



# Central Depository Services (India) Limited

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## COMMUNIQUÉ TO DEPOSITORY PARTICIPANTS

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**CDSL/OPS/DP/POLCY/2019/427**

**August 27, 2019**

### **Revised guidelines by FIU-IND regarding Model Template for STR (GoS part) and guidelines for filing STRs**

DPs are advised to refer communique 692 dated December 28, 2018 enclosing Model Template for STR (GoS part) and guidelines for filing STRs issued by Financial Intelligence Unit – India (FIU-IND) vide its Office Memorandum no. 9-11/2018/AV.I/FIU-IND dated December 12, 2018 (Refer – Annexure-I).

Financial Intelligence Unit – India (FIU-IND) has issued revised guidelines for point no. 10 of aforementioned Office Memorandum - vide its Office Memorandum no. 9-11/2018/AV1/FIU-IND dated July 18, 2019 (Refer – Annexure-II).

DPs are advised to comply with the same.

Queries regarding this communique may be addressed to CDSL – Helpdesk: on telephone numbers (022) 2305-8624, 2305-8639, 2305-8642, 2305-8663, 2305-8640, 2300-2041 or 2300-2033. Emails may be sent to: [helpdesk@cdslindia.com](mailto:helpdesk@cdslindia.com).

**Vice President – Audit, Inspection & Compliance**

**F.No. 9-11/2018/AV.I/FIU-IND**  
Government of India  
Ministry of Finance  
Department of Revenue  
Financial Intelligence Unit-India

6<sup>th</sup> Floor, Hotel Samrat  
Kautilya Marg, Chanakya Puri  
New Delhi 110021  
12<sup>th</sup> December, 2018

To  
All Reporting Entities

**Subject: Model Template for STRs (GoS part) and Guidelines for filing STRs**

Sir/Madam,

Reporting Entities (REs) file Suspicious Transaction Reports (STRs) with FIU-IND as required under the PMLA. While a reporting format for online filing of STRs exists, there is none for the detailed information given by the REs in Grounds of Suspicion (GoS) part. At times, REs have been asked to give all relevant information about the account(s) and account holder(s) to make the STRs meaningful to LEAs. However, the REs still prepare this part as per their own individual understanding.

On the basis of feedback received from the LEAs, the following points have emerged which the REs may note while preparing STRs:

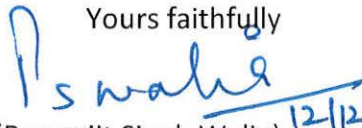
1. In case the account holder is not found staying at the address provided at the time of account opening, the bank may give the alternate address the account holder is residing at, if it is available with the RE.
2. Cases where structuring of cash or rotation of funds is involved using several accounts, even in the same bank, only one STR should be filed, giving details of all accounts rather than separate STRs for each account as is done by many REs. Such clustering of related accounts is suggested for STRs only and not for other Reports.

3. Where funds are coming or going to other banks, details of source / destination should be provided in the STRs.
4. When STR is filed on the basis of enquiry of LEA, address of the enquiring office should be provided to enable the LEA to link up the STR with that particular case.
5. When filing STR on the adverse media report or LEA enquiry, the RE should also conduct proper due diligence to get fuller details before STR is filed.
6. Repeated STRs for each and every subsequent transaction of the reported entity based on adverse media report should be avoided, if no additional analysis is done or no additional ground of suspicion is noticed.
7. Sometimes single line GoS is given in STR without any transaction history, suspicion etc. This is to be avoided. Such STRs would not be accepted.
8. At times, the STRs are filed much later after the event/transaction which triggered it. It may be ensured that STRs are filed in time.
9. The "suspicion due to" viz proceeds of crime, complex transaction, no economic rationale, financing of terrorism must be mandatorily and correctly indicated at the time of filing STR.
10. The amount of cash deposit, cash withdrawal, credit and debit in the current FY which is required to be furnished in the transaction file of the STR must be mandatorily and correctly furnished. Further, the amounts so reported in the transaction file should exactly match with amounts reported under the same heads under "Transaction Summary" head of the model template for filling GoS.
11. Care must be taken to ensure that values such as NIL, NA, XXX etc should not be entered into any of the fields in the individual and legal person file at the time of reporting related persons, entities, accounts, addresses and phone numbers. In case any information required to be filled is not available with the RE, then that field should be **LEFT BLANK**.

12. If PAN of reported person/ entity is available, then the same should be mandatorily reported or it shall be construed that PAN is not available with the RE.
13. Alert Indicators for triggering the STR should be mandatorily reported
14. RE must check the status of all reports filed regularly and where the report (s) has been rejected, RE must file a revised report within 5 working days from date of rejection of report along with communicating details of such refiling separately by email addressed to FIU Helpdesk.
15. Apart from the above points, for filling up Ground of Suspicion part of the STRs a **model template** is enclosed herewith. All REs are advised to adhere to it. If information on a point is not available with the RE, it must be **LEFT BLANK**.

All REs are advised to strictly adhere to the above mentioned guidelines latest with effect from December 17, 2018. It may also be noted that if the guidelines are not adhered to, then the same shall be construed as violation of obligation of the RE under PMLA to furnish correct reports and the RE would be consequently liable for penalty u/s 13 of PMLA.

This issues with the approval of Director, FIU-IND.

Yours faithfully  
  
(Paramjit Singh Walia) 12/12/2018  
Deputy Director

**MODEL TEMPLATE FOR STR REPORTING (GOS PART)**

**CUSTOMER KYC**

1. **Full name and address of the account holder (including the company):** Full name and address as appearing in the OVD obtained for the latest KYC
2. **Date of Birth (for individual)/Date of incorporation for the company):** To be given in DDMMYYYY format
3. **PAN No.:** 10 Character long PAN Number must be given, if available with the RE, else should be LEFT BLANK. Nothing other than PAN should be filled. (avoid filling with dummy characters as it would be violation of law and liable for penalty U/s 13 of PMLA)
4. **Passport No.:** It is to be given if available with the RE.
5. **Other Identification documents:** Details of other ID documents (Number and issuing office) may be given
6. **IEC Code:** To be given in all cases where the a/c holders deal in EXIM business
7. **GSTIN:** To be given in cases where account holder is trader or service provider
8. **Mobile Number/Landline No.:** To be given in full with STD code
9. **Other facilities availed:** Details may be given of other facilities like locker, FDs, loans etc.
10. **Risk Category:** Assigned by the RE should be given here
11. **Name of the authorised signing authorities:** Name of the concerned persons should be given
12. **KYC compliance status:** Has KYC been done?
13. **Date of last KYC updation:** Should be given in DDMMYYYY format

**CUSTOMER PROFILE**

14. **Profile/Nature of business:** Should give the full information (e.g. 'Trading in food grains' , 'Trading in Vegetable' ie., complete description instead of simply 'Trading')
15. **Annual Income as declared in KYC:** (in Rs lakhs)
16. **Annual Turnover of Business as declared in KYC:** (in Rs lakhs)
17. **Beneficial owner(s) as determined under Rule 9(3) of PMLA Rules:**

**ACCOUNT DETAILS**

18. **Bank and Branch details:** Branch details are to be given (I.e. XXX Bank, MG Road, Bengaluru 560001)
19. **Bank Account No.:** Account No in full to be given
20. **Bank Account Type:** Saving/Current/Loan etc.
21. **Bank A/c opened on :** Should be given in DDMMYYYY
22. **Bank Account Status:** whether active or dormant or closed

**TRANSACTION SUMMARY**

23. **Quantum of transactions for the current year:** Debit side Rs. XX lakhs (in cash Rs. XX lakhs)) and Credit side Rs. XX lakhs (in cash Rs. XX lakhs) ( Restrict to current year only)
24. **Quantum of transactions for previous years:** For the last 3 years - Debit side Rs. XX lakhs (in cash Rs. XX lakhs)) and Credit side Rs. XX lakhs (in cash Rs. XX lakhs) individual Year wise.
25. **Balance in account on date of filing STR:**

**HISTORY**

26. **Details of earlier STRs filed on the account or account holders/related persons:** Batch ID, S. No, reported a/c number and name of the a/c holder may also be given in respect of the previously filed STRs, if any.

**REASONS FOR SUSPICION**

27. **Reactive STRs:** If the STR is filed on the basis of an inquiry from an LEA (including alerts issued from FIU-IND office), full details of the query letter (letter no and date), issuing office and signing authority may be stated. It may also be added if the information sought for has been given.
28. **Adverse media report:** Link details to the media report may be given. In such cases, the RE should also do the EDD and findings thereof should be included in GoS
29. **Grounds of Suspicion:** RE must explain clearly the reason why a particular transaction or set of transactions were found suspicious. The GoS may also include transaction pattern, if the RE can find one. The RE should also state specifically as to what appears to be the suspicion for raising the STR – Tax evasion, Trade Based Money Laundering (TBML), Terror financing (TF), Laundering of money earned from criminal activities, anti-national activities, corruption, frauds, forgery, perfect match with watchlists etc.
30. **Details of Investigation:** The RE must give complete details of the suspected transaction(s). While giving this information, details of creditors / debtors (name, bank and a/c number) may also be given, if available, with the RE.

**Note:** If the word limit for the GoS field exceeds the current limit, then the RE must break up the information to be provided as detailed above in two parts i.e. information as per Sl. No. 1 to 26 can be given in the GoS part and remaining information as per Sl. No. 27 to 30 can be given in the “Details of Investigation” part of the STR.

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**9-11/2018/AV1/FIU-IND**  
**Ministry of Finance**  
**Department of Revenue**  
**Financial Intelligence Unit – India**

**6<sup>th</sup> floor, Hotel Samrat,**  
**Kautilya Marg, Chanakyapuri,**  
**New Delhi 110021**  
**July 18, 2019**

To,  
All Reporting Entities

**Subject: Model Template for STRs (GoS part) and Guidelines for filing STRs - Clarification**

Sir / Madam,

Reporting Entities (REs) may refer to the 'Model Template for STRs (GoS part) and Guidelines for filing STRs' dated December 12, 2018 issued by FIU-IND. Point no. 10 (ref. page no. 2) of the said guidelines stands revised and may now be read as under:

'10. REs may refer to the Reporting Format Guide while populating the data in the ARF (account based) text files or TRF (transaction based) text files (as the case may be):

**10.1** The steps in preparation of data files of ARF format (as already mentioned in the Reporting Format Guide) are re-iterated below:

- i. The records containing details of suspicious transactions to be reported are extracted in Transaction Data File (ARFTRN.txt).
- ii. The records containing details of accounts with the suspicious transactions are extracted in Accounts Data File (ARFACC.txt).
- iii. If the account is for Individuals, the records containing details of Individuals who are account holders are extracted in Individual Data File (ARFINP.txt). The Relation Flag should be set to "A".
- iv. If the account is for a Legal Person/Entity, the records containing details of Legal Persons/Entities who are account holders are extracted in Legal Persons/Entities Data File (ARFLPE.txt). The Relation Flag should be set to "A".
- v. Similarly for other Individuals/Legal entities related to the account in different capacities, the records containing the details are appended to Individual data file (ARFINP.txt) or Legal persons/Entities data file (ARFLPE.txt) as the case may be. The relation flag may be set as per section 11.1.14.1 of the Reporting Format Guide.
- vi. The records containing details of branches which have reported suspicious transactions are extracted in Branch Data File (ARFBRC.txt).
- vii. The grounds of suspicion and report level details are entered in Report file. (ARFRPT.txt).

**10.2** The steps in preparation of data files of TRF format (as already mentioned in the Reporting Format Guide) are re-iterated below:

- i. The records containing details of suspicious transactions have to be extracted in Transaction Data File (TRFTRN.txt). If one or more related individuals/entities have undertaken multiple transactions, all such transactions should be included in one STR.
- ii. The records containing details of branches/locations related to the transactions have to be extracted in Branch Data File (TRFBRC.txt). The relation flag has to be set accordingly. If multiple branches/locations are related to the suspicious transactions, details of such all such branches/locations should be included in the STR.
- iii. If other Institutions are related to the transactions (Payment Instrument Institution, Account Institution and Related Institution) and their information is available with the reporting entity, their details have to be extracted in Branch Data File (TRFBRC.txt). The relation flag has to be set accordingly.
- iv. If details of payment instrument(s)/card(s) related to the transactions are available, their details have to be extracted in Payment Instrument File (TRFPIN.txt).
- v. If details of individual(s) related to the transactions are available, the records containing details of individuals have to be extracted in Individual Data File (TRFINP.txt). The relation flag has to be set accordingly.
- vi. If details of Legal Person/Entity(s) related to the transactions are available, the records containing details of Legal Person/Entity have to be extracted in Legal Person/Entity Data File (TRFLPE.txt). The relation flag has to be set accordingly.
- vii. If the details of Legal Person/Entity have been extracted to Legal Person/Entity File (TRFLPE.txt), the records containing details of Authorised Signatories or Directors/Partner/Members etc. of Legal Persons/Entities may be appended to Individual Data File (TRFINP.txt).
- viii. The grounds of suspicion and report level details have to be captured in the Report file (TRFRPT.txt).'

*For further details, REs are advised to refer to the Reporting Format Guide available under the Downloads tab of the FIU-IND official website, at the following weblink:  
[https://fiuindia.gov.in/files/downloads/Filing\\_Information.html#](https://fiuindia.gov.in/files/downloads/Filing_Information.html#)*

**2.** It is also re-iterated that Prevention of Money Laundering Act (PMLA) and Prevention of Money Laundering (Maintenance of Records) Rules (PML Rules) require that the Principal Officer shall furnish the information as prescribed by law on the basis of information available with the reporting entity. This includes information to be furnished while reporting Suspicious Transaction Reports (STRs). It is imperative to note that STR is a critical report under PMLA and PML Rules and therefore its GoS column must clearly reflect the Customer Due Diligence (CDD) / Enhanced Due Diligence (EDD) conducted by the RE. Filing STRs by mentioning only the alert indicator / Red Flag Indicator (RFI) in the GoS column suggests lack of application of mind while reporting STRs and thus must be avoided. Further, reporting invalid values in PAN column (viz. XXXXX1234X, etc.) of the individual / legal entity fields, reporting same PAN number for different individuals / legal entities in a STR, etc. leads to creation of faulty linkages, thus corrupting FIU-IND's database and therefore must be avoided.

3. In this context, it is again being emphasized that complete and correct information needs to be furnished in each and every STR filed by the RE. Principal Officers (POs) must exercise utmost care to ensure that qualitative reports are filed with FIU-IND. POs may ensure that all individuals / legal entities which are linked in a given STR are reported correctly and that multiple STRs are not filed on more than one linked individual / legal entity relating to the same STR case. POs may also ensure that instances such as reporting incorrect details in individual and / or legal entity fields (viz. reporting incorrect PAN number such as XXXX1234X, etc.), reporting the same PAN number for different individuals / legal entities reported in the same STR case, etc. do not recur. POs need to carefully scrutinise each and every STR being reported to FIU-IND to ensure that qualitative GoS is reported in each STR and also that the guidelines dated December 12, 2018 on STRs (Model template) issued by FIU-IND are adhered to. POs instead of simply filling the data points in the GoS column may write the GoS of each STR in the form of a narration with complete and correct details. POs must also ensure that values such as XXXX, NA etc. are not filled in the STR reporting format (unless specifically allowed as per the Reporting Format Guide). POs are also advised to ensure that human intelligence is applied while filing a STR and sole reliance on machine intelligence may be avoided.

4. These instructions are without prejudice to any other proceedings and/or action that may be initiated /taken by FIU-IND for failures in reporting.

5. This issues with the approval of the Director.

Yours faithfully,



**Shailesh Thakur**  
**(Additional Director)**