

Guideline 8A: Submitting Non-SWIFT Electronic Funds Transfer Reports to FINTRAC Electronically



Guideline 8A: Submitting Non-SWIFT Electronic Funds Transfer Reports to FINTRAC Electronically

December 2016

This replaces the previous version of *Guideline 8A: Submitting Non-SWIFT Electronic Funds Transfer Reports to FINTRAC Electronically* issued in June 2011. The changes made to this version are described below.

 The reference to the Bank of Canada noon rate has been removed from Section 3.5. As of March 1, 2017, the Bank of Canada will post one exchange rate per day, instead of both a noon and closing rate. To convert foreign currency transactions, reporting entities should use the latest rate provided by the Bank of Canada at the time of the transaction.

The changes are also indicated by a sidebar to the right of the modified text in the PDF version.

Table of Contents

1	Ge	neral	5
2	Who Has to Send an Electronic Funds Transfer Report to FINTRAC?		
	2.1 2.2 2.3	Financial entities	6 7
3		ctronic Funds Transfer Reporting Requirements	
	3.1 3.2 3.3 3.4 3.5 3.6 3.7 3.8	Electronic reporting enrolment	7 8 8 10 11
4	Ele	ctronic Reporting	13
	4.1 4.2 4.3 4.4	Options for electronic reporting How to complete electronic reports Acknowledgement of receipt of an electronic report Report corrections	13 14
5	Instructions for Completing a Non-SWIFT Electronic Funds Transfer Report		
	5.1 5.2 5.3 5.4 5.5	General instructions	15 16 16
6	Co	mments?	18
7	Но	w to Contact FINTRAC	18
Αŗ	pend	dix 1: Field-by-Field Instructions for a Non-SWIFT Electronic Funds Transfer Reports	19
		endix 1A: Field-by-Field Instructions for an Outgoing International Non-SWIFT Electronic Funds Transfer Report (EFTO) endix 1B: Field-by-Field Instructions for an Incoming International	20
		Non-SWIFT Electronic Funds Transfer Report (EFTI)	35
Αŗ	pend	dix 2: Navigation Through Non-SWIFT EFT Report Screens	51
Αŗ	pend	lix 3: Scenarios for EFT Reports Involving Another Reporting Entity	53

Appendix 3A: Scenarios for Outgoing EFT Reports Involving Another	
Reporting Entity	54
Appendix 3B: Scenarios for Incoming EFT Reports Involving Another	
Reporting Entity	57

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 electronic funds transfer (EFT) 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 a terrorist property report.
- 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 websites. FINTRAC is not responsible for the accuracy or reliability of the information contained on those external websites. 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.

2 Who Has to Send an Electronic Funds Transfer Report to FINTRAC?

If you are one of the following individuals or entities (called reporting entities), you must report EFTs 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 EFT reporting requirement does not apply to their operations outside Canada.

2.2 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.

2.3 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.

3 Electronic Funds Transfer 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 enrolment, contact us as explained in section 7.

3.2 When do you have to report electronic funds transfers?

If you are a reporting entity as described in section 2, you have to report incoming and outgoing international electronic funds transfers (EFTs) of \$10,000 or more to FINTRAC no later than five working days after the day of the transmission of the instructions (see subsection 3.7). Read subsection 3.3 to find out more about SWIFT EFTs. Subsection 3.4 and the rest of this guideline contain information about any other type of reportable EFT (that is, non-SWIFT).

3.3 SWIFT electronic funds transfers

The incoming and outgoing SWIFT EFT reporting requirement is only applicable to you if you are a financial entity or a money services business. Furthermore, it only applies if you send or receive EFTs by transmission of a **SWIFT MT 103 message**, as a SWIFT member, through the SWIFT network. SWIFT means the Society for Worldwide Interbank Financial Telecommunication. It is a co-operative owned by the international banking community that operates a global data processing system for the transmission of financial messages.

If you are a financial entity or a money services business and you send this type of EFT, read *Guideline 8B: Submitting SWIFT Electronic Funds Transfer Reports to FINTRAC.* Your reporting obligations regarding EFTs also include sending or receiving EFTs by any other means, as explained below.

3.4 All other reportable electronic funds transfers (non-SWIFT)

The rest of this guideline provides information about the reporting requirement for international "non-SWIFT" EFTs. This applies to you if you are a financial entity, a money services business or a casino. An EFT is the transmission of instructions for a transfer of funds through any electronic, magnetic or optical device, telephone instrument or computer. In this context, SWIFT EFT messages are excluded, as explained in subsection 3.3.

You have to send a non-SWIFT EFT report to FINTRAC for the following transactions.

Outgoing EFTs

These are instructions sent electronically for the transfer of \$10,000 or more outside Canada at the request of a client in the following manner:

• in a single transaction; or

- in two or more transfers of less than \$10,000 each (that total \$10,000 or more) in the following 24-hour rule situations:
 - if you are an entity, your employee or senior officer knows the transfers were made within 24 consecutive hours of each other by or on behalf of the same individual or entity; or
 - if you are an individual, you know the transfers were made within 24 consecutive hours of each other by or on behalf of the same individual or entity.

This type of EFT requires that you send an Outgoing International Non-SWIFT EFT Report (EFTO) to FINTRAC.

It can happen that a client requests a transfer of funds and, instead of sending the EFT yourself, you order someone else that is a financial entity, a money services business or a casino in Canada to send it. In this case, you have to make the related EFT report (EFTO) to FINTRAC **unless** you provide them with the client's name and address. In other words, if you give them your client's name and address, you do not have to report the EFT. See Appendix 3 for example scenarios of this type of situation.

If you send an EFT on your own behalf (not on behalf of a client) to an individual or entity in Canada, you do not have to report it, even if the final recipient of the funds is outside Canada.

Incoming EFTs

These are instructions sent electronically for the transfer of \$10,000 or more from outside Canada at the request of a client in the following manner:

- in a single transaction; or
- in two or more transfers of less than \$10,000 each (that total \$10,000 or more) in the following 24-hour rule situations:
 - if you are an entity, your employee or senior officer knows the transfers were made within 24 consecutive hours of each other by or on behalf of the same individual or entity; or
 - if you are an individual, you know the transfers were made within 24 consecutive hours of each other by or on behalf of the same individual or entity.

This type of EFT requires that you send an Incoming International Non-SWIFT EFT Report (EFTI) to FINTRAC.

If you are a financial entity, a money services business or a casino and you received instructions for a transfer of funds from outside Canada, you have to make the related EFT report (EFTI) to FINTRAC, even if you have to forward the same instructions to another financial entity, money service business or casino in Canada. However, if you receive instructions for a transfer of funds from outside Canada from another financial entity, money services business or casino in

Canada, you do not have to make an incoming EFT report, as long as the EFT contained the name and address of the beneficiary. If the EFT did **not** contain the name and address of the beneficiary and the original sender was outside Canada, you also have to make an incoming EFT report. This is true even if you do not get a copy of the instructions received by the other financial entity, money services business or casino.

See Appendix 3 for example scenarios of these types of situation.

Exception to the 24-hour rule for EFTs

The following exception applies if you send or receive a bundled EFT, that is an EFT with more than one beneficiary. The 24-hour-rule will not apply for any of the amounts under \$10,000 included in a bundled EFT if it was sent at the request of a public body, a very large corporation, or the administrator of a federally or provincially regulated pension fund.

In this context, a public body means any of the following or their agent:

- a Canadian provincial or federal department or Crown agency;
- an incorporated Canadian municipal body (including an incorporated city, town, village, metropolitan authority, district, county, etc.); or
- a hospital authority. A hospital authority means an organization that operates a public hospital and that is designated to be a hospital authority for GST/HST purposes. For more information on the designation of hospital authorities, refer to GST/HST Memoranda Series, Chapter 25.2, *Designation of Hospital Authorities* available in the Forms and Publications section of the Canada Revenue Agency's website (http://www.cra-arc.gc.ca).

Also in this context, a very large corporation is one that has minimum net assets of \$75 million on its last audited balance sheet. The corporation's shares have to be traded on a Canadian stock exchange or on a stock exchange outside Canada that is designated by the Minister of Finance. The corporation also has to operate in a country that is a member of the Financial Action Task Force (FATF). For more information about stock exchanges outside Canada that are designated by the Minister of Finance, refer to the July 2, 2008 news release available in the News area of the Department of Finance's website (http://www.fin.gc.ca).

To find out which countries are members of the FATF, refer to its website (http://www.fatf-gafi.org).

3.5 Electronic funds transfers in foreign currency

If you send or receive an EFT in a foreign currency, you will need to check whether it is the equivalent of 10,000 Canadian dollars or more to determine whether or not it is reportable to FINTRAC. **For this purpose only,** use the last

exchange rate provided by the Bank of Canada available at the time of the transaction, instead of the actual exchange rate used to process the transaction. This calculation is only to check whether the \$10,000 threshold is met for the transaction to be reportable as an EFT transaction.

For example, for an EFT that happened at 9:00 am on Tuesday following a holiday Monday, you would use the Bank of Canada rate from the previous working day (in this case, Friday) to determine whether the transaction is reportable. You can find the rate on the Bank of Canada website at http://www.bankofcanada.ca/rates/exchange/.

If there is no Bank of Canada rate published for the currency of the transaction, use the actual exchange rate applied when you processed the transaction to determine whether it is reportable.

Once you have determined that an EFT in a foreign currency is reportable based on the Bank of Canada rate, you will have to send an EFT report to FINTRAC. On the EFT report in Part A, enter the amount of the transaction in the foreign currency. If you converted this amount to or from Canadian dollars when you processed the transaction (other than using the Bank of Canada rate to determine whether or not it was reportable), enter the actual exchange rate you used to process the EFT in Part A of the report.

3.6 Other requirements associated with electronic funds transfers

In addition to the reporting requirements explained in this guideline, consider the following relating to an EFT transaction:

Record keeping and client identification

EFTs have associated record keeping and client identification requirements. These are explained in *Guideline 6: Record Keeping and Client Identification*.

Originator information to include with transfers

If you **send** or **receive** an EFT of any amount, at the request of a client, there are obligations about **originator information** included with the transfer. For more details about this, see *Guideline 6: Record Keeping and Client Identification*.

Large cash transaction report

If an EFT transaction is initiated in cash, in the amount of \$10,000 or more, you will likely have to make a large cash transaction report to FINTRAC in addition to making the EFT report about the transaction as required. For more information about making large cash transaction reports, consult *Guideline 7: Submitting Large Cash Transaction Reports to FINTRAC*.

Suspicious transaction report

If anything about an EFT transaction gives you reasonable grounds to suspect that it could be related to a money laundering or a terrorist activity financing offence, you have to make a suspicious transaction report to FINTRAC about the same transaction. This would be in addition to making the EFT report about the transaction as required.

The suspicious transaction report has many fields that are different from those of an EFT report. For example, there is a field in the suspicious transaction report for you to explain your suspicion about the transaction. There is also a field in that report for you to describe what action, if any, was taken by you, as a result of the suspicious transaction. This would include stating that you have made an EFT report for the same transaction (if that is the case).

For more information about making suspicious transaction reports, consult the following guidelines:

- Guideline 1: Backgrounder
- Guideline 2: Suspicious Transactions
- Guideline 3: Submitting Suspicious Transaction Reports to FINTRAC

Transactions related to terrorist property

If you know that any proposed transaction is related to property owned or controlled by or on behalf of a terrorist or a terrorist group, you should not complete the transaction. This is because terrorist property must be frozen under the *Regulations Implementing the United Nations Resolutions on the Suppression of Terrorism as* well as the *Criminal Code*.

For more information about this and to find out what your obligations are regarding any terrorist property in your control or possession, consult the following guidelines:

- Guideline 1: Backgrounder
- Guideline 5: Submitting Terrorist Property Reports to FINTRAC

Casino disbursement report

If you are a casino sending an EFT that is part of a casino disbursement in the amount of \$10,000 or more, you will likely have to make a casino disbursement report to FINTRAC in addition to making the EFT report about the transaction as required. For more information about making casino disbursement reports, consult *Guideline 10: Submitting Casino Disbursement Reports to FINTRAC*.

3.7 Reporting timeframes for electronic funds transfer reports

You have to send EFT reports to FINTRAC no later than five working days after the day of the transfer. The day of the transfer means:

• in the case of an incoming EFT, the day the instructions were transmitted to you; and

• in the case of an outgoing EFT, the day you transmit the instructions regarding the transfer of funds.

3.8 Means of reporting electronic funds transfers to FINTRAC

Electronic reporting

As a reporting entity, you will have to submit all EFT reports 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.

Paper reporting

If you do **not** have the technical capabilities to send reports electronically, you must submit reports on paper. See *Guideline 8C: Submitting Non-SWIFT Electronic Funds Transfer Reports to FINTRAC by Paper* for more information on submitting paper non-SWIFT EFT reports to FINTRAC.

4 Electronic Reporting

4.1 Options for electronic reporting

As a reporting entity, you have to send electronic funds transfer reports electronically to FINTRAC if you have the technical capabilities to do so (see subsection 3.8).

There are two options for electronic reporting:

- FINTRAC's secure website (F2R); or
- Batch file transfer.

Both options provide for secure encrypted transmission to ensure data confidentiality and integrity. Reporting through batch will require more advanced technical capability than explained in subsection 3.8.

4.2 How to complete electronic reports

Reporting through F2R

F2R contains the reporting screens for electronic funds transfer reports, with completion instructions. Drop-down menus appear wherever a code or specific selection is required.

See Appendices 1A and 1B for the completion instructions, including details of what each field must contain for a non-SWIFT EFT report. Appendix 1A is about an outgoing non-SWIFT EFT report (EFTO) and Appendix 1B is about an incoming non-SWIFT EFT report (EFTI). 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, refer to the Batch reporting page.

Consult the <u>Standard Batch Reporting Instructions and Specification</u> for more information about how to report non-SWIFT EFTs through batch file transfer. You can also refer to Appendices 1A and 1B for instructions and details regarding the content of fields in a non-SWIFT EFT report.

4.3 Acknowledgement of receipt of an electronic report

FINTRAC will send you an acknowledgement message when your EFT 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 an EFT report for change in F2R, you will do so based on the acknowledgement for that report.

In addition, if your EFT report contains incomplete or inaccurate information, FINTRAC may notify you. The notification will indicate the date and time your report was received, a FINTRAC-generated identification number for the report, along with information on the fields that must be completed or corrected.

After receiving FINTRAC's notification, you should provide the necessary information to FINTRAC within the five—working—day reporting deadline. In other words, this information should be sent to FINTRAC within five working days of the transfer (see subsection 3.7). Your obligation to report will not be fulfilled until you send the **complete** report to FINTRAC.

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 more information about this, refer to the *Standard Batch Reporting Instructions and Specification* and the documents about FINTRAC's enrolment and use of F2R.

5 Instructions for Completing a Non-SWIFT Electronic Funds Transfer Report

5.1 General instructions

The contents of a non-SWIFT EFT depend on whether it is an outgoing or incoming transfer. The required information for each type of report, along with field-by-field instructions, are listed in Appendices 1A and B, as follows:

- Outgoing International non-SWIFT EFT Report (EFTO) (see Appendix 1A)
- Incoming International non-SWIFT EFT Report (EFTI) (see Appendix 1B)

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 non-SWIFT EFT 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 3.8, if you do not have the technical capability to report electronically, refer to *Guideline 8C: Submitting Non-SWIFT Electronic Funds Transfer Reports 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.

The outgoing and incoming non-SWIFT EFT reports have the same mandatory, mandatory where applicable and reasonable efforts fields.

As explained in subsection 3.4, EFT reports can be about one of multiple EFTs of less than \$10,000 each conducted within 24 consecutive hours of each other that add up to \$10,000 or more. Because those individual EFTs were each under \$10,000, the information for some mandatory fields in the report may not be available in your records or from the time of the transaction. In this case, "reasonable efforts" applies to those otherwise mandatory fields.

You have to complete a separate EFT report for each EFT transaction, even if you are reporting multiple EFTs of less than \$10,000 each.

5.2 Accessing the F2R reporting screens

To <u>access F2R</u>, reporting entities first have to be enrolled for electronic reporting with FINTRAC. For more information about this, consult the <u>F2R Electronic</u> Reporting User Guide.

If you are authorized to complete non-SWIFT EFTO or EFTI reports, you will be able to select these report types 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 eight parts to the non-SWIFT EFT report, but some are only to be completed if the part is applicable.

See Appendix 1A or 1B 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 non-SWIFT EFT 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 five working days of the transfer.

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

The following explains how to make a change to a previously submitted non-SWIFT EFT report through F2R:

Report returned for further action (RRFA)

If a non-SWIFT EFT report is returned to you by FINTRAC for correction, you can access it through the queue for reports returned for further action. Select "Reports returned for action" from the left side menu in the "Reporting" area. The entire report will be available.

If nothing is displayed, there are no reports awaiting further action in this queue, or none have been assigned to you.

Change a report

If you need to change a non-SWIFT EFT 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 change made. If it was not requested by FINTRAC, you also have to provide a reason for the change.

Remember that 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 five working days of the transfer.

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 guidelines-lignesdirectrices@fintrac-canafe.gc.ca.

7 How to Contact FINTRAC

For further information on FINTRAC and its activities, reporting and other obligations, please go to FINTRAC's website at http://www.fintrac-canafe.gc.ca or contact FINTRAC:

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

Toll-free: 1-866-346-8722

Appendix 1 — Field-by-Field Instructions for a Non-SWIFT Electronic Funds Transfer Reports

Appendix 1A:

Field-by-Field Instructions for an Outgoing International Non-SWIFT Electronic Funds Transfer Report (EFTO)

Appendix 1B:

Field-by-Field Instructions for an Incoming International Non-SWIFT Electronic Funds Transfer Report (EFTI)

Appendix 1A: Field-by-Field Instructions for an Outgoing International Non-SWIFT Electronic Funds Transfer Report (EFTO)

General Information

This provides general information about the report you are sending to facilitate its processing.

Field 1 Reporting entity full name

The full name of your business or corporation will be displayed based on your log in.

Field 1A 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 2, 3, 4, 5 and 6 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 2 to 6 requires correction, get in touch with the individual designated to maintain this information by your F2R administrator.

If you select "Next" to the right underneath the contact information, you will go on to Part A (Information about the transaction) of the EFT report. You can also do this by selecting "A – Transaction" from the left side menu. If you want to move on to any other part of the report, select that part from the left side menu. If you select "Previous" to the left, you will get an outline of the report.

Fields in the report 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 "EFTO" from the top of the left menu, or from the breadcrumb trail at the top of the screen (for example, "Home > Reporting > EFTO"). This "outline" provides an overview of each part of your report. To go directly to any part within a particular transaction, select that part's title in the summary and you will go directly to that screen.

Part A: Information about the transaction

This part is for information about when the EFT was sent. You have to complete a separate report for each EFT transaction.

24-hour-rule indicator

If the transaction being reported is of \$10,000 or more, answer "no" in the 24-hour-rule indicator field.

If the transaction being reported is one of two or more EFT transactions of less than \$10,000 each made within 24 consecutive hours of each other that total \$10,000 or more, answer "yes" in the 24 hour rule indicator field. Include each such transaction in a separate EFT report and remember to use the 24-hour-rule indicator in Part A for each one.

Field A1 Time of transaction

In the case of an outgoing EFT, enter the time (hh:mm:ss) that you sent the EFT. 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.

Field A2* Date of transaction

In the case of an outgoing EFT, enter the date (yyyy-mm-dd) that you sent the EFT. 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.

Field A3* Amount of transaction

Enter the total amount of funds transferred (or to be transferred).

The amount can be up to 15 characters. It can be entered with spaces or commas for thousand separators. For example, \$10,000 could be entered as "10 000" or "10,000". It can also be entered without any thousand separators (for example, 10000). If you need to, you can indicate a decimal in any of these formats, by including two numeric characters following a period. For example, \$12,240.99 could be entered as "12,240.99" or "12240.99". It could also be entered using a comma to denote the decimal (for example, "12240,99").

If this amount was not in Canadian funds, do not convert it, but provide the currency information in field A4. You also have to provide the actual exchange rate applied at the time of the transaction in field A5.

Field A4* 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 Appendix 1 of *Guideline 3B:* Submitting Suspicious Transaction Reports to FINTRAC by Paper.

Field A5 Exchange rate

Complete this field only if the currency code in field A4 is other than CAD. Use up to 12 characters, including one to indicate the decimal point, where appropriate. Use as many places after the decimal as necessary to enter the exact exchange rate used (for example, 1.5537 or 0.002185).

For an outgoing EFT, enter the actual exchange rate you used when you sent the transfer to convert the amount sent **from** Canadian dollars to the amount and currency shown in fields A3 and A4 above. If there was no exchange rate applied to this transaction to convert the amount sent to Canadian dollars (for example, the EFT was received in Canadian currency), leave this field blank.

If you select "Next" to the right underneath field A5, you will go on to Part B (Information about the client ordering the EFT). You can also do this by selecting "B – Ordering client" from the left side menu. If you want to move on to any other part of the report, select that part from the left side menu. If you select "Previous" to the left, you will get an outline of the report.

Part B: Information about the client ordering the EFT

In the case of an outgoing EFT, this part is for information about the individual or entity ordering you to send the EFT. If the individual or entity that ordered the EFT did so on someone else's behalf, you also have to complete Part D.

Fields B1*or B2*, B3* and B4 Full name of client ordering the EFT Enter the full name of the client that ordered the EFT.

If the client is an entity, enter the complete name of the entity in field B1. This field can contain up to 45 characters.

If it is an individual, enter the individual's surname (up to 20 characters), given name (up to 15 characters), and other name or initial (up to ten characters, if known) in fields B2, B3 and B4.

If the transaction is reportable as one of multiple EFT transactions of less than \$10,000 each and, because of this, information for field B1 or fields B2 and B3 was not obtained at the time of the transaction (and is not available from your records), you can leave these fields blank.

Fields B5, B6, B7, B8 and B9 Full address of the client ordering the EFT Provide the full address of the individual or entity that ordered the EFT, as follows:

- Enter the street address (up to 30 characters). This should be the individual's or entity'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).

If the address does not follow this format, enter the information in each of fields B5 to B9 based on your understanding of the address information, and according to the number of characters available in each field.

Field B10 Client's telephone number

Enter the telephone number, including the area code, of the individual or entity that ordered the EFT.

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" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

Field B11 Individual's birth date

If the client that ordered the EFT was an individual, enter the date of birth of that individual. 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. If the client was an entity, leave this field blank.

Field B12 Individual's occupation

If the client that ordered the EFT was an individual, enter the occupation of that individual. Field B12 can contain up to 30 characters. If the client was an entity, leave this field blank.

Field B13* Client's account number (if applicable)

Enter the account number (if any) that you have for the client ordering the EFT. Field B13 can contain up to 30 characters.

Field B14 Individual's identifier

If the client that ordered the EFT was an individual, select the document used to identify that individual.

In the case of an outgoing EFT, you can refer to the 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, 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 B14, but do not provide the number in field B15.

If the client was an entity, leave this field blank.

Field B15 ID number

Enter the number of the document described in field B14 that was used to identify the client ordering the EFT. Field B15 can contain up to 20 characters.

Remember that a health card number is not acceptable for this purpose in some provinces. Furthermore, as explained at field B14, a SIN should not be provided on this form. If the identifier document in field B14 (and B14A) is a SIN card, leave field B15 blank.

If you select "Next" underneath field B15, you will go on to Part C (Information about the individual or entity sending the payment instructions for the EFT). You can also do this by selecting "C – Sender" from the left side menu. If you want to move on to any other part of the report, select that part from the left side menu. If you select "Previous", you will go to Part A.

Part C: Information about the individual or entity sending the payment instructions for the EFT

In the case of an outgoing EFT, this part is for information about you as the reporting entity sending the payment instructions.

Fields C1* or C2*, C3* and C4 Full name of individual or entity sending the payment instructions

In the case of an outgoing EFT, this information should be about the reporting entity sending the payment instructions. This will therefore be displayed based on your information at log on and the reporting entity for which you are reporting.

Field C5* Reporting entity location number

This field has to contain the location number that represents information about the full address of the individual or entity sending the payment instructions. 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 C5.

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

The full address of the individual or entity sending the payment will therefore be displayed underneath field C5, based on your information at log in and the information in field C5.

If you select "Next" underneath the address information, you will go on to Part D (Information about the third party if the client ordering the EFT is acting on behalf of a third party). You can also do this by selecting "D – Ordering client's third party" from the left side menu. If you want to move on to any other part of the report, select that part from the left side menu. If you select "Previous", you will go to Part B.

Part D: Information about the third party if the client ordering the EFT is acting on behalf of a third party (if applicable)

This part is for information about any third party on whose behalf the EFT was ordered.

If there was no third party related to the EFT order, do not complete this part. In this case, read the information about "Next" following the information about field D12.

Fields D1 or D2, D3 and D4 Full name of the third party on whose behalf the EFT was ordered

Enter the full name of any third party on whose behalf the EFT was ordered.

If the third party is an entity, enter the complete name of the entity in field D1. This field can contain up to 45 characters.

If it is an individual, enter the individual's surname (up to 20 characters), given name (up to 15 characters), and other name or initial (up to ten characters, if known) in fields D2, D3 and D4.

Fields D5, D6, D7, D8 and D9 Full address of the third party on whose behalf the EFT was ordered

Provide the full address of any third party on whose behalf the EFT was ordered, as follows:

- Enter the street address (up to 30 characters). This should be the third party'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 or zip code (up to nine characters).

If the address does not follow this format, enter the information in each of fields D5 to D9 based on your understanding of the address information, and according to the number of characters available in each field.

Field D10 Individual's birth date

If the EFT was ordered on behalf of a third party that is an individual, enter the date of birth of that individual. 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. If the third party was an entity, leave this field blank.

Field D11 Individual's occupation

If the EFT was ordered on behalf of a third party that is an individual, enter the occupation of that individual. Field D11 can contain up to 30 characters. If the third party was an entity, leave this field blank.

Field D12 Individual's identifier

If the EFT was ordered on behalf of a third party that is an individual, select the document used to identify that individual.

In the case of an outgoing EFT, 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 in the appropriate field.

If the third party was an entity, leave this field blank.

If you select "Next" underneath field D12, you will go on to Part E (Information about the individual or entity receiving the payment instructions for the EFT). You can also do this by selecting "E – Receiver" from the left side menu. If you want to move on to any other part of the report, select that part from the left side menu. If you select "Previous", you will go to Part C.

Part E: Information about the individual or entity receiving the payment instructions for the EFT

In the case of an outgoing EFT, this part is for information about the individual or entity to which you are sending the payment instructions.

Fields E1*or E2*, E3* and E4 Full name of individual or entity receiving the payment instructions

In the case of an outgoing EFT, enter the full name of the individual or entity that will receive the payment instructions.

If an entity is receiving the payment instructions, enter the complete name of the entity in field E1. This field can contain up to 45 characters.

If it is an individual, enter the individual's surname (up to 20 characters), given name (up to 15 characters), and other name or initial (up to ten characters, if known) in fields 2, 3 and 4.

If the transaction is reportable as one of multiple EFT transactions of less than \$10,000 each and, because of this, information for field E1 or fields E2 and E3 was not obtained at the time of the transaction (and is not available from your records), you can leave these fields blank.

Fields E5*, E6*, E7*, E8* and E9* Full address of the individual or entity receiving the payment instructions

Provide the full address of the individual or entity that received (or will receive) the payment instructions, as follows:

- Enter the street address (up to 30 characters). This should be the individual's or 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 or zip code (up to nine characters).

If the address does not follow this format, enter the information in each of fields E5 to E9 based on your understanding of the address information, and according to the number of characters available in each field.

If the transaction is reportable as one of multiple EFT transactions of less than \$10,000 each and, because of this, information for fields E5 to E9 was not obtained at the time of the transaction (and is not available from your records), you can leave these fields blank.

If you select "Next" underneath field E9, you will go on to Part F (Information about the client to whose benefit payment is made). You can also do this by selecting "F – Beneficiary" from the left side menu. If you want to move on to any other part of the report, select that part from the left side menu. If you select "Previous", you will go to Part D.

Part F: Information about the client to whose benefit payment is made This part is for information about the individual or entity to whose benefit the payment of the EFT was made (or will be made).

Fields F1*or F2*, F3* and F4 Full name of client to whose benefit payment is made

Enter the full name of the client to whose benefit payment is made.

If the client is an entity, enter the complete name of the entity in field F1. This field can contain up to 45 characters.

If it is an individual, enter the individual's surname (up to 20 characters), given name (up to 15 characters), and other name or initial (up to ten characters, if known) in fields F2, F3 and F4.

If the transaction is reportable as one of multiple EFT transactions of less than \$10,000 each and, because of this, information for field F1 or fields F2 and F3 was not obtained at the time of the transaction (and is not available from your records), you can leave these fields blank.

Fields F5, F6, F7, F8 and F9 Full address of the client to whose benefit payment is made

Provide the full address of the individual or entity to whose benefit payment is made, as follows:

- Enter the street address (up to 30 characters). This should be the individual's or 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 or zip code (up to nine characters).

If the address does not follow this format, enter the information in each of fields F5 to F9 based on your understanding of the address information, and according to the number of characters available in each field.

Field F10 Client's telephone number

Enter the telephone number, including the area code, of the individual or entity to whose benefit payment is made.

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: "999-99999".

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" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

Field F11 Individual's birth date

If the client to whose benefit payment is made is an individual, enter the date of birth of that individual. 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. If the client is an entity, leave this field blank.

Field F12 Individual's occupation

If the client to whose benefit payment is made is an individual, enter the occupation of that individual. Field F12 can contain up to 30 characters. If the client is an entity, leave this field blank.

Field F13* Client's account number (if applicable)

Enter the account number (if any) that you have for the client to whose benefit payment will be made. Field F13 can contain up to 30 characters.

Field F14 Individual's identifier

If the client to whose benefit payment is made is an individual, select the document used to identify that individual. If the selections provided do not cover the identifier used, indicate "Other" and provide details (up to 20 characters) in the appropriate field.

If the client is an entity, leave this field blank.

If you select "Next" underneath field F14, you will go on to Part G (Information about the third party if the client to whose benefit the payment is made is acting on behalf of a third party). You can also do this by selecting "G – Beneficiary's third party" from the left side menu. If you want to move on to any other part of the report, select that part from the left side menu. If you select "Previous", you will go to Part E.

Part G: Information about the third party if the client to whose benefit the payment is made is acting on behalf of a third party (if applicable)

This part is for information about any third party on whose behalf the EFT payment is made.

If there is no third party related to the EFT payment, do not complete this part. In this case, read the information about "Next" following the information about field G12.

Fields G1 or G2, G3 and G4 Full name of the third party on whose behalf the EFT was paid

Enter the full name of any third party on whose behalf the EFT was paid (or is to be paid).

If the third party is an entity, enter the complete name of the entity in field G1. This field can contain up to 45 characters.

If it is an individual, enter the individual's surname (up to 20 characters), given name (up to 15 characters), and other name or initial (up to ten characters, if known) in fields G2, G3 and G4.

Fields G5, G6, G7, G8 and G9 Full address of the third party on whose behalf the EFT was paid

Provide the full address of any third party on whose behalf the EFT was paid (or is to be paid), as follows:

- Enter the street address (up to 30 characters). This should be the third party'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 or zip code (up to nine characters).

If the address does not follow this format, enter the information in each of fields G5 to G9 based on your understanding of the address information, and according to the number of characters available in each field.

Field G10 Individual's date of birth

If the EFT was paid (or is to be paid) on behalf of a third party that is an individual, enter the date of birth of that individual. 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. If the third party is an entity, leave this field blank.

Field G11 Individual's occupation

If the EFT was paid (or is to be paid) on behalf of a third party that is an individual, enter the occupation of that individual. Field G11 can contain up to 30 characters. If the third party is an entity, leave this field blank.

Field G12 Individual's identifier

If the EFT was paid (or is to be paid) on behalf of a third party that is an individual, select the document used to identify that individual. If the selections provided do not cover the identifier used, indicate "Other" and provide details (up to 20 characters) in the appropriate field.

If the third party was an entity, leave this field blank.

If you select "Next" underneath field G12, you will go on to review the validation for this report. If you select "Previous", you will go to Part F.

Appendix 1B: Field-by-Field Instructions for an Incoming International Non-SWIFT Electronic Funds Transfer Report (EFTI)

General Information

This provides general information about the report you are sending to facilitate its processing.

Field 1 Reporting entity's full name

The full name of your business or corporation will be displayed based on your log in.

Field 1A 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 2, 3, 4, 5 and 6 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 2 to 6 requires correction, get in touch with the individual designated to maintain this information by your F2R administrator.

If you select "Next" to the right underneath the contact information, you will go on to Part A (Information about the transaction) of the EFT report. You can also do this by selecting "A – Transaction" from the left side menu. If you want to move on to any other part of the report, select that part from the left side menu. If you select "Previous" to the left, you will get an outline of the report.

The rest of the fields in the report 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 "EFTI" from the top of the left menu, or from the breadcrumb trail at the top of the screen (for example, Home > Reporting > EFTI). This "outline" provides an overview of each part of your report. To go directly to any part within a particular transaction, select that part's title in the summary and you will go directly to that screen.

Part A: Information about the transaction

This part is for information about when the EFT was sent. You have to complete a separate report for each EFT transaction.

24-hour-rule indicator

If the transaction being reported is of \$10,000 or more, answer "no" in the 24-hour-rule indicator field.

If the transaction being reported is one of two or more EFT transactions of less than \$10,000 each made within 24 consecutive hours of each other that total \$10,000 or more, answer "yes" in the 24 hour rule indicator field. Include each such transaction in a separate EFT report and remember to use the 24-hour-rule indicator in Part A for each one.

Field A1 Time of transaction

In the case of an incoming EFT, enter the time (hh:mm:ss) that it was sent to you. 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.

Field A2* Date of transaction

In the case of an incoming EFT, enter the date (yyyy-mm-dd) that it was sent to you. 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.

Field A3* Amount of transaction

Enter the total amount of funds transferred (or to be transferred).

The amount can be up to 15 characters. It can be entered with spaces or commas for thousand separators. For example, \$10,000 could be entered as "10 000" or "10,000". It can also be entered without any thousand separators (for example, 10000). If you need to, you can indicate a decimal in any of these formats, by including two numeric characters following a period. For example, \$12,240.99 could be entered as "12,240.99" or "12240.99". It could also be entered using a comma to denote the decimal (for example, "12240,99").

If this amount was not in Canadian funds, do not convert it, but provide the currency information in field A4. You also have to provide the actual exchange rate applied at the time of the transaction in field A5.

Field A4* 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 Appendix 1 of *Guideline 3B:* Submitting Suspicious Transaction Reports to FINTRAC by Paper.

Field A5 Exchange rate

Complete this field only if the currency code in field A4 is other than CAD. Use up to 12 characters, including one to indicate the decimal point, where appropriate. Use as many places after the decimal as necessary to enter the exact exchange rate used (for example, 1.5537 or 0.002185).

For an incoming EFT, enter the actual exchange rate you used when you received the transfer to convert the amount and currency shown in fields A3 and A4 **to** Canadian dollars. If there was no exchange rate applied to this transaction to convert the amount sent to Canadian dollars (for example, the EFT was sent in Canadian currency), leave this field blank.

If you select "Next" to the right underneath field A5, you will go on to Part B (Information about the client ordering the EFT). You can also do this by selecting "B – Ordering client" from the left side menu. If you want to move on to any other part of the report, select that part from the left side

menu. If you select "Previous" to the left, you will get an outline of the report.

Part B: Information about the client ordering the EFT

In the case of an incoming EFT, this part is for information about the individual or entity that ordered the EFT to be sent to you. If the individual or entity that ordered the EFT did so on someone else's behalf, you also have to complete Part D.

Fields B1*or B2*, B3* and B4 Full name of client ordering the EFT

Enter the full name of the client that ordered the EFT.

If the client is an entity, enter the complete name of the entity in field B1. This field can contain up to 45 characters.

If it is an individual, enter the individual's surname (up to 20 characters), given name (up to 15 characters), and other name or initial (up to ten characters, if known) in fields B2, B3 and B4.

If the transaction is reportable as one of multiple EFT transactions of less than \$10,000 each and, because of this, information for field B1 or fields B2 and B3 was not obtained at the time of the transaction (and is not available from your records), you can leave these fields blank.

Fields B5, B6, B7, B8 and B9 Full address of the client ordering the EFT

Provide the full address of the individual or entity that ordered the EFT, as follows:

- Enter the street address (up to 30 characters). This should be the individual's or entity'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).

If the address does not follow this format, enter the information in each of fields B5 to B9 based on your understanding of the address information, and according to the number of characters available in each field.

Field B10 Client's telephone number

Enter the telephone number, including the area code, of the individual or entity that ordered the EFT.

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: "999-99999".

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" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

Field B11 Individual's birth date

If the client that ordered the EFT was an individual, enter the date of birth of that individual. 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. If the client was an entity, leave this field blank.

Field B12 Individual's occupation

If the client that ordered the EFT was an individual, enter the occupation of that individual. Field B12 can contain up to 30 characters. If the client was an entity, leave this field blank.

Field B13* Client's account number (if applicable)

Enter the account number (if any) that you have for the client ordering the EFT. Field B13 can contain up to 30 characters.

Field B14 Individual's identifier

If the client that ordered the EFT was an individual, select the document used to identify that individual. 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 in Canada, 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 B14, but do not provide the number in field B15.

If the client was an entity, leave this field blank.

Field B15 ID number

Enter the number of the document described in field B14 that was used to identify the client ordering the EFT. Field B15 can contain up to 20 characters.

Remember that a health card number is not acceptable for this purpose in some provinces. Furthermore, as explained at field B14, a SIN should not

be provided on this form. If the identifier document in field B14 (and B14A) is a SIN card, leave field B15 blank.

If you select "Next" underneath field B15, you will go on to Part C (Information about the individual or entity sending the payment instructions for the EFT). You can also do this by selecting "C – Sender" from the left side menu. If you want to move on to any other part of the report, select that part from the left side menu. If you select "Previous", you will go to Part A.

Part C: Information about the individual or entity sending the payment instructions for the EFT

In the case of an incoming EFT, this part is for information about the individual or entity that sent you the payment instructions.

Fields C1*or C2*, C3* and C4 Full name of individual or entity sending the payment instructions

In the case of an incoming EFT, enter the full name of the individual or entity that sent you the payment instructions.

If it is an entity, enter the complete name of the entity in field C1. This field can contain up to 45 characters.

If it is an individual, enter the individual's surname (up to 20 characters), given name (up to 15 characters), and other name or initial (up to ten characters, if known) in fields C2, C3 and C4.

If the transaction is reportable as one of multiple EFT transactions of less than \$10,000 each and, because of this, information for field C1 or fields C2 and C3 was not obtained at the time of the transaction (and is not available from your records), you can leave these fields blank.

Fields C5*, C6*, C7*, C8* and C9* Full address of the individual or entity sending the payment instructions

Provide the full address of the individual or entity sending the payment instructions, as follows:

- Enter the street address (up to 30 characters). This should be the individual's or entity'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).

If the address does not follow this format, enter the information in each of fields C5 to C9 based on your understanding of the address information, and according to the number of characters available in each field.

If the transaction is reportable as one of multiple EFT transactions of less than \$10,000 each and, because of this, information for fields C5 to C9 was not obtained at the time of the transaction (and is not available from your records), you can leave these fields blank.

If you select "Next" underneath field C9, you will go on to Part D (Information about the third party if the client ordering the EFT is acting on behalf of a third party). You can also do this by selecting "D – Ordering client's third party" from the left side menu. If you want to move on to any other part of the report, select that part from the left side menu. If you select "Previous", you will go to Part B.

Part D: Information about the third party if the client ordering the EFT is acting on behalf of a third party (if applicable)

This part is for information about any third party on whose behalf the EFT was ordered.

If there was no third party related to the EFT order, do not complete this part. In this case, read the information about "Next" following the information about field D12.

Fields D1 or D2, D3 and D4 Full name of the third party on whose behalf the EFT was ordered

Enter the full name of any third party on whose behalf the EFT was ordered.

If the third party is an entity, enter the complete name of the entity in field D1. This field can contain up to 45 characters.

If it is an individual, enter the individual's surname (up to 20 characters), given name (up to 15 characters), and other name or initial (up to ten characters, if known) in fields D2, D3 and D4.

Fields D5, D6, D7, D8 and D9 Full address of the third party on whose behalf the EFT was ordered

Provide the full address of any third party on whose behalf the EFT was ordered, as follows:

- Enter the street address (up to 30 characters). This should be the third party'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 or zip code (up to nine characters).

If the address does not follow this format, enter the information in each of fields D5 to D9 based on your understanding of the address information, and according to the number of characters available in each field.

Field D10 Individual's birth date

If the EFT was ordered on behalf of a third party that is an individual, enter the date of birth of that individual. 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. If the third party was an entity, leave this field blank.

Field D11 Individual's occupation

If the EFT was ordered on behalf of a third party that is an individual, enter the occupation of that individual. Field D11 can contain up to 30 characters. If the third party was an entity, leave this field blank.

Field D12 Individual's identifier

If the EFT was ordered on behalf of a third party that is an individual, select the document used to identify that individual. If the selections provided do not cover the identifier used, indicate "Other" and provide details (up to 20 characters) in the appropriate field.

If the third party was an entity, leave this field blank.

If you select "Next" underneath field D12, you will go on to Part E (Information about the individual or entity receiving the payment instructions for the EFT). You can also do this by selecting "E – Receiver" from the left side menu. If you want to move on to any other part of the report, select that part from the left side menu. If you select "Previous", you will go to Part C.

Part E: Information about the individual or entity receiving the payment instructions for the EFT

In the case of an incoming EFT, this part is for information about you as the reporting entity receiving the payment instructions.

Fields E1* or E2*, E3* and E4 Full name of individual or entity receiving the payment instructions

In the case of an incoming EFT, this information should be about the reporting entity that received the payment instructions. This information will therefore be displayed based on your information at log on and the reporting entity for which you are reporting.

Field E5* Reporting entity's location number

This field has to contain the location number that represents information about the full address of the individual or entity receiving the payment instructions. 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 E5.

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

The full address of the individual or entity sending the payment will therefore be displayed based on your information at log in and the information in field E5.

If you select "Next" underneath the address information, you will go on to Part F (Information about the client to whose benefit payment is made). You can also do this by selecting "F – Beneficiary" from the left side menu. If you want to move on to any other part of the report, select that part from the left side menu. If you select "Previous", you will go to Part D.

Part F: Information about the client to whose benefit payment is made This part is for information about the individual or entity to whose benefit the payment of the EFT was made (or will be made).

Fields F1*or F2*, F3* and F4 Full name of client to whose benefit payment is made

Enter the full name of the client to whose benefit payment is made.

If the client is an entity, enter the complete name of the entity in field F1. This field can contain up to 45 characters.

If it is an individual, enter the individual's surname (up to 20 characters), given name (up to 15 characters), and other name or initial (up to ten characters, if known) in fields F2, F3 and F4.

If the transaction is reportable as one of multiple EFT transactions of less than \$10,000 each and, because of this, information for field F1 or fields F2 and F3 was not obtained at the time of the transaction (and is not available from your records), you can leave these fields blank.

Fields F5, F6, F7, F8 and F9 Full address of the client to whose benefit payment is made

Provide the full address of the individual or entity to whose benefit payment is made, as follows:

- Enter the street address (up to 30 characters). This should be the individual's or 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 or zip code (up to nine characters).

If the address does not follow this format, enter the information in each of fields F5 to F9 based on your understanding of the address information, and according to the number of characters available in each field.

Field F10 Client's telephone number

Enter the telephone number, including the area code, of the individual or entity to whose benefit payment is made.

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: "999-99999".

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" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

Field F11 Individual's birth date

If the client to whose benefit payment is made is an individual, enter the date of birth of that individual. 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. If the client is an entity, leave this field blank.

Field F12 Individual's occupation

If the client to whose benefit payment is made is an individual, enter the occupation of that individual. Field F12 can contain up to 30 characters. If the client is an entity, leave this field blank.

Field F13* Client's account number (if applicable)

Enter the account number (if any) that you have for the client to whose benefit payment will be made. Field F13 can contain up to 30 characters.

Field F14 Individual's identifier

If the client to whose benefit payment is made is an individual, select the document used to identify that individual.

In the case of an incoming EFT, 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.

If the client is an entity, leave this field blank.

If you select "Next" underneath field F14, you will go on to Part G (Information about the third party if the client to whose benefit the payment is made is acting on behalf of a third party). You can also do this by selecting "G – Beneficiary's third party" from the left side menu. If you want to move on to any other part of the report, select that part from the left side menu. If you select "Previous", you will go to Part E.

Part G: Information about the third party if the client to whose benefit the payment is made is acting on behalf of a third party (if applicable)

This part is for information about any third party on whose behalf the EFT payment is made.

If there is no third party related to the EFT payment, do not complete this part. In this case, read the information about "Next" following the information about field G12.

Fields G1 or G2, G3 and G4 Full name of the third party on whose behalf the EFT was paid

Enter the full name of any third party on whose behalf the EFT was paid (or is to be paid).

If the third party is an entity, enter the complete name of the entity in field G1. This field can contain up to 45 characters.

If it is an individual, enter the individual's surname (up to 20 characters), given name (up to 15 characters), and other name or initial (up to ten characters, if known) in fields G2, G3 and G4.

Fields G5, G6, G7, G8 and G9 Full address of the third party on whose behalf the EFT was paid

Provide the full address of any third party on whose behalf the EFT was paid (or is to be paid), as follows:

- Enter the street address (up to 30 characters). This should be the third party'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 or zip code (up to nine characters).

If the address does not follow this format, enter the information in each of fields G5 to G9 based on your understanding of the address information, and according to the number of characters available in each field.

Field G10 Individual's birth date

If the EFT was paid (or is to be paid) on behalf of a third party that is an individual, enter the date of birth of that individual. 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. If the third party is an entity, leave this field blank.

Field G11 Individual's occupation

If the EFT was paid (or is to be paid) on behalf of a third party that is an individual, enter the occupation of that individual. Field G11 can contain up to 30 characters. If the third party is an entity, leave this field blank.

Field G12 Individual's identifier

If the EFT was paid (or is to be paid) on behalf of a third party that is an individual, select the document used to identify that individual.

In the case of an incoming EFT, 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.

If the third party was an entity, leave this field blank.

If you select "Next" underneath field G12, you will go on to review the validation for this report. If you select "Previous", you will go to Part F.

Appendix 2: Navigation Through Non-SWIFT EFT Report Screens

To access the reporting screens for non-SWIFT EFT reports, you have to be logged on to F2R. Select the "Reporting" area from the left side menu bar, and select one of the following:

Create a new report

To create a new report, select the electronic funds transfer report (incoming or outgoing) 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 can do this in either of the following ways:

- Select the "New report" from the left side menu.
 When you select a report from this group, you will complete a blank report and will have to type or select the information for all applicable fields.
- Select "Use template" from the left side menu. Templates enable you to automate some of the report creation process. When you use a template for an electronic funds transfer report, the parts or fields saved in the template will be pre-populated in the report you are completing. Once you or other users have created and saved a template for a report, that template is available to all users who can complete this type of report. To create a template or to edit or delete an existing template, select "Template maintenance" from the left side menu.

Continue working on a report

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 FINTRAC-generated 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 EFTO or EFTI

You will start with the screen for General Information. The menu on the left hand side enables you to move around to the other screens for each part. You can

complete your EFT report in any order. 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. Select "Next" at the bottom of any part to move on to the next, or select the part you wish to go to next from the left side menu. Parts D and G are only required if applicable in the case of the EFT being reported.

Changing the contact information (from the drop-down menu above field 2 in the General Information Part) will cause your screen to refresh. This means that you may have to wait a few seconds after making that entry.

Outline view

To view an outline summary of your report at any time, select "EFTO" or "EFTI" from the top of the left menu, or from the breadcrumb trail at the top of the screen (for example, "Home > Reporting > EFTO"). This provides an overview of each part of the report. 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 of your report, 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 Part G.

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 copy of report" in the left side menu. You are not required to keep a copy of the reports you make to FINTRAC, but you may choose to do so. Before the report is finally submitted, there are options to save and print. Once you have submitted the report to FINTRAC, you can no longer print or save it.

When your report is received, FINTRAC will send you 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.

Appendix 3: Scenarios for EFT Reports Involving Another Reporting Entity

Appendix 3A:

Scenarios for Outgoing EFT Reports Involving Another Reporting Entity

Appendix 3B:

Scenarios for Incoming EFT Reports Involving Another Reporting Entity

Appendix 3A: Scenarios for Outgoing EFT Reports Involving Another Reporting Entity

It can happen that a client requests a transfer of funds outside Canada and, instead of sending the EFT yourself, you order someone else that is a financial entity, a money services business or casino in Canada to send it. In this case, you have to make the related EFT report (EFTO) to FINTRAC **unless** you provide them with the client's name and address. The following example provides two different scenarios to explain how the required reports are to be completed in such cases.

Example

A client requests a money services business to send an international EFT of \$12,000 from Canada. The money services business does not send the EFT itself, but orders a financial entity in Canada to do so. For the purposes of this example, the financial entity does **not** send the EFT as a SWIFT member of the SWIFT network. Also for the purposes of this example, **neither** the client ordering the EFT from the money services business **nor** the beneficiary of the EFT is acting on behalf of a third party.

Scenario 1

The money services business provides the client's name and address to the financial entity. In this scenario, the money services business does **not** send an EFTO report to FINTRAC. Only the financial entity must report the EFT to FINTRAC, as follows:

- Part A is for general information about the transaction.
- In Part B, the financial entity has to provide FINTRAC with the money services business' full name and full address, along with the rest of the information about the money services business, as the money services business is considered the client of the financial entity in this context.
- Part C is for information about the financial entity, as the reporting entity.
- Part D applies to this report because the money services business is ordering the EFT on a client's behalf. The financial entity will provide the information about the money services business' client, as provided by the money services business.
- Part E is for information about the individual or entity outside Canada
 who will be receiving the EFT instructions. It is about the bank or other
 type of financial service provider who will receive the EFT instructions
 to provide payment to the beneficiary.

- Part F is for information about the beneficiary to whose benefit the EFT is sent.
- Part G does not apply to this report because, in this example, the EFT's beneficiary is not acting on anyone else's behalf. In other words, there is no beneficiary's third party.

Scenario 2

The money services business does **not** provide the client's name and address to the financial entity. In this scenario, the money services business and the financial entity must **both** report the EFT to FINTRAC. The following table shows the similarities and differences for the two reports.

	Money services business' EFTO report	Financial entity's EFTO report
Part A	General information about the transaction.	General information about the transaction.
Part B	The money services business has to provide FINTRAC with the client's full name and full address, along with the rest of the information about their client.	The financial entity has to provide FINTRAC with information about the money services business, as the money services business is considered the client ordering the EFT from the financial entity in this context.
Part C	Information about the money services business, as the reporting entity.	Information about the financial entity, as the reporting entity.
Part D	Does not apply to this report because the money services business' client is not ordering the EFT on anyone else's behalf. In other words, there is no ordering client's third party.	Does not apply to this report because the money services business is not providing information about their client to the financial entity and the money services business is required to provide that information in their own report to FINTRAC. In other words, there is no ordering client's third party.
Part E	Information about the individual or entity outside Canada who will be receiving the EFT instructions. This is not about the financial entity that is being ordered to send the EFT. It is about the bank or other type of financial service provider outside Canada who will receive the EFT instructions to provide payment to the beneficiary.	Information about the individual or entity outside Canada who will be receiving the EFT instructions. It is about the bank or other type of financial service provider outside Canada who will receive the EFT instructions to provide payment to the beneficiary.

	Money services business' EFTO report	Financial entity's EFTO report
Part F	Information about the beneficiary to	Information about the beneficiary to
	whose benefit the EFT is sent.	whose benefit the EFT is sent.
Part G	Does not apply to this report	Does not apply to this report because
	because the beneficiary is not	the EFT's beneficiary is not acting on
	acting on anyone else's behalf. In	anyone else's behalf. In other words,
	other words, there is no	there is no beneficiary's third party.
	beneficiary's third party.	

Note: For information about the contents of the financial entity's report if the EFT were sent as a SWIFT message, refer to the scenarios explained in *Guideline 8B: Submitting SWIFT Electronic Funds Transfer Reports to FINTRAC.*

Appendix 3B: Scenarios for Incoming EFT Reports Involving Another Reporting Entity

If you receive an electronic funds transfer from outside Canada, some of the information required in your report to FINTRAC is provided by the individual or entity sending you the instructions. The following example provides two different scenarios to explain how the required reports are to be completed in such cases.

Example

A European funds transfer business, at the request of an individual client in Europe, sends an EFT of \$12,000 to be paid to an individual in Canada through a particular financial entity (to be referred to in this example as Bank 1). The European business does not have a relationship with Bank 1, but does with another financial entity in Canada (to be referred to in this example as Bank 2). The EFT is therefore sent from the European business to Bank 2, for payment to a client of Bank 1.

For the purposes of this example, the EFT is not sent through the SWIFT network. Also for the purposes of this example, **neither** the client ordering the EFT in Europe **nor** the beneficiary of the EFT in Canada is acting on behalf of a third party.

Even if the ultimate beneficiary is a client of Bank 1, Bank 2 must report to FINTRAC, as it is the first to receive the EFT in Canada. Depending on whether or not the name and address of the beneficiary was included in the EFT, Bank 1 may also have to report to FINTRAC, as explained in the following scenarios.

Scenario 1

The EFT contains the name and address of Bank 1's client. In this scenario, Bank 1 does not report to FINTRAC. Bank 2 reports the incoming EFT (EFTI) to FINTRAC, as follows:

- Part A is for general information about the transaction.
- In Part B, Bank 2 must provide FINTRAC with the European business' client's full name and, if applicable, the client's account number. In addition, if the information is available at the time of the transaction or in Bank 2's records, Bank 2 has to provide the European business' client's full address, telephone number, date of birth, occupation, identifier and identifier number.
- Part C is for information about the European business sending the EFT.
- Part D does not apply to this report because, in this example, the European business' ordering client is not acting on anyone else's behalf. In other words, there is no ordering client's third party.

- Part E is for information about Bank 2, as the reporting entity.
- Part F is for information about the beneficiary to whose benefit the EFT is sent. In this scenario, Bank 2 must provide Bank 1's client's full name, full address, and, if applicable, the client's account number. In addition, Bank 2 has to provide the client's telephone number, date of birth, occupation and identifier if any of that information is available at the time of the transaction or in Bank 2's records.
- Part G does not apply to this report because, in this example, the EFT's beneficiary is not acting on anyone else's behalf. In other words, there is no beneficiary's third party.

Scenario 2

The EFT does **not** contain the name and address of Bank 1's client. In this scenario, both Bank 1 and Bank 2 report the incoming EFT (EFTI) to FINTRAC.

The following table shows the similarities and differences for the two reports.

	Doub 0	Doub 4
	Bank 2	Bank 1
	EFTI report	EFTI report
Part A	General information about the	General information about the
	transaction.	transaction.
Part B	Bank 2 has to provide FINTRAC with	Bank 1 has to provide FINTRAC with
	the European business' client's full	the European business' client's full
	name and, if applicable, the client's	name and, if applicable, the client's
	account number. In addition, if the	account number. In addition, if the
	information is available at the time of	information is available at the time of
	the transaction or in Bank 2's	the transaction or in Bank 1's
	records, Bank 2 has to provide the	records, Bank 1 has to provide the
	European business' client's full	European business' client's full
	address, telephone number, date of	address, telephone number, date of
	birth, occupation, identifier and	birth, occupation, identifier and
	identifier number.	identifier number.
Part C	Part C is for information about the	Part C is for information about the
	European business sending the	European business sending the
	EFT.	EFT.
Part D	Does not apply to this report	Does not apply to this report
	because the European business'	because the European business'
	ordering client is not acting on	ordering client is not acting on
	anyone else's behalf. In other words,	anyone else's behalf. In other words,
	there is no ordering client's third	there is no ordering client's third
	party.	party.

	Bank 2	Bank 1
	EFTI report	EFTI report
Part E	Information about Bank 2, as the	Information about Bank 1, as the
	reporting entity.	reporting entity.
Part F	Part F is for information about the beneficiary to whose benefit the EFT is sent. In this scenario, Bank 2 must provide Bank 1's full name, and, if applicable, Bank 1's account number. In addition, Bank 2 has to provide Bank 1's full address and telephone number if any of that information is available at the time of the transaction or in Bank 2's	Information about the beneficiary to whose benefit the EFT is sent. In this scenario, Bank 2 must provide its client's full name and, if applicable, the client's account number. In addition, Bank 1 has to provide its client's full address and telephone number if any of that information is available at the time of the transaction or in Bank 1's
Part G	records. Does not apply to this report	records. Does not apply to this report
	because the beneficiary is not acting on anyone else's behalf. In other words, there is no beneficiary's third party.	because the EFT's beneficiary is not acting on anyone else's behalf. In other words, there is no beneficiary's third party.

Note: Bank 2 in the above scenarios has to take reasonable measures to ensure that the EFT includes originator information. For more information about this requirement for both incoming and outgoing EFTs, see *Guideline 6: Record Keeping and Client Identification.*