

AND UNUSUAL TRANSACTION REPORTS (STR) ON THE REGISTRATION AND REPORTING PLATFORM OF THE FINANCIAL INTELLIGENCE CENTRE WITH EFFECT 25 APRIL 2016

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22 April 2016



financial intelligence centre

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http://www.fic.gov.za/Secure/Queries.aspx

Objective of this user guide

The objective of this user guide is to define and outline the steps to be followed when submitting a Suspicious Transaction Report (STR) to the Financial Intelligence Centre (the Centre) in terms of section 29 of the FIC Act. Please note that the reporter must acquire login credentials on the Centre's registration and reporting platform in order to access the reporting platform. Please refer to Public Compliance Communication 05A for further guidance on registration on the registration and reporting platform.

This user guide is applicable to a person who carries on a business or is in charge of or manages a business or is employed by a business and includes all accountable institutions listed in Schedule 1 to the FIC Act and all reporting institutions listed in Schedule 3 to the FIC Act.

Access to the reporting platform

In order to submit STR to the Centre, the institution must access the portal provided by the Centre for this purpose on the Centre's website at www.fic.gov.za.

Legal Disclaimer

The Centre reserve the right to amend, modify or change the contents of this document.

Definitions

The guideline must be read in conjunction with the FIC Act and the Regulations in relation to the definitions of terms. In this guideline, unless the context indicates otherwise:

"AI/RI" refers to an Accountable Institution (listed in Schedule 1 to the FIC Act) and Reporting Institution (listed in Schedule 3 to the FIC Act).

"Business" refers to organisation or entity (ies) and can be used interchangeably.

"S43CO" refers to person who is tasked to submit reports to the Centre.

"FIC Act" refers to the Financial Intelligence Centre Act, 2001 (Act No 38 of 2001), as amended.

"Regulations" refer to the Money Laundering and Terrorist Financing Control Regulations made in terms of section 77 of the FIC Act and promulgated in Government Notice 1595 of 20 December 2002 as amended.

"goAML refers to the an integrated software solution implemented by the Centre as its preferred IT platform for registration, reporting, data collection, analysis, case management and secure communications required for the Centre's daily operational functions and requirements.

"STR" refers to a suspicious or unusual transaction report submitted in terms of Section 29 of the FIC Act.

Important information to remember when reporting on the Centre's reporting platform:

- Reports can only be submitted to the Centre on the reporting platform after the business has acquired login credentials on the Centre's registration and reporting platform. Please refer to Public Compliance Communication 05A and other relevant user guides on registration on the registration and reporting platform.
- All fields with an asterisk (*) are mandatory and should be completed.
- The user needs to consider business rules applicable to the various reports when reporting and apply them along with the applicable regulations and sections of the FIC Act.
- All First Letters must be in Capital Letters;
- Words typed in ALL Capital Letters are not allowed.



Table of Contents

Table	e of Contents	4
1. Ir	ntroduction	6
2.	goAML Web Icons	7
3. S	Suspicious Transaction Report (STR) Baseline Scenario	8
3.1	Field Definitions	8
3.2 E	Baseline scenario for submitting a single suspicious transaction report to the Centre with NO	oods
or ser	rvices – displaying fields A to H to be completed	10
3.3 E	Baseline scenario for submitting a single suspicious transaction report to the Centre WITH god	ds or
servic	ces – displaying fields A to H to be completed	11
3.4 E	Baseline scenario for submitting a multiple suspicious transaction reports to the Centre wit	ı NO
goods	s or services – displaying fields A to H to be completed	12
3.5 E	Baseline scenario for submitting a multiple suspicious transaction reports to the Centre with $\mathfrak g$	oods
or ser	rvices – displaying fields A to H to be completed	13
4. A	ccessing goAML	14
4.1 g	oAML platform landing page	15
5. C	Capturing a Suspicious Transaction Report	16
5.1	Select a new Report	16
5.2	Reporting template- overview	16
BASE 5.3	ELINE SCENARIO FIELD A – REPORT TYPESelect Report Type	17 17
FIELD 5.4.	D BASELINE SCENARIO B – REPORTING PERSON AND LOCATION	
5.5	Location	20
	ELINE SCENARIO FIELD C – INDICATORSndicators	
	ELINE SCENARIO FIELD D – TRANSACTIONS Transactions	
	ELINE SCENARIO FIELD E – FROM TYPE / TO TYPEFrom Type / To Type	
BASE 5.9	ELINE SCENARIO FIELD F – MY CLIENT / NOT MY CLIENT AND CONDUCTOR My Client / Not my client	
5.10	Foreign Currency	27
5.11	Conductor	28
5.12	Person Form	28
5.13	Phone	30
5.14	Address	30

User guide to submit suspicious and unusual transaction reports (STR) on the registration and reporting platform of the Financial Intelligence Centre



5.15	Identification	31
5.16	Email	31
5.17	Employer Address and Employer Phone	31
5.18	Save and Cancel Button	32
BASE	ELINE SCENARIO FIELD G – PERSON / ENTITY / ACCOUNT	33
5.19	Party Type	33
5.20	Person My Client	33
5.21	Account My Client	33
5.22	Entity My Client	37
5.24	Goods and Services	39
5.25	Saving / Submitting the report	41



1. Introduction

The Centre is implementing an integrated software solution as its preferred platform for registration, reporting, data collection, analysis, case management and secure communications required for the Centre's daily operational functions and requirements. The new registration and reporting platform is called goAML. A person who carries on a business or is in charge of or manages a business or is employed by a business, including all accountable institutions listed in Schedule 1 to the FIC Act and all reporting institutions listed in Schedule 3 to the FIC Act have an obligation to submit suspicious or unusual transaction reports (STR) to the Centre in terms of section 29 of the FIC Act and must utilise goAML for submitting STR to the Centre.

goAML is accessible by going to the Centre's website, www.fic.gov.za, and selecting the reporting functionality.



2. goAML Web Icons

Icons	Description		
•	Add		
Add	Add the captured detail		
Cancel	Cancel instructs goAML not to capture the detail		
Close	Close		
•	Preview		
4	Print		
O	Refresh		
×	Remove the uploaded document		
Upload	Upload a document		
Save	Save		
Save Report	Save a report		
Submit Report	Submit a report		
Show Attachments x 0	Shows the number of attached documents		
New Reports	Upload XML and web reports		
Drafted Reports	Access drafted and submitted reports		
Submitted Reports	View submitted reports		
Message Board	Access mail messages on goAML		
My goAML	Change password and user details		
Admin	Access statistics		
Logout	Logout of goAML		



3. Suspicious Transaction Report (STR) Baseline Scenario

The below process flow diagram demonstrates the end to end process of uploading a Suspicious Transaction Report (STR). This diagram is given greater detail in the content below. Fields in the flow diagram are labelled A to H.

3.1 Field Definitions

- Report type (A) The type of report (i.e. STR)
- Reporting Person and Location (B)
 - Reporting Person Linked to the logged in user details, this is the person uploading the STR;
 - Location Describes the actual geographical area / branch where the transaction or series
 of transactions occurred. The address of the logged in user, is populated with selected
 report for capturing. The logged in user must edit or delete the address, if the populated
 address is not the actual location of where the transaction (series of transactions) and/or
 unusual/suspicious activity occurred.
- Indicators (C) Refers to the relevant section of the FIC Act in terms of which the report is being made. An indicator in relation to STR means the type of report submission.
- Transactions (D) "Transaction" means a transaction concluded between a client and an accountable institution in accordance with the type of business carried on by that institution.
- From Type / To Type (E) –This indicates from where the funds originated (from), and to where
 the funds were placed (to). Both fields are required to be completed.
- My client / Not my client and Conductor (F) Denotes if the "from/to type" selected are the
 institutions client, or not the institutions client. i.e. The person/entity who paid the cash is not the
 client of the institution, and the person/entity receiving the cash is the client of the institution.
- Person / Entity / Account (G)
 - Person- this refers to a natural person.
 - Note: If a person physically receives or pays cash, "person" is selected
 - Entity- this refers to a legal person. Note that there is a natural person that will always be linked to an entity (i.e. The signatory).
 - Note: If an entity physically receives or pays cash, "entity" is selected.



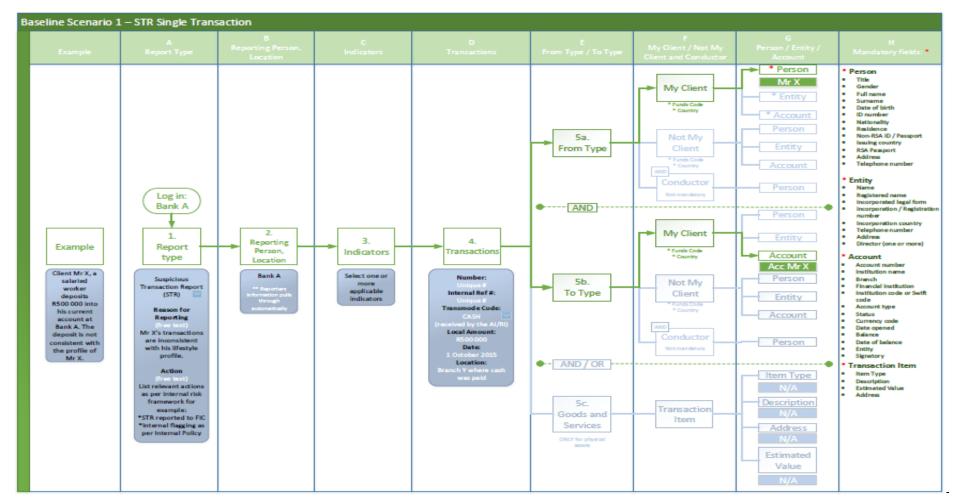
 Account- this refers to an account held with an accountable or reporting institution (e.g. Cheque account held with a bank).

Note: When cash is deposited or withdrawn to/from an account, then "account" will be selected.

- Mandatory Fields (H) this refers to the fields that are compulsory to be completed. The
 information that is required is dependent on the fields selected in field G (i.e. Person / Entity /
 Account).
- Goods and services this information is required to further describe the physical assets that are linked to the funds. This is only compulsory should this be a physical asset (ie. Where there is more to the transaction than just the flow of funds), and is captured as the last step of the report capturing prior to 'saving and submitting' to the Centre. The following information is mandatory when completing this section:
 - Item type if this is a moveable or immovable property within or outside the Republic of South Africa
 - Description brief description of the property involved (eg. Luxury vehicle)
 - Address address where the property can be located
 - Estimated value estimated value of the property at time of report being submitted



3.2 Baseline scenario for submitting a single suspicious transaction report to the Centre with NO goods or services – displaying fields A to H to be completed

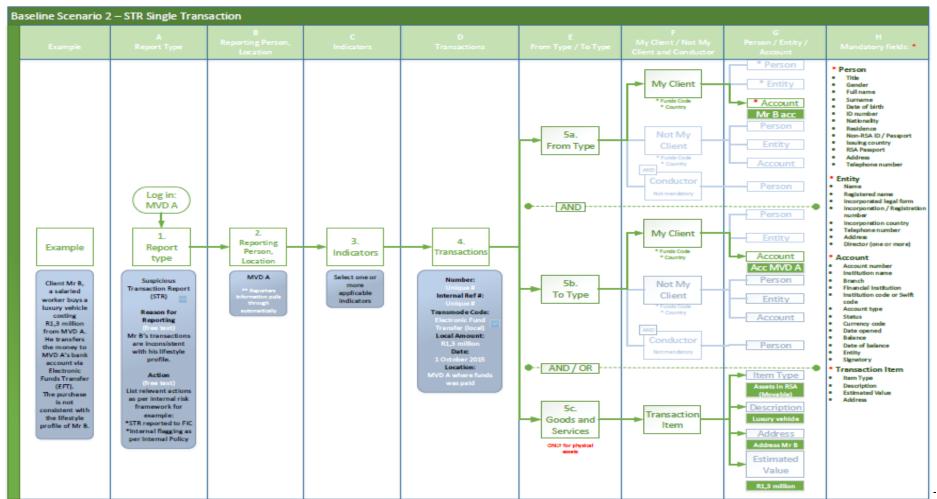


User guide to submit suspicious and unusual transaction reports (STR) on the registration and reporting platform of the Financial Intelligence Centre
- With Effect 25 April 2016 -

Page 10 of 42 version 2.0



3.3 Baseline scenario for submitting a single suspicious transaction report to the Centre WITH goods or services – displaying fields A to H to be completed

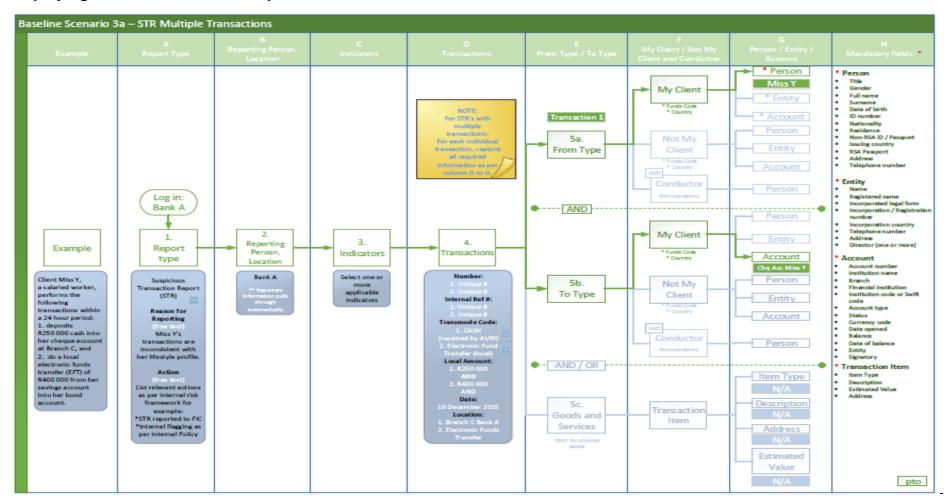


User guide to submit suspicious and unusual transaction reports (51K) on the registration and reporting platform of the Financial intelligence Centre

- With Effect 25 April 2016 -



3.4 Baseline scenario for submitting a multiple suspicious transaction reports to the Centre with NO goods or services – displaying fields A to H to be completed

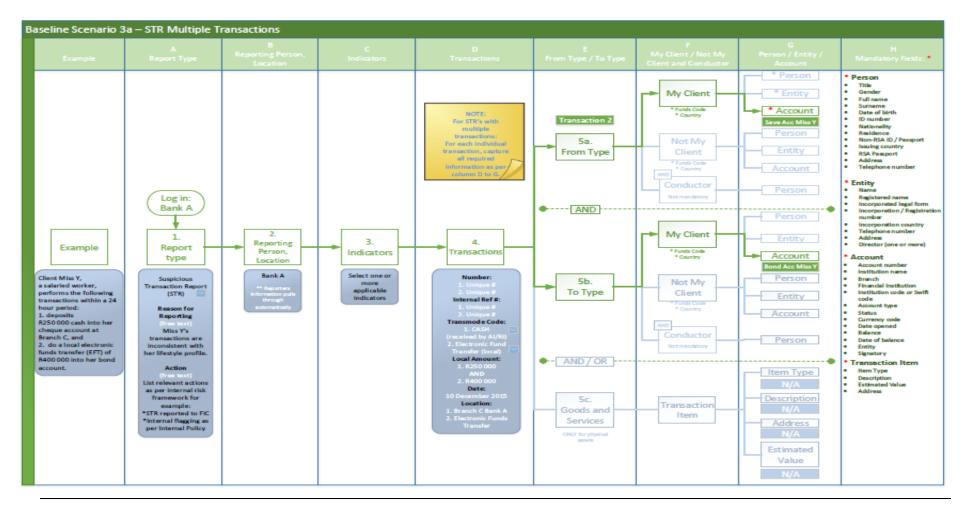


User guide to submit suspicious and unusual transaction reports (STR) on the registration and reporting platform of the Financial Intelligence Centre
- With Effect 25 April 2016 -

Page 12 of 42 version 2.0



3.5 Baseline scenario for submitting a multiple suspicious transaction reports to the Centre with goods or services – displaying fields A to H to be completed



User guide to submit suspicious and unusual transaction reports (STR) on the registration and reporting platform of the Financial Intelligence Centre
- With Effect 25 April 2016 -

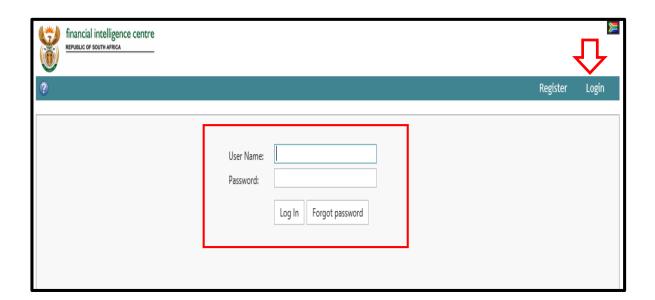
Page 13 of 42 version 2.0



4. Accessing goAML

Accountable and reporting institutions can access the goAML platform by utilising the username and password captured during the registration process. Authentication will always be required before gaining access to goAML.

- Go to the Centre's website, <u>www.fic.gov.za</u>
- Access goAML page by clicking on reporting forms; OR access the link directly by using https://goweb.fic.gov.za/goAMLWeb_PRD/Home
- Click on the Login link
- Enter your user name in the standard format captured during registration.
- Enter your password in the standard format of Case sensitive, Alpha Caps, Alphanumeric, numeric & Char e.g. Test12345@ and click Log In button to proceed.



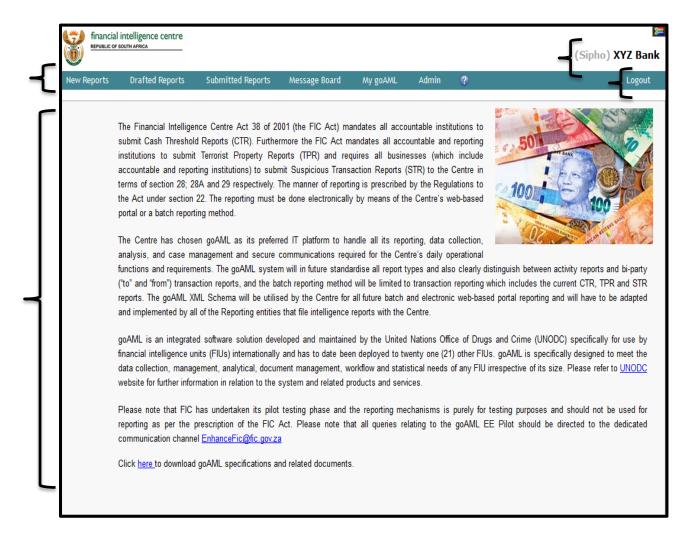
Caution: Remember to keep your username and password safe.



4.1 goAML platform landing page

The landing page has the following visible items

- **Logged in user details** details which user is logged in for which institution (e.g. Sipho from XYZ Bank).
- Menu Bar contains New Reports / Drafted Reports / Submitted Reports / Message Board / MygoAML / Admin / Help / Logout, clicking any of the link item will give a user access to the functionality required (i.e. clicking message board populates the message board).
- Information Bar contains the FIC information with links to download goAML documentation.
- Logout allows you to logout as a user.



- With Effect 25 April 2016 -

Page 15 of 42 version 2.0



5. Capturing a Suspicious Transaction Report

5.1 Select a new Report

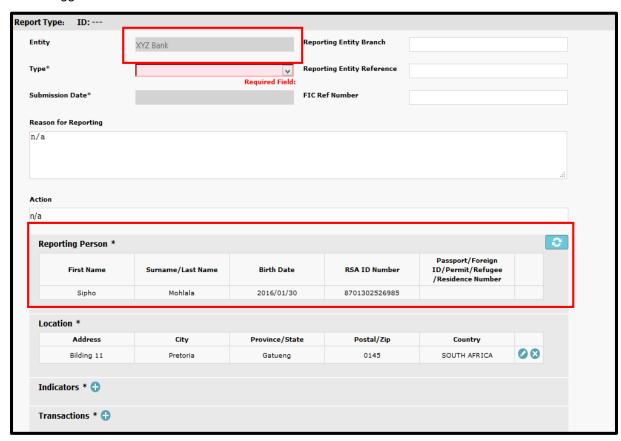
The link for uploading reports is accessible by hovering the mouse pointer on the menu bar;
 New Reports > click Web Reports



Once selected, a general reporting template will be generated.

5.2 Reporting template- overview

The form for creating new reports is loaded and displayed. The form fields **Entity** and **Reporting Person** are automatically completed and cannot be changed. The Reporting Person details are linked to the logged in user details.



User guide to submit suspicious and unusual transaction reports (STR) on the registration and reporting platform of the Financial Intelligence Centre

- With Effect 25 April 2016 -

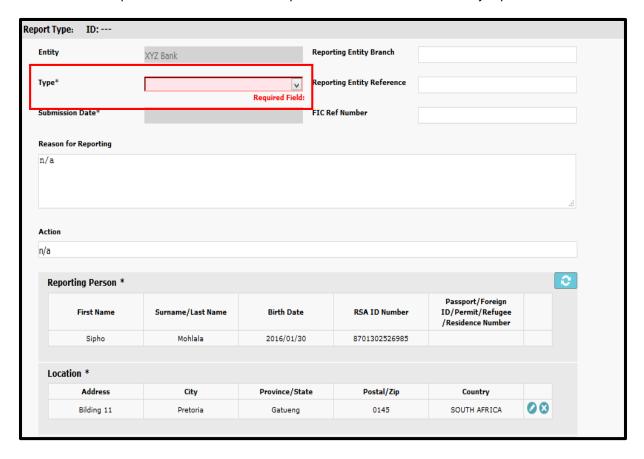
Page 16 of 42 version 2.0



BASELINE SCENARIO FIELD A - REPORT TYPE

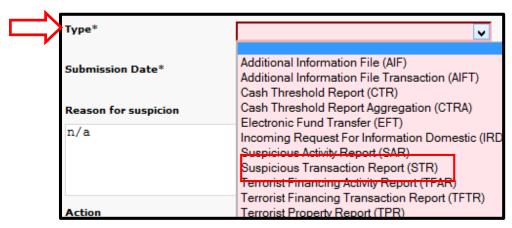
5.3 Select Report Type

The type of report to be submitted is selectable from the Type drop down list, each report will
have unique fields i.e. transactional reports fields will differ from activity report fields



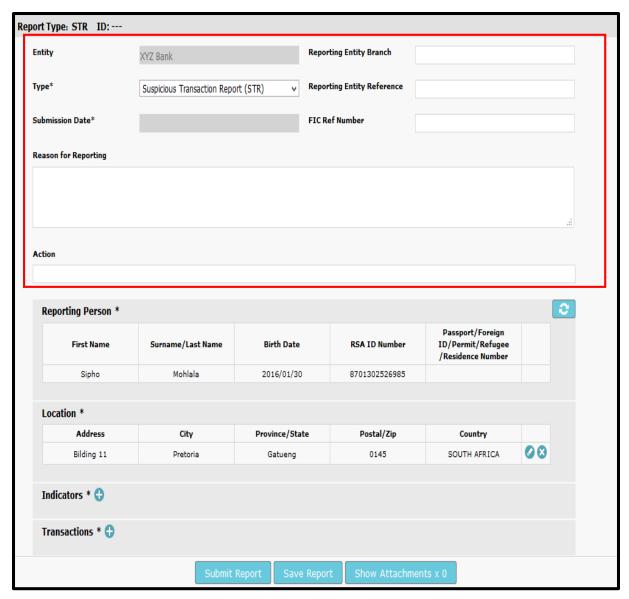


To capture a STR, select from the Type drop down list > select Suspicious Transaction
 Report





Report Type window populates with the following fields:



- Entity Automatically filled in and cannot be changed (Linked to Login ID)
- Type Type of Report (e.g. STR)
- Submission Date Automatically generated once the report is submitted.
- Reason for Reporting (mandatory) -Grounds for suspicion
- Action (mandatory) Action taken (e.g. Reported the activity to Law Enforcement)

- Reporting Entity Branch Branch where the transaction took place (mandatory)
- Reporting Entity Reference Reporting Entity internal transaction reference number
- FIC Ref Number This field is for resubmitting failed / rejected reports and needs to reference the original report number issued by the FIC

User guide to submit suspicious and unusual transaction reports (STR) on the registration and reporting platform of the Financial Intelligence Centre

- With Effect 25 April 2016 -

Page 19 of 42 version 2.0



FIELD BASELINE SCENARIO B - REPORTING PERSON AND LOCATION

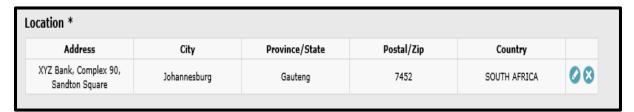
5.4. Reporting Person

 Reporting Person - Full details of the report's reporting person automatically filled in (Linked to Login ID)



5.5 Location

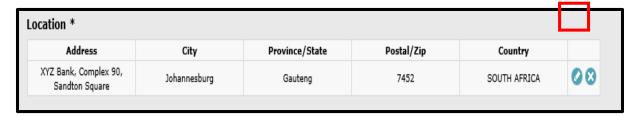
Describes the actual geographical area / branch where the transaction or series of transactions occurred. The address of the logged in user is pre-populated with the address of the registered profile. The logged in user must edit or delete the address if the populated address is not the actual location of where the transaction (series of transactions) activity occurred.





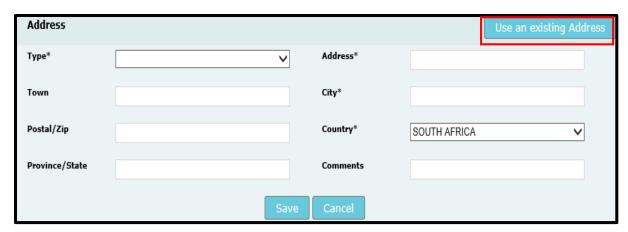
To edit the location

Click the edit icon



Address form populates > Edit the fields

The "Use an existing Address" button is used to populate Address information that was already captured on the web session on goAML



- Type It can be Business, Operational, Private, Public, Unknown
- Town Name of town / district as part of a city
 Postal / Zip The postal code of the city
- Province / State Name of the province
- Address Physical Address details like street name, house number etc.
- City Name of the city
- Country Name of the country
- Comments If any



BASELINE SCENARIO FIELD C - INDICATORS

5.6 Indicators

Indicators are classification for the report. More than one "**Report Indicator**" may be provided. To select the appropriate indicator:

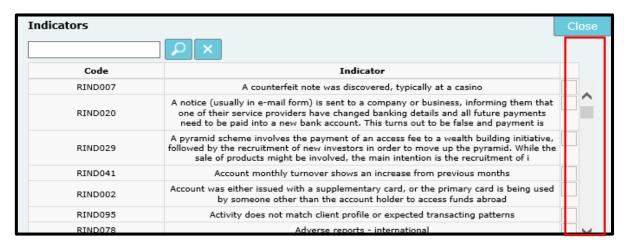
Click Add to select the appropriate indicator for the report



Type in the Indicator Code > click Search Button > select by checking the Indicator > Close.



Or Scroll > select by checking the Indicator > Close.



User guide to submit suspicious and unusual transaction reports (STR) on the registration and reporting platform of the Financial Intelligence Centre

- With Effect 25 April 2016 -



The selected Indicator will be displayed on the form. Click X to delete the searched indicator





Whilst multiple report indicators may be provided, a business rule exists that indicates that a minimum of one report indicator per report must be included.

BASELINE SCENARIO FIELD D - TRANSACTIONS

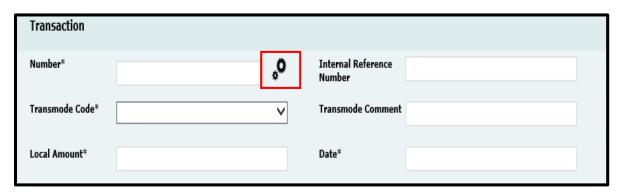
5.7. Transactions

Transactions details are added as follows:

Click Add button to capture transaction details for the report



The Transaction form populates with details of the report to be completed.



- Number* Unique transaction number (e.g. bank transaction will be an Account Number)
 / in an event of no transaction numbers being available, users can generate a unique reference number from the system by clicking the icon
- Transmode Code How the transaction was conducted, select from list (e.g. Cash)
- Local Amount The value of the transaction in local currency (e.g. R35000)

- Internal Reference Number Reporting Entity internal transaction reference number
- Transmode Comment Description if the transmode code is Unknown or Other
- Date Date of transaction (e.g.ccyy/mm/dd)

Please Note: For non-banking institutions there must be a unique transaction number (**Number***) that will enable the institution to identify the relevant transaction and the client number/profile may be used in this instance

User guide to submit suspicious and unusual transaction reports (STR) on the registration and reporting platform of the Financial Intelligence Centre

- With Effect 25 April 2016 -

Page 24 of 42 version 2.0





- Late Deposit This field is applicable in cases
 where the customer drops cash in a box at a
 bank after the bank's working hours. In all such
 cases, the "Value Date" will be different from
 transaction date as the bank will process this
 transaction the next day
- Teller The teller who conducted the transaction. This is only applicable where a transaction is conducted in-branch
- Authorised Person who authorised the transaction
- Location Branch / Location where the transaction took place
- Description List additional information in relation to the late deposit if available



BASELINE SCENARIO FIELD E - FROM TYPE / TO TYPE

5.8 From Type / To Type

Transactional reports on goAML are structured as bi-party transactions with a **From** and **To** part to every transaction. A transaction report will always have a From (Payee) and To (Receiver) side which will need to be completed by the reporter.-



One of the part of the **From Type** and **To Type** have to be "my client" or "not my client". A client whether "my client" or "not my client" will always be, either an account, entity and/or person - a variation of the three and may be one or multiple. The mandatory information fields that need to be completed will differ as per the FIC requirements (e.g. if it's "my client", first name, surname, ID and date of birth are mandatory whilst the "not my client" only name or surname will be mandatory).

BASELINE SCENARIO FIELD F - MY CLIENT / NOT MY CLIENT AND CONDUCTOR

5.9 My Client / Not my client

The difference would be the part of the transaction where it is "My Client" versus just a "Not My Client" as it will influence how many of the fields will be mandatory.

• Click the > My Client radio button > The From My Client button displays > click the Add button



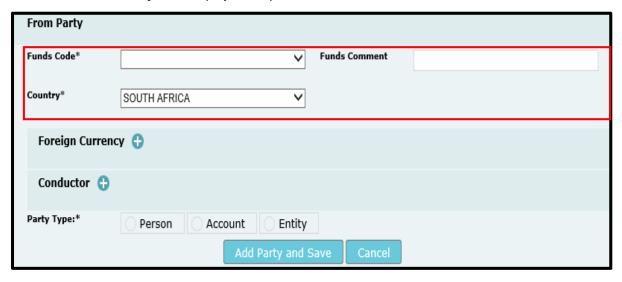
User guide to submit suspicious and unusual transaction reports (STR) on the registration and reporting platform of the Financial Intelligence Centre

- With Effect 25 April 2016 -

Page 26 of 42 version 2.0



The From Party form displays, complete the details



- Funds Code Type of funds used in initiating transaction (e.g. Cash)
- Country Country where transaction was initiated
- Funds Comment Description, if funds code is Unknown

5.10 Foreign Currency

Clicking the Foreign Currency add button generates a form with mandatory Currency Code, Amount and Exchange Rate fields



- Currency Code Describes the currency for the transaction
- Amount Transaction amount in foreign currency
- Exchange Rate Exchange rate used for transaction (i.e. numeric value)

Page 27 of 42 version 2.0



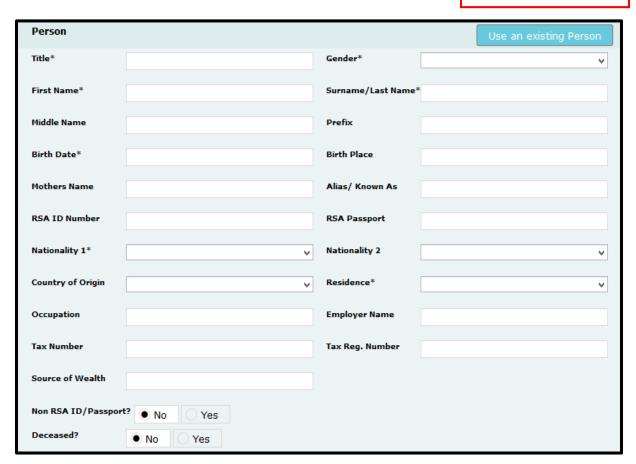
5.11 Conductor

A Conductor is a person carrying out the transaction and is an optional field. Clicking the **Conductor** add button generates a **Person** form



5.12 Person Form

The below screen will generate once the conductor has been selected. "Use an existing Person" button is used to populate Person information that was already captured on the web session on goAML.





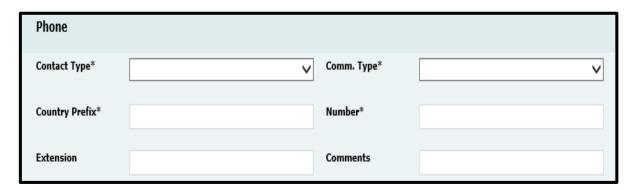
- Clicking the Yes radio button populates additional fields to be completed
- Title e.g. Ms / Dr / Mrs
- First Name First name of the person
- Middle Name Middle name of the person
- Birth Date –Date of birth/ can be typed in / from calendar in ccyy/mm/dd format
- Mothers Name Maiden Name
- RSA ID No –13 digit South African ID Number This is a mandatory field in the event that it is my client and said client has a SA ID Number (e.g. 7404080408069)
- Nationality 1 The status of belonging to a particular nation, whether by birth or naturalisation
- Country of Origin The country in which a person is deemed to have originated
- Occupation Job title of the person

- Gender Male / Female
- Surname / Last Name Surname of the reported person
- Prefix Any name prefix (e.g. titles of nobility -Duke)
- Birth Place Place of birth
- Alias / Known As Also known as name or other aliases
- RSA Passport South African passport number
- Nationality 2 The status of belonging to a particular nation, whether by birth or naturalisation
- Residence Select the current residence country of the person
- Employer Name Record of Employer details
- Tax Number The tax number of the individual whose details are being captured
- Tax Reg. Number The person's tax registration number issued by tax authorities
- Source of Wealth The source of wealth / income of the individual whose details are being captured
- Non RSA ID / Passport? No / Yes
- Foreign Passport / Foreign ID / Permit / Refugee / Residence Number If reported person is not a South African citizen/resident (thus no SA ID Number and/or SA Passport Number) and thus the Non South African Number/Document field is "Yes", the completion of a Passport / Foreign ID / Permit/Refugee / Residence number is mandatory"
- Issuing Country The country which issued the respective Foreign Passport / Foreign ID / Permit / Refugee / Residence Number
- Deceased No / Yes, if the person has passed away
- Date of Death If the person has passed away, then the date of passing is required in ccyy/mm/dd format

Page 29 of 42 version 2.0



5.13 Phone



- Contact Type It can be Business,
 Operational, Private, Public, Unknown
- Country Prefix e.g. 27
- Extension Numeric

- Comm. Type It can be Landline, Mobile, Satellite
- Number Numeric, digits (e.g. 0128012556)
- Comments if any

5.14 Address



- Town Name of Town / district as part of a city
- Postal / Zip the postal code of the city (e.g. 0122)
- Province / State name of the province (e.g. Gauteng)
- City Name of the city
- Country name of the country
- · Comments if any

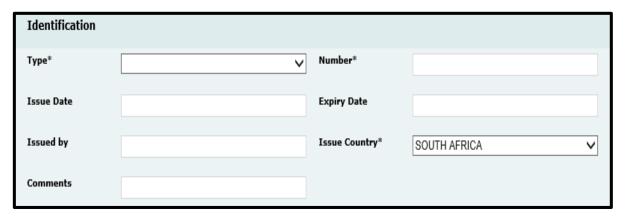
User guide to submit suspicious and unusual transaction reports (STR) on the registration and reporting platform of the Financial Intelligence Centre

- With Effect 25 April 2016 -

Page 30 of 42



5.15 Identification



- Type It can be Travel Document / Permit / Passport etc.
- Issue Date Identification document issue date
- Issued by Name of authority that issued the document (e.g. Department of Home Affairs)
- Comments If any

- Number alphanumeric value of the ID document (e.g. AT08154711 or 8104226008085)
- Expiry Date The last date of validity of the Identification document
- Issue Country Country where the document was issued

5.16 Email



Email – person's email address

5.17 Employer Address and Employer Phone

Clicking the **Employer Address / Phone** add button generates person's employers form to be completed



User guide to submit suspicious and unusual transaction reports (STR) on the registration and reporting platform of the Financial Intelligence Centre

- With Effect 25 April 2016 -

Page 31 of 42 version 2.0



5.18 Save and Cancel Button



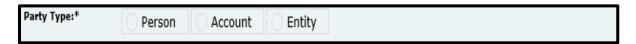
- Save The save button adds information to the person's form
- Cancel To cancel or discard the current screen information



BASELINE SCENARIO FIELD G - PERSON / ENTITY / ACCOUNT

5.19 Party Type

The Party Type refers to the source and destination party in relation to the STR being reported to the Centre. This means the party to The Party Type can be either a **Person**, **Account** or **Entity**, and/or a combination of these. This means the source can be either a **Person**, **Account** or **Entity**. This also means that the destination can be either a **Person**, **Account or Entity**.



5.20 Person My Client



Where the client of the accountable or reporting institution is a person. Clicking the **Person** radio button will generates **Person My Client** field > click the **Add** button to generate the form, refer to **paragraph 5.12 Person form**.

5.21 Account My Client

Clicking the **Account** radio button generates **Account My Client field** > click the **Add** button to generate the form



- Whenever the involved Account / Person / Entity is the client of the reporting entity, more
 details may be demanded on the client, and the reporting entity must have the information as
 part of the adherence to the client identification and verification requirements of the FIC Act.
- In the instance of an account of a minor both the details of the minor and guardian authorised to transact on his/her behalf should be captured

User guide to submit suspicious and unusual transaction reports (STR) on the registration and reporting platform of the Financial Intelligence Centre

- With Effect 25 April 2016 -

Page 33 of 42 version 2.0



The "Use an existing Account" button is used to populate Account information that was already captured on the web session on goAML.



- Account Number Account number (for Non-Banking institution the account number can refer to the client number/profile number assigned by the institution)
- Institution Registration Name Name of the institution where account is held
- Name The type of account that is being referred to- i.e. Trust account, savings account or client account etc.
- Branch Code Branch where the account is held



- Non Banking Institution? Yes (if institution is <u>not</u> a bank)
- Code or SWIFT? Choose Institution Code
- Institution Code Institution code is the code issued to Reporting Entity by FIC



- Non Banking Institution? –No (If institution is a bank)
- Code or SWIFT? Choose SWIFT Code
- SWIFT SWIFT code according to ISO 9362 (e.g. XYZ001)

User guide to submit suspicious and unusual transaction reports (STR) on the registration and reporting platform of the Financial Intelligence Centre

- With Effect 25 April 2016 -

Page 34 of 42 version 2.0



Account Type*	~	Status Code*	
Currency Code*		Beneficiary	
IBAN		Client Number	
Opened*		Closed	
Balance*		Date of Balance*	

- Account Type Type of account (e.g. Trust or Client)
- Currency Code Currency the account is kept in
- IBAN (International Bank Account Number) is a number attached to all accounts, the
 code identifies the country the account
 belongs to, the account holder's bank and
 the account number.
- Opened Date account opened in ccyy/mm/dd format
- Balance The account balance at the time of reporting

- Status Code Account status when transaction was initiated (e.g. Active / Closed)
- Beneficiary Ultimate beneficiary of the account (Should be completed where the beneficiary is different from signatory)
- Client Number Client number
- Closed Date account closed in ccyy/mm/dd format
- Date of Balance The date of account balance in ccyy/mm/dd format

Please Note: When a branch / business unit / franchise is reporting an account which belongs to a group / head office or other registered reporting entity on goAML- the relevant goAML Org ID of said group/head office / reporting entity must be listed to ensure that bucket / ledger / suspense accounts are reported properly



Clicking the **Entity** add button generates the **Entity** form, the form is used to complete the details of the business entity owning the account, for **Entity** form refer to **5.22 Entity My Client.**

User guide to submit suspicious and unusual transaction reports (STR) on the registration and reporting platform of the Financial Intelligence Centre

- With Effect 25 April 2016 -

Page 35 of 42 version 2.0





Clicking the **Signatory (ies)** add button generates the **Signatory (ies)** form, the form is used to complete the details of the **Person(s)** with access to the account



- Is Primary Identifies the primary account holder. Only one signatory may be marked as primary account holder
- Role The role of the signatory (e.g. Beneficiary, Account Holder)
- Person populates Person form refer paragraph 5.12



- Beneficiary Comments Any special remark on the beneficiary
- · Comments If any

Please Note: In instances where an account has multiple signatories, all of the signatory details need to be captured.

Save and Cancel Button



- Save The save button adds information to the Account form
- Cancel To cancel or discard the current screen information.

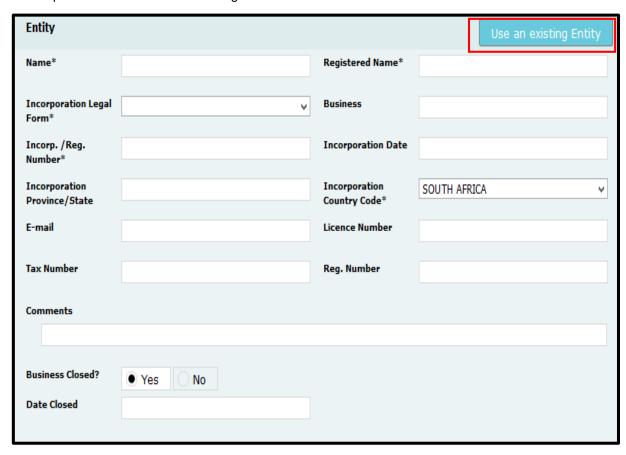


5.22 Entity My Client

Clicking the **Entity** radio button generates **Entity My Client** field > click the **Add** button to generate the form



 The "Use an existing Entity" button is used to populate Entity information that was already captured on the web session on goAML



- Name Name of the entity
- Incorporation Legal Form The legal form of the entity
- Incorporation Number The registration number of the entity / company in the relevant authority (e.g. Chamber of Commerce/ CIPC etc.)
- Trading As The trading name of the entity
- · Business Business area of the entity.
- Incorporation Date Incorporation registration date in ccyy/mm/dd format
- Incorporation Country Code Incorporation registration country code, select from a list

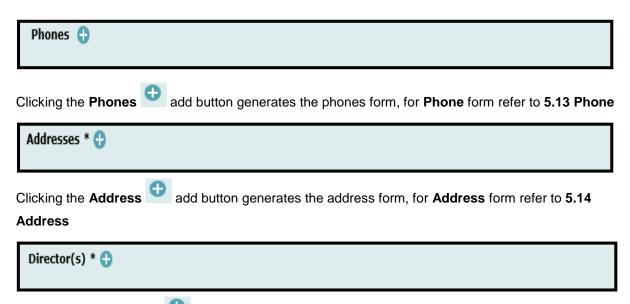
User guide to submit suspicious and unusual transaction reports (STR) on the registration and reporting platform of the Financial Intelligence Centre

- With Effect 25 April 2016 -

Page 37 of 42 version 2.0



- Incorporation State / Province Name of the province
- E-mail Entity email address
- Tax Number The entity tax number
- Comments If any
- Business Closed? Yes / No
- Date Closed If entity is closed, specify the date of closure in ccyy/mm/dd format
- Licence Number License Number issued by the applicable supervisory body as per schedule 2 of the FIC Act
- Reg. Number Registration Number provided to the tax authority and also extend to include relevant licensing or supervisory registration / trading number provided to the institution



Clicking the **Director(s)** add button generates the Person (s) form, complete the details of the individual authorised as directories, for **Person** form refer to **5.12 Persons**

5.23 To Type

To Type fields are similar to the From Type fields therefore the fields will not be discussed further



User guide to submit suspicious and unusual transaction reports (STR) on the registration and reporting platform of the Financial Intelligence Centre

- With Effect 25 April 2016 -

Page 38 of 42 version 2.0

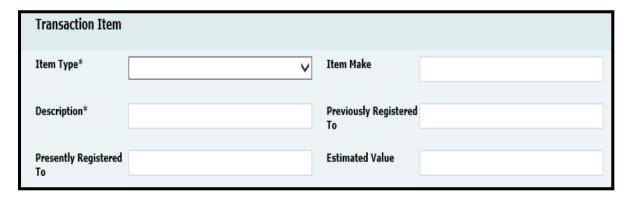


5.24 Goods and Services

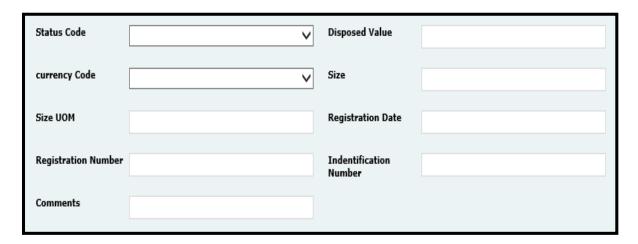
Clicking the Goods and Services Add button generates Transaction form



The Transaction form is used to capture the transaction item details



- Item Type The type of item (e.g. Vehicle)
- Description Description of the item (e.g. Luxury Car)
- Presently Registered To Name of current owner
- Item Make Item maker (e.g. if the item is a car - BMW)
- Previously Registered To Name of previous owner
- Estimated Value Estimated value of the item





- Status Code Stats code (e.g. Bought, Hired)
- Currency Code Used to report service conducted in foreign currency
- Size UOM Unit of measurement (e.g. square meters)
- Registration Number Official registration number (e.g. Car VIN Number)
- Comments If Any

- Disposed Value Eeffective value for property transfer (e.g. R500 000.00)
- Size Size of the property
- Registration Date Official registration date in ccyy/mm/dd format
- Identification Number Any number that can identify the item (e.g. Car Plate Number)



Clicking the Address add button generates the address form, for Address form refer to 5.13

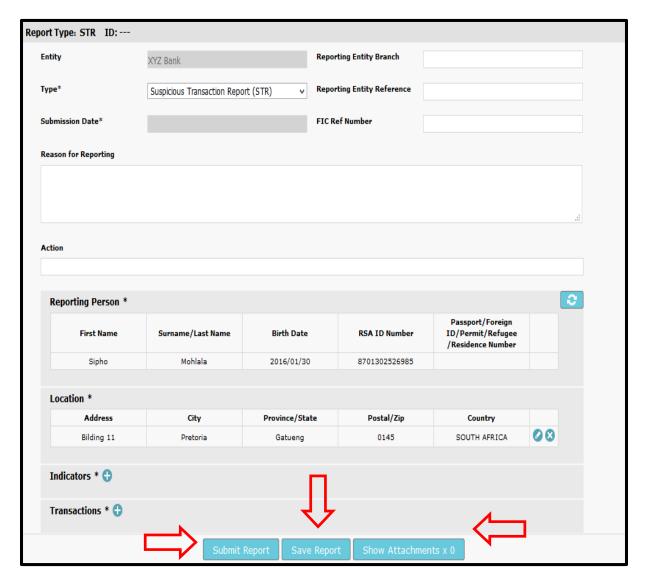
Address



• Status Comments - If any



5.25 Saving / Submitting the report



Submit Report - STR reports can be submitted using the Submit Report Button.

Save Report - Save the STR reports for editing later.

Show Attachments x 0 – documents can only be attached after saving the report, this button must be used to attach documents such as identification document (ID), proof of address, deposit slips, multimedia files and client information

Please Note: All transaction information must be captured as structured information per report type and <u>no</u> activity and/or transactional information that should have been captured as structured data may be attached to the report.

User guide to submit suspicious and unusual transaction reports (STR) on the registration and reporting platform of the Financial Intelligence Centre

- With Effect 25 April 2016 -

Page 41 of 42 version 2.0



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