

Suspicious Transaction Report (STR)

Please read the following before completing and submitting this form.

Prior to making a disclosure to the FIAU, the Money Laundering Reporting Officer or the reporting person (MLRO) is advised to consult Section 6.4 (External reporting procedures) and Section 6.5 (Actions after reporting) of the Implementing Procedures (Part I) which may be downloaded from the FIAU's [website](#).

Disclosures are to be made in the standard STR form which is to be completed by the MLRO, and should be submitted in those situations where the reporting entity knows, suspects or has reasonable grounds to suspect that a transaction may be related to proceeds of crime, money laundering or the funding of terrorism, or that a person may have been, is or may be connected with proceeds of crime, money laundering or the funding of terrorism, or that money laundering or the funding of terrorism has been, is being or may be committed or attempted.

All the information that supports the STR should be attached together with any additional information which could help the FIAU to further its analysis, including for example, the transaction history (preferably in Excel format) of any products or services provided by the reporting entity to the subjects of this report. If available, copies of the identification documents of any natural persons reported in the STR and copies of all the due diligence documentation collected by the reporting entity in respect of the legal and natural persons subject to this STR, should also be provided. The MLRO should also provide any information that may link the person, activity or transaction to a predicate offence.

In the case that, the number of legal and/or natural persons, the business relationship details, the product details or the number of main suspicious transactions reported in this STR exceeds the fields available in sections C, D, E and F, the STR supplementary form should be used and submitted as an attachment to this STR.

In some cases, screen tips are available. These may be accessed by hovering the mouse pointer over the fields.

Fields marked with an asterisk (*) are mandatory and must be completed by the reporting entity prior to submitting the STR to the FIAU.

The "Save For Final Submission" button at the end of the STR will automatically check the form and highlight the mandatory fields which have been omitted.

By clicking "Save For Further Review", the STR form may be saved on the user's own device.

The "Upload Area" button links the user to the FIAU website where the completed form could be uploaded.

Section A. Reporting Entity Details

Name of reporting entity*

Classification of reporting entity*

Other 'Classification of reporting entity'

Name of MLRO / (reporting person)*

Contact email*

Contact phone/mobile number

Date of STR*

Entity's STR reference number*

Is this report connected to an STR previously submitted by your entity?* Yes No

If the answer to the previous question is 'Yes', please provide the FIAU reference number/s of the previous report/s.

Section B. Summary of the STR

In this section, please provide a brief summary of the STR.

Summary of STR

1. Does this STR relate to suspected terrorist financing and/or terrorist activities?

2. Are any of the subjects being reported in this STR known to be Politically Exposed Person/s (PEP)?

3. Are you currently refraining from carrying out a transaction in accordance with Regulation 15(7)?

4. Type of STR

If the answer to question 4 is 'A specific set of transactions', please answer the next question, and provide details in section F

5. What is the approximate aggregate amount of funds suspected to be connected to ML/FT activities or proceeds of crime in Euro equivalent ? (Please do not double count the same funds flowing in and out).
Select approximate aggregate amount

6. Please tick any of the following suspected predicate offence/s which you deem to be relevant to this STR

Corruption and bribery

Counterfeiting and piracy of products

Counterfeiting currency

Environmental crime

Extortion

Forgery

Fraud

Fraud affecting the European Union financial interests

Illegal gambling

Illicit arms trafficking

Illicit trafficking in narcotic drugs and psychotropic substances

Illicit trafficking in stolen and other goods

Insider trading and market manipulation

Kidnapping, illegal restraint and hostage-taking

Murder, grievous bodily injury

Participation in an organised criminal group and racketeering

Piracy

Revenues from organising illegal gambling

Robbery or theft

Sexual exploitation, including sexual exploitation of children

Smuggling (including in relation to customs and excise duties and taxes)

Tax crimes (related to direct taxes and indirect taxes)

Terrorism, including terrorist financing

Trafficking in human beings and migrant smuggling

Usury

Other: Please specify below

Other

7. Please tick all ML/FT indicators which you deem relevant to this STR.

Subjects, or persons linked to subjects of STR are adversely known on open sources

Transaction activity which is unexplained or is inconsistent with known customer profile

Company and/or transaction structure is unnecessarily complex

Transfers to, or from, high-risk jurisdictions, without apparent economic business reason/sense

Customer became uncooperative when requested to provide required details and/or documentation on a transaction or operation

Unusual or suspicious identification documents or lack of documents

Proposed UBO/s changes after requesting identification details

Large volume of deposits which is not in line with customer's known profile

The majority of deposits and withdrawals are carried out through ATMs, thus avoiding face-to-face contact, which activity is not in line with customer's known profile

High turnover, but the account holds a low balance (E.g. conduit account activity)

Mismatch between the name of the beneficiary and the name of the bank account to be credited

Customer inexplicably stops contact

Over or under-pricing of goods and services

Real estate is bought without viewing, with excessive urgency, lack of concern on expenses, or in the name of third parties

High value purchases (E.g. property or high value assets) are paid in cash

Excessive or accelerated repayments of long term loans (especially in cash)

High value asset is sold shortly after being purchased

The anticipated source of payment of significant transactions (E.g. property or high value assets) is changed shortly before the purchase

Customer requests payment of proceeds to unrelated third parties

Loans secured by pledged assets held by third parties unrelated to the borrower

Purchase of life insurance policy: without concern of the product's performance, paid in cash, or appears outside the customer's range of financial wealth

Safe deposit box visits are not in line with customer's profile (excessive)

Remitting money to persons/entities (including NGOs) with suspected links to terrorism

Purchasing of flight tickets to, or adjacent to, conflict zones or areas where terrorism activity is known to be present, without apparent family or business connections to those places

Withdrawal of money from locations which are in, or adjacent to, conflict zones or areas where terrorism activity is known to be present, without apparent family or business connections to those places

Remitting money to locations which are in, or adjacent to, conflict zones or areas where terrorism activity is known to be present, without apparent family or business connections to those places

Transaction narrative is suspicious or does not make any commercial sense within the context of the transaction itself

Overall transactional activity is indicative of terrorist related activities such as (but not limited to): purchasing camping/survival stores, first person shooting games or combat training-type activities, before travelling to known, or adjacent to, conflict/terrorism zones

Selling off a significant part, or all, of one's personal assets, acquiring loans towards which insignificant or no payments are made, followed by travel and / or transactional activity to conflict zones or areas where terrorism activity is known to be active

Other

Section C - Subject/s of the STR

In this section, please provide the identification details of the legal and/or natural persons who are being reported in this STR.

Section C.1 - Subject/s of the STR - Legal person/s

C.1.1 Name of legal person (*do not include suffix*)

Suffix/type of legal entity (E.g. Plc, Ltd, Srl, LLC)

Date of incorporation

Registration number

Registered office

Country of registration

Nature of business

Is this legal person known to be a subject of a sanctions list?

Is the legal person being reported adversely known to open source information and/or intelligence databases? In the affirmative, kindly provide the link/s below and attach a soft copy of the information obtained as supporting information.

Web links

Is this person known to be the subject of a criminal investigation?

If known, please indicate country

Please provide the name and surname of the UBO/s of the above-mentioned legal person and their respective holding in percentage terms. Please also provide the UBO/s full identification details in section C.2.

| | |
|---------|-----------|
| UBO (1) | % holding |
| UBO (2) | % holding |
| UBO (3) | % holding |
| UBO (4) | % holding |

C.1.2 Name of legal person (*do not include suffix*)

Suffix/type of legal entity (E.g. Plc, Ltd, Srl, LLC)

Date of incorporation

Registration number

Registered office

Country of registration

Nature of business

Is this legal person known to be a subject of a sanctions list?

Is the legal person being reported adversely known to open source information and/or intelligence databases? In the affirmative, kindly provide the link/s below and attach a soft copy of the information obtained as supporting information.

Web links

Is this person known to be the subject of a criminal investigation?

If known, please indicate country

Please provide the name and surname of the UBO/s of the above-mentioned legal person and their respective holding in percentage terms. Please also provide the UBO/s full identification details in section C.2.

UBO (1) % holding

UBO (2) % holding

UBO (3) % holding

UBO (4) % holding

C.1.3 Name of legal person (*do not include suffix*)

Suffix/type of legal entity (E.g. Plc, Ltd, Srl, LLC)

Date of incorporation

Registration number

Registered office

Country of registration

Nature of business

Is this legal person known to be a subject of a sanctions list?

Is the legal person being reported adversely known to open source information and/or intelligence databases? In the affirmative, kindly provide the link/s below and attach a soft copy of the information obtained as supporting information.

Web links

Is this person known to be the subject of a criminal investigation?

If known, please indicate country

Please provide the name and surname of the UBO/s of the above-mentioned legal person and their respective holding in percentage terms. Please also provide the UBO/s full identification details in section C.2.

| | |
|---------|-----------|
| UBO (1) | % holding |
| UBO (2) | % holding |
| UBO (3) | % holding |
| UBO (4) | % holding |

Section C.2 - Subject/s of the STR - Natural person/s

C.2.1 Is this person a UBO of a legal person being reported in this STR?

| | | | |
|------------------------------|--------|------------------|----------------------|
| Title | Gender | Date of birth | <input type="text"/> |
| First Name | | | |
| Middle Name | | | |
| Last Name | | | |
| Country of birth | | | |
| Nationality | | | |
| Identification (ID) document | | Other type of ID | |
| Identification number | | Expires | |
| Residential address | | | |
| Country of residence | | | |

Known occupation

Terrorist/TF suspect?

PEP?

Is the person known to be listed on a sanctions list?

Is the person being reported adversely known to open source information and/or intelligence databases? In the affirmative, kindly provide the link/s below and attach a soft copy of the information obtained as supporting information.

Web links

Is this person known to be the subject of a criminal investigation?

If known, please indicate country

C.2.2 Is this person a UBO of a legal person being reported in this STR?

Title

Gender

Date of birth

First Name

Middle Name

Last Name

Country of birth

Nationality

Identification (ID) document

Other type of ID

Identification number

Expires

Residential address

Country of residence

Known occupation

Terrorist/TF suspect?

PEP?

Is the person known to be listed on a sanctions list?

Is the person being reported adversely known to open source information and/or intelligence databases? In the affirmative, kindly provide the link/s below and attach a soft copy of the information obtained as supporting information.

Web links

Is this person known to be the subject of a criminal investigation?

If known, please indicate country

C.2.3 Is this person a UBO of a legal person being reported in this STR?

| | | | |
|------------------------------|-----------------------|------------------|----------------------|
| Title | Gender | Date of birth | <input type="text"/> |
| First Name | | | |
| Middle Name | | | |
| Last Name | | | |
| Country of birth | | | |
| Nationality | | | |
| Identification (ID) document | | Other type of ID | |
| Identification number | | Expires | |
| Residential address | | | |
| Country of residence | | | |
| Known occupation | Terrorist/TF suspect? | PEP? | |

Is the person known to be listed on a sanctions list?

Is the person being reported adversely known to open source information and/or intelligence databases? In the affirmative, kindly provide the link/s below and attach a soft copy of the information obtained as supporting information.

Web links

Is this person known to be the subject of a criminal investigation?

If known, please indicate country

Section D - Business relationship information

Please provide information relating to the nature of the business relationship held with the person/s reported in Section C.

D.1 Name of subject being reported*

Service offered*

Status of business* Active Never initiated
 Terminated Termination in process

Date when business relationship was established

Date when business relationship was discontinued (if applicable)

D.2 Name of subject being reported

Service offered

Status of business Active Never initiated
 Terminated Termination in process

Date when business relationship was established

Date when business relationship was discontinued (if applicable)

D.3 Name of subject being reported

Service offered

Status of business Active Never initiated
 Terminated Termination in process

Date when business relationship was established

Date when business relationship was discontinued (if applicable)

D.4 Name of subject being reported

Service offered

Status of business Active Never initiated
 Terminated Termination in process

Date when business relationship was established

Date when business relationship was discontinued (if applicable)

Section F - Suspicious Transaction / Activity

If the answer to question number 4 in Section B of the STR Form was 'A specific set of transactions (or a single transaction) are considered to be suspicious', please provide the following details regarding the main suspicious transactions identified.

| | | | | | | | | |
|---|------|--------|-----|---------------------|--------------------------------|---------------------|---------------------|----------------------------------|
| 1 | Date | Amount | CCY | Pending Transaction | Country of Remitter Account | IBAN of Remitter | Name of Remitter | Narrative of transaction/Comment |
| | | | | | | | | |
| | | | | | Country of Beneficiary Account | IBAN of Beneficiary | Name of Beneficiary | |

| | | | | | | | | |
|---|------|--------|-----|---------------------|--------------------------------|---------------------|---------------------|----------------------------------|
| 2 | Date | Amount | CCY | Pending Transaction | Country of Remitter Account | IBAN of Remitter | Name of Remitter | Narrative of transaction/Comment |
| | | | | | | | | |
| | | | | | Country of Beneficiary Account | IBAN of Beneficiary | Name of Beneficiary | |

| | | | | | | | | |
|---|------|--------|-----|---------------------|--------------------------------|---------------------|---------------------|----------------------------------|
| 3 | Date | Amount | CCY | Pending Transaction | Country of Remitter Account | IBAN of Remitter | Name of Remitter | Narrative of transaction/Comment |
| | | | | | | | | |
| | | | | | Country of Beneficiary Account | IBAN of Beneficiary | Name of Beneficiary | |

| | | | | | | | | |
|---|------|--------|-----|---------------------|--------------------------------|---------------------|---------------------|----------------------------------|
| 4 | Date | Amount | CCY | Pending Transaction | Country of Remitter Account | IBAN of Remitter | Name of Remitter | Narrative of transaction/Comment |
| | | | | | | | | |
| | | | | | Country of Beneficiary Account | IBAN of Beneficiary | Name of Beneficiary | |

| | | | | | | | | |
|---|------|--------|-----|---------------------|--------------------------------|---------------------|---------------------|----------------------------------|
| 5 | Date | Amount | CCY | Pending Transaction | Country of Remitter Account | IBAN of Remitter | Name of Remitter | Narrative of transaction/Comment |
| | | | | | | | | |
| | | | | | Country of Beneficiary Account | IBAN of Beneficiary | Name of Beneficiary | |

Section G - Suspicious Transaction / Activity

Explanation/description of suspicious transaction/activity*

The suspicious transaction / activity should be described in a complete and clear manner. All facts should be given in a chronological order including what is unusual, irregular or suspicious about the natural/legal person, transaction or activity being reported. **(Annex additional sheets if required).**

Documents attached to this STR - provide list

Documents attached to this STR - (continued)

By submitting this STR, I, the MLRO identified hereunder, confirm that I am the author of this document and accept responsibility for the information provided herein and that the information is, to the best of my knowledge, true and correct.

The FIAU encourages subject persons to submit the STR using the FIAU's online portal, however, should the MLRO wish to submit this STR by hand, the MLRO is requested to sign this form in the field below and to deliver it to the FIAU offices.

Name of MLRO*

Signature (if not submitted electronically)