of a business, corporation or other entity, Part E should be completed.

The transaction number and the disposition number for the screen displayed are shown under the Part F title. If you select the arrow to the right, you will get the report's outline to help keep track of each transaction. You can move to any other part of the report by selecting it from the outline.

If the information in Part F is the same as another Part F you completed within this report, you can select "Copy part" and choose which one you want copied. This will repeat the information from that other previous Part F.

#### Fields F1 to F3 Individual's full name

Enter the last name (up to 20 characters), first name (up to 15 characters) and middle initial (if applicable, up to ten characters) of the individual on whose behalf the transaction was conducted or attempted.

#### Fields F4 to F8 Individual's full address

Provide the full address of the individual on whose behalf the transaction was conducted or attempted, as follows:

- Enter the street address (up to 30 characters. This should be the individual's physical address, not a post office box or general delivery address.
- Enter the town or city (up to 25 characters).
- Enter the country (from the drop-down menu).
- Enter the province or state (from the drop-down menu for Canada, the United States or Mexico. For other countries with provinces or states, enter up to 20 characters). If there is no province or state applicable to the address, leave this field blank.
- Enter the postal or zip code (up to nine characters).

#### Field F9 Home telephone number

Enter the home telephone number, including the area code, of the individual on whose behalf the transaction was conducted or attempted.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: "999-999-9999".

If the number is from outside Canada or the United States, use up to 20 characters to provide the country code, city code and local number components. As each of those components can vary in length, use a dash (-) to separate each one. For example, "99-999-9999-9999" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

#### Field F10 Business telephone number

Enter the business telephone number, including the area code, of the individual on whose behalf the transaction was conducted or attempted. Include the extension if applicable in field F10A.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: "999-999-9999".

If the number is from outside Canada or the United States, use up to 20 characters to provide the country code, city code and local number components. As each of those components can vary in length, use a dash (-) to separate each one. For example, "99-999-9999-9999" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

#### Field F11 Individual's date of birth

Enter the date of birth of the individual on whose behalf the transaction was conducted or attempted. You can either enter the numbers for year, month and day, separated by a dash, or you can pick the date from the calendar provided at this field. To move back one or more years in the calendar, select the arrow next to the year.

#### Field F12 Individual's identifier

Select the document used to identify the individual on whose behalf the transaction was conducted or attempted.

If the selections provided do not cover the identifier used, indicate "Other" and provide details (up to 20 characters) in field F12A. In this case, field F12A is required.

You can refer to an individual's provincial health card, provided there is no provincial or territorial legislation preventing you from using or requesting it.

Although a Social Insurance Number (SIN) card can be used for identification purposes for transactions such as the opening of an account, the SIN (that is, the number) is not to be provided in any report to FINTRAC. If you used a SIN card and no other identifying document for the individual, indicate **SIN card** in the "Other" area of field F12, but do not provide the number in field F13.

#### Field F13 ID number

Enter the number of the document described in field F12 that was used to identify the individual on behalf of whom the transaction was conducted or attempted. Field F13 can contain up to 20 characters.

As explained above, a SIN should not be provided in a report to FINTRAC. If the identifier document in field F12 (and F12A) is a SIN card, leave field F13 blank.

#### Field F14 Country of residence

Enter the country of permanent residence (from the drop-down menu) of the individual on whose behalf the transaction was conducted or attempted.

#### Field F14A Country of citizenship

Enter the country of citizenship (from the drop-down menu) of the individual on whose behalf the transaction was conducted or attempted.

#### Fields F15 and F16 Place of issue of individual's identifier

Enter the country (from the drop-down menu) and province or state (from the drop-down menu if country is Canada, the United States or Mexico, or, for other countries with provinces or states, enter up to 20 characters) of issue for the document used to identify the individual on whose behalf the transaction was conducted or attempted. If the document was issued nationally and there was no province or state included in the place of issue, leave the province or state field blank.

#### Field F17 Individual's occupation

Enter the occupation of the individual on whose behalf the transaction was conducted or attempted. Field F17 can contain up to 30 characters.

Be as descriptive as possible regarding occupation. Provide information that clearly describes it, rather than use a general term. For example, in the case of a consultant, the occupation should reflect the area of consulting, such as "IT consultant" or "consulting forester". As another example, in the case of a professional, the occupation should reflect the nature of the work, such as "petroleum engineer" or "family physician". If the individual is not employed or engaged in any type of business or profession, provide information that best describes their situation, such as "student", "unemployed", "retired", etc.

#### Field F18 Individual's employer

Enter the name of the entity or individual who is the employer of the individual on whose behalf the transaction was conducted or attempted. Field F18 can contain up to 35 characters.

#### Fields F19 to F23 Employer's business address

Provide the business address of the employer of the individual on whose behalf the transaction was conducted or attempted, as follows:

- Enter the street address (up to 30 characters). This should be the employer's physical address, not a post office box or general delivery address.
- Enter the town or city (up to 25 characters).
- Enter the country (from the drop-down menu).
- Enter the province or state (from the drop-down menu for Canada, the United States or Mexico. For other countries with provinces or states, enter up to 20 characters). If there is no province or state applicable to the address, leave this field blank.
- Enter the postal or zip code (up to nine characters).

#### Field F24 Employer's business telephone number

Enter the business telephone number, including the area code, of the employer of the individual on whose behalf the transaction was conducted or attempted. Include the extension if applicable in field F24A.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: "999-999-9999".

If the number is from outside Canada or the United States, use up to 20 characters to provide the country code, city code and local number components. As each of those components can vary in length, use a dash (-) to separate each one. For example, "99-999-9999-9999" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

## Field F25 Relationship of the individual named in Part D to the individual named above

Select the appropriate entry to indicate the relationship of the individual conducting or attempting the transaction to the individual on whose behalf the transaction was conducted or attempted.

If the selections provided do not cover the relationship, indicate "Other" and provide details (up to 20 characters) in field F25A. In this case, field F25A is required.

If you select "Next" underneath field F25, you will go on to Part G. If you select "Previous", you will go to Part D.

#### Part G: Description of suspicious activity

This part is to provide details of why you suspected that the transaction or the series of transactions were related to money laundering or terrorist financing.

#### Field G1\* Description of suspicious activity

This section explains what led you to believe there was something suspicious about the transaction. The more information that you provide to explain the basis of your suspicion, the more valuable your report will be. The ideal response would clearly and completely describe all of the factors or unusual circumstances which led you to a suspicion of money laundering or terrorist financing, and would provide as many relevant details as possible to support this determination.

For your convenience you can cut and paste information from wordprocessing software into this part if you wish. Do not include any graphics or underlined, italicized or bold text.

Do not leave information about the description of suspicious activity out of your report by referring to any other files or documents. FINTRAC will not have access to that information unless you provide the details in your report.

If this report is about one or more transactions that were attempted, also describe why each one was not completed.

If you select "Next" underneath field G1, you will go on to Part H. If you select "Previous", you will go to either Part E or F, as applicable for this report, or to Part D.

#### Part H: Description of action taken (if applicable)

This part is for you to describe what action, if any, was taken by you, as a result of the suspicious transaction.

#### Field H1\* Description of action taken (if this Part is applicable)

This part is for you to describe what action, if any, was taken by you, as a result of the suspicious transaction, in addition to reporting to FINTRAC. For example, if you are also making a report to a law enforcement agency, indicate this in Part H.

For your convenience you can cut and paste information from wordprocessing software into this part if you wish. Do not include any graphics or underlined, italicized or bold text.

If you select "Next" underneath field H1, you will go on to review the validation for this report. If you select "Previous", you will go to Part G.

#### Appendix 2: Navigation Through F2R Reporting Screens for a Suspicious Transaction Report

To access the reporting screens for suspicious transaction reports, you have to be logged on to F2R. Select the "Reporting" area from the left side menu, and select one of the following from the expanded report menu:

#### • New report

To create a new report, select the suspicious transaction report" from the list of report types for which you have data-entry rights. A report number will be generated by FINTRAC for this report, and will appear at the top of the screen, above the title for each part. You cannot use templates for this type of report.

#### • Incomplete reports

To continue working on a report (that is, one that has not yet been submitted to FINTRAC), access "Incomplete reports" from the left side menu. This will display all incomplete reports to which you have access and that were created or updated in the last 30 days. If you need to narrow the search, select the appropriate entry date timeframe, report type, or other information to help locate it, such as the FINTRACgenerated report number that was assigned when the report was first created.

Open the report you need to continue working on by selecting the appropriate row in the list of reports, to the right of the check box.

#### Steps to complete an STR

You will start with the screen for Part A and the menu on the left hand side enables you to move around to the other parts. You can complete your report in any order or in the following five steps. If you move from one screen to another, the information entered in the first screen will be saved before you go to the other screen. You can also select "Save" to do this at any time.

- Step 1 Complete the transaction status indicator as well as any missing fields in Part A and verify the information displayed to provide information about where the transaction took place or was attempted. Select "Next" at the bottom of Part A to go on to step 2. You can also do this by selecting "B1 – Transaction" from the left side menu.
- **Step 2** Complete Part B1 to provide details about the transaction. Select "Next" at the bottom of Part B1 to go on to step 3.

Alternatively, you can select "B2 – Disposition" from the left side menu.

If you have to include more than one transaction in this report, read the field-by-field instructions for Part B1. Go through steps 2 to 6, as appropriate, for each transaction.

 Step 3 — Provide details about the transaction's disposition. To do this, complete Part B2. Depending on the transaction, you might also have to complete Part C and Part E or F.

If the disposition was on behalf of someone other than the individual who conducted the transaction, follow the instructions in step 3A. If it was an employee depositing cash to his or her employer's business account, follow the instructions in step 3B. In any other case, follow the instructions in step 3C.

If you need to include more than one disposition for this transaction, read the field-by-field instructions for Part B2. For each disposition, go through step 3 and, if required, step 4.

#### Step 3A

If the disposition was on behalf of someone other than the individual who conducted the transaction (but not an employee depositing cash to his or her employer's business account), select "on behalf of entity" or "on behalf of individual" from the drop-down menu at the top of Part B2 to indicate on whose behalf it was done. You will have to complete Part E or Part F as explained in step 5.

When you select "Next" at the bottom of Part B2 after completing the appropriate fields, you will go on to complete Part C if the disposition was related to an account. You can also get to Part C by selecting "C – Account" from the left side menu.

Once you have completed Part C, select "Next" at the bottom to go on to step 4. If the disposition was **not** related to an account, select "Next" at the bottom of Part C to go to step 4.

#### Step 3B

If the disposition was an employee depositing cash to his or her employer's business account, select "employee depositing cash to employer's business account" from the drop-down menu at the top of Part B2. In this case, neither Part E nor Part F is applicable.

When you select "Next" at the bottom of Part B2 after completing the appropriate fields, you will go on to complete Part C. You can also get to Part C by selecting "C – Account" from the left side menu.

Once you have completed Part C, select "Next" at the bottom to go on to step 4.

#### Step 3C

In any other case, select "Not applicable" from the dropdown menu at the top of Part B2 to indicate that none of the other "On behalf of" selections is applicable to the transaction. This would apply to transactions such as night deposits or quick drops or to situations where an individual conducted or attempted the transaction on his or her own behalf.

When you select "Next" at the bottom of Part B2 after completing the appropriate fields, you will go on to complete Part C if the disposition was related to an account. You can also get to Part C by selecting "C – Account" from the left side menu. Once you have completed Part C, select "Next" at the bottom to go on to step 4.

If the disposition was **not** related to an account, select "Next" at the bottom of Part C to go on to step 4. You can also do this by selecting "D – Conductor" from the left side menu after completing Part B2.

 Step 4 — Complete Part D to provide information about the individual conducting or attempting to conduct the transaction.

At the end of Part D, selecting "Next" will bring you to step 5 or step 6, depending on the information from Part B2.

If the "on behalf of information" in Part B2 was "On behalf of an entity" or "On behalf of another individual", you will go on to step 5 to complete Part E or F. You can also do this by selecting "E – On behalf of entity" or "F – On behalf of individual" from the left side menu.

If the "on behalf of information" in Part B2 was "Employee depositing cash to employer's business account" or "Not

applicable", you will skip step 5 and go to step 6. You can also do this by selecting "G – Suspicion" from the left side menu.

 Step 5 — If the transaction was conducted or attempted on behalf of an entity or another individual (other than an employee depositing cash in his or her employer's business account), complete either Part E or Part F. Complete Part E to provide information about the business, corporation or other entity on whose behalf the transaction was conducted or attempted. Complete Part F to provide information about the individual on whose behalf the transaction was conducted or attempted.

Once you have completed Part E or Part F as required, select "Next". This will bring you to step 6. You can also do this by selecting "G – Suspicion" from the left side menu.

Step 6 — Complete Part G to explain the reason for your suspicion. In the case of a report about attempted transactions, this must include the reason why they were not completed. When you are finished with Part G, select "Next" at the bottom or select "H-Action taken" to get to Part H. Complete Part H to provide information about any action taken, if applicable.

Certain entries or values in your report will cause your screen to refresh while changes are applied to your report. This means that you may have to wait a few seconds after saving any of the following entries:

- change the contact information (from the drop-down menu above field 7 in Part A);
- add (+) or delete (x) a transaction in Part B1;
- add (+) or delete (x) a disposition in Part B2; and
- use the "on behalf of" indicators at the top of Part B2.

#### Outline view

To view an outline summary of your report at any time, select "STR" from the top of the left menu, or from the breadcrumb trail (for example,

Home > Reporting > STR) at the top of the screen. This provides an overview of each part of the report based on the information you have entered so far. To go directly to any part within a particular transaction or disposition, select its title and you will go directly to that screen.

### Validate/Submit

Once you have completed all the required fields in each part, you can select "Validate/Submit" to go through validation for your report. Validation is done as you move from one completed part of the report to another, so you can also select "Validate/Submit" at any time. You can also get to this by selecting "Next" at the bottom of Part H.

Validation has to be reviewed before the report can be submitted to FINTRAC. This helps ensure required fields are completed before you submit your report. If there are any mandatory fields missing, you will get a validation message telling you which ones. If this happens for a field that is **mandatory if applicable**, you can ignore the message when the field does not apply to the transaction. In any other case, missing information for a mandatory field must be provided before the report is submitted to FINTRAC. Refer to field-by-field instructions for each part of the report for more information about fields required.

#### Keep copy of report

You can print or save a copy of your report at any time before submitting it to FINTRAC, by selecting "Keep a copy of the report" in the left side menu. You are required to keep a copy of the suspicious transaction reports you make to FINTRAC. Before the report is finally submitted, there are options to save and print from your browser. Once you have submitted the report to FINTRAC, you can no longer print or save it.

When your report is received, FINTRAC will send an acknowledgment message through F2R. This will include the date and time your report was received and a FINTRAC-generated identification number. This information will be stored in F2R and you will be able to print it if you wish.