Guideline 3B: Submitting Suspicious Transaction Reports to FINTRAC by Paper

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This replaces the previous version of *Guideline 3B: Submitting Suspicious Transaction Reports to FINTRAC by Paper* issued in May 2003. The changes made to this version are indicated by a side bar to the right of the modified text.

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#### 1 General

The following have to report suspicious and certain other transactions to the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC):

- financial entities (such as banks or authorized foreign banks with respect to their operations in Canada, credit unions, caisses populaires, trust and loan companies and agents of the Crown that accept deposit liabilities);
- life insurance companies, brokers and independent agents;
- securities dealers, portfolio managers and investment counsellors;
- foreign exchange dealers and money services businesses (for guidance on who is engaged in the business of money services or foreign exchange dealing, refer to the FINTRAC Interpretation Notice on this topic available from the Publications area of FINTRAC's Web site);
- agents of the Crown that sell or redeem money orders;
- accountants and accounting firms, when carrying out certain activities on behalf
  of their clients or when receiving professional fees to engage in any of those
  activities.
- real estate brokers or sales representatives, when carrying out certain activities on behalf of their clients; and
- casinos (for a description of a casino in this context, see *Guideline 6F: Record Keeping and Client Identification for Casinos*).

If you are one of these "reporting entities", this guideline has been prepared by FINTRAC to help you submit suspicious transaction reports by paper. It explains reporting timelines, how reports have to be sent to FINTRAC, and what information has to be included in these reports.

For the purposes of suspicious transactions, an employee of any of the reporting entities described above is also a "reporting entity". If you are an employee and you have to submit a suspicious transaction report on your own behalf (that is, not on behalf of your employer), this guideline will explain how to submit the report.

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 persons and entities to implement a regime to ensure compliance with their obligations under the Proceeds of Crime (Money Laundering) and Terrorist Financing Act and associated Regulations.
- Guideline 5: Submitting Terrorist Property Reports to FINTRAC explains to reporting persons and entities when and how to submit a terrorist property report.
- Guideline 6: Record Keeping and Client Identification explains the requirement for reporting persons and entities to identify their clients and keep records. There are eight different versions of Guideline 6, by 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 EFT reports. There are three different versions of Guideline 8, by report type 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.

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

Throughout this guideline, any references to dollar amounts (such as \$10,000) refer to the amount in Canadian dollars or its equivalent in foreign currency. Also throughout this guideline, the term "reporting entity" is used to refer to any person or entity required to report to FINTRAC.

## 2 Suspicious Transaction Reporting Requirements

## 2.1 Suspicious Transaction Reporting Timelines

If you are a reporting entity as described in Section 1, you have to send a suspicious transaction report to FINTRAC when there are reasonable grounds to suspect that a transaction is related to the commission of a money laundering offence or a terrorist financing offence.

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

You have to submit suspicious transaction reports to FINTRAC, containing specific information (see Section 4). Once you have determined that there are reasonable grounds to suspect that the transaction is related to the commission of a money laundering or terrorist financing offence, your report, including all required and applicable information, must be sent within 30 calendar days.

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

## 2.2 Other Reports

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

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

#### 2.3 Means of Reporting

#### **Electronic Reporting**

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

- A personal computer with the following characteristics:
  - 32 MB memory
  - 640 x 480 VGA video display (800 x 600 or higher is preferable)
  - any operating system running a Web browser, such as Internet Explorer (version 5.x or greater) or its equivalent; and
- An Internet connection

See *Guideline 3A: Submitting Suspicious Transaction Reports to FINTRAC Electronically* for more information on submitting reports to FINTRAC electronically.

#### **Exception for Employees and Suspicious Transaction Reports**

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

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

#### **Paper Reporting**

If you do **not** have the technical capabilities to send reports electronically, you must submit reports on paper. See Section 3 for more information on submitting suspicious transaction reports to FINTRAC by paper.

#### 2.4 Information to be Contained in a Suspicious Transaction Report

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

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

See Section 4 for more information about what has to be included in a suspicious transaction report.

## 3 Paper Reporting

### 3.1 How to Complete Paper Reports

If you do **not** have the technical capability (see Section 2.3), you have to submit paper reports to FINTRAC. In this case, forms are available for paper filing as follows:

- A file can be accessed and printed from the Publications section of FINTRAC's Web site (choose "reporting forms" from <a href="http://www.fintrac.gc.ca/">http://www.fintrac.gc.ca/</a>).
   If you do not have a computer or access to the Internet, you may be able to do this at your local library or any other public place with Internet access.
- Call 1-866-346-8722 for a copy to be faxed or mailed to you.

To ensure that the information provided is legible and to facilitate data entry, it would be preferable if the free-text areas of the paper reports (e.g., Part G) were completed using word-processing equipment or a typewriter. For reports completed by hand, the use of black ink and CAPITAL LETTERS is recommended.

See Section 4 for completion instructions. It includes details of what each field must contain for a suspicious transaction report and indicates which parts of the form you may need to make copies of before you complete your report.

## 3.2 How to Send Paper Reports to FINTRAC

There are two ways to send a paper report to FINTRAC:

• Fax: 1-866-226-2346; or

Mail to the following address:
 Financial Transactions and Reports Analysis Centre of Canada Section A
 234 Laurier Avenue West, 24<sup>th</sup> floor
 Ottawa, ON
 Canada K1P 1H7

## 3.3 Acknowledgement of Receipt of a Paper Report

FINTRAC will not send you any acknowledgement when your paper report has been received.

## 4 Instructions for Completing a Suspicious Transaction Report

The fields in this section correspond with the paper form called the *Suspicious Transaction Report*. As explained in Section 2.3, completing a paper report is only permitted if you do not have the capability to report electronically.

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

- Mandatory: All fields of a report marked with an asterisk (\*) have to be completed.
- Mandatory if applicable: The fields that have both an asterisk and "if 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.

When completing the paper form, enter the date and time when you begin completing it at the top of the form. If you have to file a correction to a report on paper, follow the instructions on the first page of the form. If you need to get a paper form, see Section 3.

There are eight parts on the *Suspicious Transaction Report* form, but some are only to be completed if applicable. To report a suspicious transaction, follow the following five steps:

- Step 1 Complete Part A to provide information about the reporting entity and about where the transaction took place.
- Step 2 Complete Part B1 to provide details about the transaction.
- Step 3 Complete Part B2 to provide details about the transaction's disposition. If
  the transaction's disposition was related to an account, also complete
  Part C. If the transaction's disposition was on behalf of a business, a
  corporation or other entity (other than an employee depositing cash into his
  or her employer's account), also complete Part E. If the transaction's
  disposition was on behalf of an individual (other than an employee
  depositing cash into his or her employer's account), complete Part F.

If there was more than one disposition for the transaction, repeat this step for each disposition.

• Step 4 — Complete Part D to provide information about the individual conducting the transaction.

• Step 5 — Complete Part G to explain the reason for your suspicion. Also, complete Part H to provide information about any action taken, if applicable.

If you have to include more than one transaction in your report, repeat steps 2, 3 and 4 for each one. You may need to use extra copies of Parts B1, B2, C, D, E or F to complete your report.

The rest of this section will cover each part of the Suspicious Transaction Report form.

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

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

If you need more information about what type of person or entity is a reporting entity, see Section 1 of this guideline.

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

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

If you are an **employee** of a reporting entity and you are making this report about a suspicious transaction that you did **not** report to your superior, there are special instructions for you to complete several of the fields in this part.

#### Field A1\* Reporting entity's identifier number (if applicable)

This is the institution or license number, or other identification number for the reporting entity, as outlined below. If you are a reporting entity that has several branch locations, the identification number should refer to the branch or office where the transaction occurred.

• If you are an **accountant**, enter your provincial chartered accountant (CA), provincial certified management accountant (CMA), or provincial certified general accountant (CGA) number.

- If you are a **bank**, **caisse populaire**, **cooperative credit society** or **credit union**, enter your financial institution number issued by the Canadian Payments Association (CPA).
- If you are an **agent of the Crown that sells or redeems money orders**, enter your post office or similar number.
- If you are a **life insurance broker or agent**, enter your provincial broker or agent license number.
- If you are a **federally regulated life insurance company**, enter your Office of the Superintendent of Financial Institutions (OSFI) Institution Code.
- If you are a **life insurance company that is not federally regulated**, enter your provincial license number.
- If you are a **provincial savings office**, enter your financial institution number issued by the Canadian Payments Association (CPA).
- If you are a **real estate broker or sales representative**, enter your provincial broker number.
- If you are a **securities dealer**, enter your provincial dealer license number.
- If you are a **trust and loan company**, enter your financial institution number issued by the Canadian Payments Association (CPA).
- If you are a **provincial trust and loan** that is not a member of the CPA, enter your registration number.
- If you are a **foreign exchange dealer** or a **money services business**, an identifier number is not applicable to you. Leave this field blank.

If you are an **employee** of a reporting entity and you are making this report about a suspicious transaction that you did **not** report to your superior, enter "**EMPLOYEE**" in field A1.

#### Field A2\* Reporting entity's full name

Enter the full legal name of the business or corporation that is the reporting entity. If you are a reporting entity that does not have a business name (for example, you are a reporting entity that is an individual), enter your full name.

If you are an **employee** of a reporting entity and you are making this report about a suspicious transaction that you did **not** report to your superior, enter your **own** name in field A2.

#### Fields A3\* to A6\* Reporting entity's full address

Enter the civic address, town or city, province and postal code where the transaction took place. If you have more than one location, this information should refer to where the transaction took place. As explained above, transactions that happened at different branch or office locations should be reported on separate reports.

If you are an **employee** of a reporting entity and you are making this report about a suspicious transaction that you did **not** report to your superior, enter the complete address of where the transaction took place in fields A3 to A6.

### Field A6A Reporting entity report reference number

If you use a 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 and must be unique for each of your reporting entity's reports.

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

#### Fields A7\*, A8\* and A9 Contact name

Enter the name of the individual FINTRAC can contact for clarification about this report.

If you are an **employee** of a reporting entity and you are making this report about a suspicious transaction that you did **not** report to your superior, enter your **own** contact information in these fields.

## Field A10\* Contact telephone number

Enter the telephone number, including the area code, of the individual FINTRAC can contact for clarification. Include the extension if applicable in field A10A.

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

Enter the type of activity applicable to you. If you are involved in more than one activity type, indicate the one applicable to the transaction being reported. If there is more than one activity for one or more transactions on the report, check only one box to indicate your principal type of activity, and provide additional details in Part G.

If you are an **employee** of a reporting entity and you are making this report about a suspicious transaction that you did **not** report to your superior, enter they type of reporting entity **for your employer** in this field.

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

This part is for information about how the transaction was initiated (i.e., where the money came from) for the transaction that led you to the suspicion of a connection to money laundering or terrorist financing. Your suspicion could be based on a series of transactions. In that case, include in this report the information for each transaction that led to the suspicion.

When you need to report more than one transaction, complete a separate Part B1 for each transaction. To do this, you can copy Part B1. Fill in the "Transaction \_\_\_\_ of \_\_\_" area at the top of Part B1 to distinguish between each transaction. When you provide the details of the transaction in Part D, the details of disposition in Part B2, as well as the additional details of disposition in Parts C, E, and F, as applicable, indicate to which transaction that information applies.

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

Enter the date (yyyy-mm-dd) and time (hh:mm:ss) of the suspicious transaction. Use a 24-hour format for time. For example, enter "15:30:00" to represent 3:30 p.m.

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

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

#### Field B4 Date of posting

Enter the date (yyyy-mm-dd) the transaction cleared, if this differs from the date of the transaction provided above.

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

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

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

#### Field B6\* Amount of transaction

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

If this amount was not in Canadian funds, you do not have to convert it but you have to provide the currency information in field B7.

#### Field B7\* Transaction currency code

Enter the currency code applicable to the transaction, even if it was in Canadian funds. Enter CAD for Canadian dollars or USD for United States dollars. If the transaction was in another type of currency, see the list of currency codes in Appendix 1 at the end of this guideline.

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

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

other person or institution was involved, put the information about the others in Part G.

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

Check the appropriate box to indicate how the transaction was conducted. For example, if the transaction was done through an automated banking machine, check that box. If the selections provided do not cover this particular transaction, indicate "Other" and provide details in the field provided.

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

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

#### Part B2: Information about how the transaction was completed

This part is for information about how the transaction was completed (i.e., where the money went).

#### "On behalf of" indicator

At the top of Part B2, you have to indicate whether the person who conducted the transaction was doing so on anyone else's behalf. You have to select one of the following for this entry:

## • Not applicable

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

#### • On behalf of an entity

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

#### • On behalf of another individual

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

#### Employee depositing cash to employer's account

This indicates that the disposition was an employee depositing cash to his or her employer's account. If it was an employee depositing cash to his or her employer's account, **neither** Part E **nor** Part F applies for this report.

### More than one disposition

There could be more than one disposition for a particular transaction. For example, your client could initiate a transaction in cash, send an electronic funds transfer (EFT) for part of it (disposition 1), order a bank draft for another part (disposition 2) and deposit the rest (disposition 3). In that case, make sure you include the information for each disposition. If you are including more than one transaction in this report, you have to complete Part B2 for all dispositions for each transaction.

If you have to include more than one disposition, complete a separate Part B2 for each one. To do this, you can copy Part B2. Fill in the "Transaction \_\_\_\_\_ Disposition \_\_\_\_\_ of \_\_\_\_" area at the top of Part B2 to distinguish between each disposition. If you have to include more than one transaction in this report, indicate to which transaction the disposition information applies, based on the number you assigned the transaction in Part B1. When you provide the details of disposition in Parts C, E, and F, as applicable, also indicate to which disposition and which transaction that information applies.

### **Field B12\* Disposition of funds**

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

If the disposition of funds was a life insurance policy purchase or deposit, check that box and provide the life insurance policy number in the appropriate field. If the selections provided do not cover this particular disposition, indicate "Other" and provide details in the appropriate field.

## Field B13\* Amount of disposition

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

#### Field B14\* Disposition currency code

Enter the code for the currency of the disposition, even if it was in Canadian funds. Enter CAD for Canadian dollars or USD for United States dollars. If the transaction was in another type of currency, see the list of currency codes in Appendix 1 at the end of this guideline.

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

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

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

#### Part C: Account information, if the transaction involved an account

This part is for information about the account involved in the transaction, if it in fact involved an account. As explained earlier, it is possible to have more than one transaction per report, and more than one disposition per transaction. Provide the account information, if applicable, for each disposition included in the report.

If you have to include account information for more than one disposition, complete a separate Part C to provide information for each account involved. To do this, you can copy Part C. Fill in the "Transaction \_\_\_\_\_ Disposition \_\_\_\_\_" area at the top of Part C to distinguish between each disposition, based on the number you assigned the disposition in Part B2.

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

Enter the branch number, transit number, or other appropriate identifying number of the entity where the relevant account is held, if an account is applicable to the transaction.

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

Enter the number of the relevant account.

## Field C3\* Type of account (if this Part is applicable)

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

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

Enter the code of the currency for the relevant account. Enter CAD for Canadian dollars or USD for United States dollars. If the account is in another type of currency, see the list of currency codes in Appendix 1 at the end of this guideline.

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

Enter the full name of each account holder (up to three).

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

The account holder might be different from the individual(s) authorized to give instructions for the account. For example, an account for a corporation will have one or more individuals authorized to give instructions for that account. In this case, it is the name of the corporation that holds the account that is required in field C5.

Information about individuals authorized to bind the entity or to act with respect to the account belongs in Part E, if applicable, in field E12.

#### Field C6 Date opened

Enter the date (yyyy-mm-dd) the account was opened.

#### Field C7 Date closed

Enter the date (yyyy-mm-dd) the account was closed, if applicable.

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

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

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

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

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

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

If you need to report more than one transaction, complete a separate Part D for each transaction. To do this, you can copy Part D. Fill in the "Transaction \_\_\_\_" area at the top of Part D to distinguish between each transaction, based on the number you assigned the transaction in Part B1.

#### Fields D1 to D3 Individual's full name

Enter the last name, first name and middle initial (if applicable) of the individual who conducted the transaction.

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

Enter the client number you issued to the individual who conducted the transaction, if applicable.

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

Enter the civic address, town or city, province or state, country and postal code of the individual who conducted the transaction.

## Field D10 Country of residence

Enter the country of permanent residence of the individual who conducted the transaction.

### Field D10A Country of citizenship

Enter the country of citizenship of the individual who conducted the transaction.

## Field D11 Home telephone number

Enter the home telephone number, including the area code, of the individual who conducted the transaction.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: "999-99999".

If the number is from outside Canada or the United States, 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 D12 Individual's identifier

Check the appropriate box to show the document used to identify the individual who conducted the transaction.

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

If the selections provided do not cover the identifier used, indicate "Other" and provide details in the field provided.

Please note that although a Social Insurance Number (SIN) card can be used for identification purposes for transactions such as the opening of an account, the SIN (i.e., the number) should not be provided on this form. If you used a SIN card and no other identifying document for the individual, indicate **SIN card** in the "Other" area of field D12, but do not provide the number in field D13.

#### Field D13 ID Number

Enter the number of the document described in field D12 that was used to identify the individual who conducted the transaction. Remember that a health card number is not acceptable for this purpose in some provinces. Furthermore, as explained above, a SIN should not be provided on this form. If the identifier document in field D12 (and D12A) is a SIN card, enter "N/A" in field D13 to indicate the number is not applicable.

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

Enter the province or state and country of issue of the document used to identify the individual who conducted the transaction.

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

Enter the date (yyyy-mm-dd) of birth of the individual who conducted the transaction.

## Field D17 Individual's occupation

Enter the occupation of the individual who conducted the transaction.

## Field D18 Individual's business telephone number

Enter the business telephone number, including the area code, of the individual who conducted the transaction. Include the extension if applicable at field D18A.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: "999-99999".

If the number is from outside Canada or the United States, 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 D19 Individual's employer

Enter the name of the entity or person who is the employer of the individual who conducted the transaction.

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

Enter the civic address, town or city, province or state, country and postal code of the employer of the individual who conducted the transaction.

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

Enter the business telephone number, including the area code, of the employer of the individual who conducted the transaction. Include the extension if applicable at field D25A.

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

If the number is from outside Canada or the United States, 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.

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

This part only applies if the transaction's disposition was conducted on behalf of a third party that is an entity, as indicated in Part B2. If an employee deposited cash in his or her employer's account, Part E does not apply.

Complete a separate Part E for each disposition that was conducted on behalf of a business, corporation or other entity. To do this, you can copy Part E. Fill in the "Transaction \_\_\_\_\_ Disposition \_\_\_\_\_" area at the top of Part E to distinguish between each disposition, based on the number you assigned the disposition in Part B2.

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

Enter the full name of the business, corporation, trust or other entity on whose behalf the transaction was conducted.

### Field E2 Type of business

Describe the type of business or entity on whose behalf the transaction was conducted.

## Fields E3 to E7 Full address of business or corporation

Enter the civic address, town or city, province or state, country and postal code of the business, corporation or other entity on whose behalf the transaction was conducted.

### Field E8 Business telephone number

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

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

If the number is from outside Canada or the United States, 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.

### **Fields E9 to E11 Incorporation information**

If the transaction was conducted on behalf of an entity that is a corporation, provide the incorporation number. Also provide the province or state and country of the incorporation number's place of issue. If an incorporation number does not exist for the corporation, enter "N/A" in fields E9, E10 and E11.

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

Provide the names of up to three individuals who have authority to conduct transactions through the account.

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

This part only applies when the transaction's disposition was conducted on behalf of a third party that is an individual, as indicated in Part B2.

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

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

Complete a separate Part F for each disposition that was conducted on behalf of an individual. To do this, you can copy Part F. Fill in the "Transaction \_\_\_\_\_ Disposition \_\_\_\_\_" area at the top of Part F to distinguish between each disposition, based on the number you assigned the disposition in Part B2.

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

Enter the last name, first name and middle initial (if applicable) of the individual on whose behalf the transaction was conducted.

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

Enter the civic address, town or city, province or state, country and postal code of the individual on whose behalf the transaction was conducted.

## Field F9 Home telephone number

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

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, 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 F10 Business telephone number

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

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

If the number is from outside Canada or the United States, 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 date of birth

Enter the date of birth (yyyy-mm-dd) of the individual on whose behalf the transaction was conducted.

#### Field F12 Individual's identifier

Check the appropriate box to show the document used to identify the individual on whose behalf the transaction was conducted.

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 field provided.

Please note that although a Social Insurance Number (SIN) card can be used for identification purposes for transactions such as the opening of an account, the SIN (i.e., the number) should not be provided on this form. If you used a SIN card and no other identifying document for the individual, indicate **SIN card** in the "Other" area of field F12, but do not provide the number in field F13.

#### Field F13 ID number

Enter the number of the document described in field F12 that was used to identify the individual on behalf of whom the transaction was conducted. Remember that a health card number is not acceptable for this purpose in some provinces. Furthermore, as explained above, a SIN should not be provided on this form. If the identifier document in field F12 (and F12A) is a SIN card, enter "N/A" in field F13 to indicate the number is not applicable.

#### Field F14 Country of residence

Enter the country of permanent residence of the individual on whose behalf the transaction was conducted.

### Field F14A Country of citizenship

Enter the country of citizenship of the individual who conducted the transaction.

#### Fields F15 and F16 Place of issue

Enter the province or state and country of issue of the document used to identify the individual on whose behalf the transaction was conducted.

#### Field F17 Individual's occupation

Enter the occupation of the individual on whose behalf the transaction was conducted.

### Field F18 Individual's employer

Enter the name of the entity or person who is the employer of the individual on whose behalf the transaction was conducted.

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

Enter the civic address, town or city, province or state, country and postal code of the employer of the individual on whose behalf the transaction was conducted.

## Field F24 Employer's business telephone number

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

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: "999-99999".

If the number is from outside Canada or the United States, 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 F25 Relationship of the individual named in Part D to the individual named above

Check the appropriate box to indicate the relationship of the person conducting the transaction to the individual on whose behalf the transaction was conducted.

If the selections provided do not cover the relationship, indicate "Other" and provide details in the appropriate field.

### Part G: Description of Suspicious Activity

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

### Field G1\* Description of suspicious activity

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

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

## Part H: Action Taken (if applicable)

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

## Field H1\* Action taken (if this Part is applicable)

Identify whether you have taken or will take any action as a result of the suspicious transaction, in addition to reporting to FINTRAC. For example, if you are also making a report to a law enforcement agency, indicate this in Part H.

#### 5 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 <a href="mailto:guidelines@fintrac.gc.ca">guidelines@fintrac.gc.ca</a>.

## 6 How to Contact FINTRAC

For further information on FINTRAC and its activities, and report submission, please go to FINTRAC's Web site (<a href="http://www.fintrac.gc.ca">http://www.fintrac.gc.ca</a>) or contact FINTRAC:

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

Toll-free: 1-866-346-8722

## **Appendix 1 — Currency Codes**

The rows **without** shading in this table contain **current currency codes** (based on ISO 4217). The **shaded** rows provide **retired codes**.

CODE	CURRENCY	ENTITY
ADP	Andorran Pesata	Andorra
AED	UAE Dirham	United Arab Emirates
AFA	Afghani	Afghanistan
AFN	Afghani	Afghanistan
ALL	Lek	Albania
AMD	Dram	Armenia
ANG		Netherlands Antilles (Bonaire, Curaçao, Saba, Sint Eustatius, Sint Maarten
AOA	Kwanza	Angola
AOK	Kwanza	Angola
AON	New Kwanza	Angola
ARP	Argentine Peso	Argentina
ARS	Argentine Peso	Argentina
ATS	Schilling	Austria
AUD		Australia, Christmas Island, Cocos (Keeling) Islands, Heard and McDonald Islands, Kiribati, Nauru, Norfolk Island, Tuvalu
AWF	Aruba Florin	Aruba
AWG	Aruban Guilder	Aruba
AZM	Manat	Azerbaijan
BAK	Convertible Mark	Bosnia, Herzegovina
BAM	Convertible Mark	Bosnia, Herzegovina
BBD	Barbados Dollar	Barbados
BDT	Taka	Bangladesh
BEC	Belgian Franc (convertible)	Belgium
BEF	Belgian Franc	Belgium
BEL	Belgian Franc (financial)	Belgium
BGL	Lev	Bulgaria
BGN	Lev	Bulgaria
BHD	Bahraini Dinar	Bahrain
BIF	Burundi Franc	Burundi
BMD	Bermudian Dollar	Bermuda
BND	Brunei Dollar	Brunei
BOB	Boliviano	Bolivia
BOP	Bolivian Peso	Bolivia
BOV	Mvdol	Bolivia

CODE	CURRENCY	ENTITY
BRC	Cruzeiro	Brazil
BRL	Brazilian Real	Brazil
BSD	Bahamian Dollar	Bahamas
BTN	Ngultrum	Bhutan
BTR	Bhutan Rupee	Bhutan
BUK	Kyat	Burma (Myanmar)
BWP	Pula	Botswana
BYR	Belarusian Ruble	Belarus
BZD	Belize Dollar	Belize
CAD	Canadian Dollar	Canada
CDF	Congolese Franc	Congo, Congo-Kinshasa
CDZ	New Zaire	Congo
CHE	WIR Euro	Switzerland
CHF	Swiss Franc	Switzerland, Liechtenstein
CHW	I.	Switzerland
CLF	Unidades de formento	Chile
CLP	Chilean Peso	Chile
CNY	Yuan Renminbi	China
COP	Colombian Peso	Colombia
COU	Unidad de Valor Real	Columbia
CRC	Costa Rican Colon	Costa Rica
CSD	Serbian Dinar	Serbia
CSK	Koruna	Czechoslovakia
CUP	Cuban Peso	Cuba
CVE	Cape Verde Escudo	Cape Verde
CYP	Cyprus Pound	Cyprus
CZK	Czech Koruna	Czech Republic
DDM	Mark der DDR	German Democratic Republic
DEM	Deutsche Mark	Germany
DJF	Djibouti Franc	Djibouti
DKK		Denmark, Faroe Islands, Greenland
DOP		Dominican Republic
DZD	Algerian Dinar	Algeria
ECS	Sucre	Ecuador
EEK	Kroon	Estonia
EGP		Egypt
ERN		Eritrea
ESP	Spanish Peseta	Spain
ETB	Ethiopian Birr	Ethiopia, Eritrea

CODE	CURRENCY	ENTITY
EUR	Euro	European Union: Austria, Belgium, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, Netherlands, Portugal, Spain. Others: Andorra, Azores, Balearic Islands, Canary Islands, Europa Island, French Guyana, French Southern Territories, Guadeloupe, Juan de Nova, Madeira Islands, Martinique, Mayotte, Monaco, Reunion, Saint Pierre & Miquelon, Saint-Martin, San Marino, Serbia and Montenegro, Vatican City
FIM	Markka	Finland
FJD	Fiji Dollar	Fiji
FKP	Falkland Islands Pound	Falkland Islands (Malvinas)
FRF	French Franc	France
GBP	Pound Sterling	United Kingdom, Canton and Enderbury Islands, South Georgia, South Sandwich Islands
GEL	Lari	Georgia
GHC	Cedi	Ghana
GIP	Gibraltar Pound	Gibraltar
GMD	Dalasi	Gambia
GNF	Guinea Franc	Guinea
GNS	Syli	Guinea
GQE	Ekwele	Equatorial Guinea
GRD	Drachma	Greece
GTQ	Quetzal	Guatemala
GWP	Guinea-Bissau Peso	Guinea-Bissau
GYD	Guyana Dollar	Guyana
HKD	Hong Kong Dollar	Hong Kong
HNL	Lempira	Honduras
HRK	Kuna	Croatia (Hrvatska)
HTG	Gourde	Haiti
HUF	Forint	Hungary
IDR	Rupiah	Indonesia
IEP	Irish Pound	Ireland
ILS	New Israeli Sheqel	Israel
INR	Indian Rupee	India, Bhutan
IQD	Iraqi Dinar	Iraq, Neutral Zone (between Saudi Arabia & Iraq)
IRR	Iranian Rial	Iran
ISK	Iceland Krona	Iceland
ITL	Lira	Italy
JMD	Jamaican Dollar	Jamaica
JOD	Jordanian Dinar	Jordan
JPY	Yen	Japan
KES	Kenyan Shilling	Kenya

CODE	CURRENCY	ENTITY
KGS	Som	Kyrgystan
KHR	Riel	Kampuchea (Cambodia)
KMF	Comorian Franc	Comoros
KPW	North Korean Won	Korea, Democratic People's of
KRW	Won	Korea, Republic of
KWD	Kuwaiti Dinar	Kuwait, Neutral Zone (between Saudi Arabia & Iraq)
KYD		Cayman Islands
KZT	Tenge	Kazakhstan
LAK	Kip	Laos
LBP	Lebanese Pound	Lebanon
LKR	Sri Lankan Rupee	Sri Lanka
LRD	Liberian Dollar	Liberia
LSL	Loti	Lesotho
LSM	Maloti	Lesotho
LTL	Litas	Lithuania
LUF	Luxembourg Franc	Luxembourg
LVL	Lat	Latvia
LYD	Libyan Dinar	Libyan Arab Jamahiriya
MAD	Moroccan Dirham	Morocco, Western Sahara
MDL	Molodavan Leu	Moldova
MGA	Malagasy Ariary	Madagascar
MGF	Malagasy Franc	Madagascar
MKD	Macedonia Denar	Macedonia
MLF	Mali Franc	Mali
MMK	Kyat	Myanmar
MNT	Tugrik	Mongolia
MOP	Pataca	Macau
MRO	Ouguiya	Mauritania
MTL	Maltese Lira	Malta
MTP	Maltese Pound	Malta
MUR	<u> </u>	Mauritius
MVR	Rufiyaa	Maldives
MWK		Malawi
MXN		Mexico
MXP		Mexico
MXV	Mexican Unidad de Inversion (UID)	Mexico
MYR	` '	Malaysia
MZM		Mozambique
NAD	Namibian Dollar	Namibia
NGN	1	Nigeria
NIC		Nicaragua
NIO		Nicaragua

CODE	CURRENCY	ENTITY
NLG	Netherlands Guilder	Netherlands
NOK	Norwegian Krone	Norway, Antarctica, Bouvet Island, Dronning Maud Land, Svalbard and Jan Mayen Islands
NPR	Nepalese Rupee	Nepal
NZD	New Zealand Dollar	New Zealand, Cook Islands, Niue, Pitcairn Island, Tokelau
OMR	Omani Rial	Oman
PAB	Balboa	Panama
PEN	Nuevo Sol	Peru
PES	Sol	Peru
PGK	Kina	Papua New Guinea
PHP	Philippine Peso	Philippines
PKR	Pakistan Rupee	Pakistan
PLN	Zloty	Poland
PLZ	Zloty	Poland
PTE	Portuguese Escudo	Portugal
PYG	Guarani	Paraguay
QAR	Qatari Rial	Qatar
ROL	Leu	Romania
RON	New Leu	Romania
RUB	Russian Ruble	Russian Federation
RUR	Russian Ruble	Russia, Tajikistan
RWF	Rwandan Franc	Rwanda
SAR	Saudi Riyal	Saudi Arabia, Neutral Zone (between Saudi Arabia & Iraq)
SBD	Solomon Island Dollar	sSolomon Islands
SBL	Luigino	Seborga
SCR	Seychelles Rupee	Seychelles
SDD	Sudanese Dinar	Sudan
SDP	Sudanese Pound	Sudan
SEK	Swedish Krona	Sweden
SGD	Singapore Dollar	Singapore
SHP	Saint Helena Pound	Saint Helena
SIT	Tolar	Slovenia
SKK	Slovak Koruna	Slovakia
SLL	Leone	Sierra Leone
SOS	Somali Shilling	Somalia
SRD	Surinam Dollar	Suriname
SRG	Suriname Guilder	Suriname
STD	Dobra	Sao Tome and Principe
SUR	Ruble	Belarus, Ukraine, Russia
SVC	El Salvador Colon	El Salvador
SYP	Syrian Pound	Syria

CODE	CURRENCY	ENTITY
SZL	Lilangeni	Swaziland
THB	Baht	Thailand
TJR	Tajikistani Ruble	Tajikistan
TJS	Somoni	Tajikistan
TMM	Manat	Turkmenistan
TND	Tunisian Dinar	Tunisia
TOP	Pa'anga	Tonga
TPE	Timor Escudo	East Timor
TRL	Old Turkish Lira	Turkey
TRY	New Turkish Lira	Turkey
TTD	Dollar	Trinidad and Tobago
TWD	New Taiwan Dollar	Taiwan
TZS	Tanzanian Shilling	Tanzania
UAH	Hryvnia	Ukraine
UGS	Uganda Shilling	Uganda
UGX	Uganda Shilling	Uganda
USD	US Dollar	United States, American Samoa, British Virgin Islands, British Indian Ocean Territory, Ecuador, El Salvador, Guam, Haiti, Mariana Islands, Marshall Islands, Micronesia, Palau, Panama, Puerto Rico, Timor Leste, Turks and Caicos Islands, U.S. Minor Outlying Islands, U.S. Virgin Islands
USN	US Dollar (next day)	
USS	US Dollar (same day)	
UYP	Uruguayan Peso	Uruguay
UYU	Uruguayan Peso	Uruguay
UZS	Som	Uzbekistan
VEB	Bolivar	Venezuela
VND	Dong	Vietnam
VUV	Vatu	Vanuatu
WST	Tala	Samoa
XAF	CFA Franc BEAC Communauté Financière Africaine	Cameroon, Central African Republic, Chad, Congo (Congo-Brazzaville), Equatorial Guinea, Gabon
XAG	Silver	
XAU	Gold	
XBA	Bond Markets Units European Composite Unit (EURCO)	
XBB	European Monetary Unit (E.M.U.– 6)	

CODE	CURRENCY	ENTITY
XBC	Euro. Unit of Acct. 9	
	(E.U.A9)	
XBD	Euro. Unit of Acct. 17	
	(E.U.A17)	
XCD	East Caribbean Dollar	Anguilla, Antigua & Barbuda, Dominica, Grenada,
		Montserrat, Saint Kitts-and-Nevis, Saint Lucia, Saint
		Vincent and the Grenadines
XDR		International Monetary Fund (IMF)
	Rights	
XEU		European Monetary Cooperation Fund (EMCF)
	Unit	
XFO		Special Settlement Currency
XFU	UIC-Franc	Special Settlement Currency
XOF		Benin, Burkino Faso, Côte d'Ivoire, Guinea-Bisau,
		Mali, Niger, Senegal, Togo
XPD	Palladium	
XPF	CFP Franc	French Polynesia, New Caledonia, Wallis and Futuna
XPT	Platinum	
YDD	Yemeni Dinar	Yemen, Democratic
YER	Yemeni Rial	Yemen
YUD	Yugoslavian Dinar	Yugoslavia
YUN	Yugoslav New Dinar	Yugoslavia, Montenegro & Serbia
ZAL	Rand (financial)	South Africa
ZAR	Rand	Lesotho, Namibia, South Africa
ZMK	Kwacha	Zambia
ZWD	Zimbabwe Dollar	Zimbabwe