



RESERVE BANK OF INDIA
Foreign Exchange Department
Central Office
Mumbai - 400 001

RBI/2009-10/235

November 27, 2009

A.P. (DIR Series) Circular No.17

A.P. (FL/RL Series) Circular No.04

To,

All Authorized Persons

Madam/ Dear Sir,

Know Your Customer (KYC) norms/Anti-Money Laundering (AML) standards/Combating the Financing of Terrorism (CFT)/Obligation of Authorised Persons under Prevention of Money Laundering Act, (PMLA), 2002, as amended by Prevention of Money Laundering (Amendment) Act, 2009- Money changing activities

Attention of Authorized persons is invited to the Anti-Money Laundering Guidelines governing money changing transactions, issued vide [A.P. \(DIR Series\) Circular No. 18 \[A.P. \(FL Series\) Circular No. 01\]](#) dated December 02, 2005, [A.P. \(DIR Series\) Circular No. 39 \[A.P. \(FL Series\) Circular No. 2\]](#) dated June 26, 2006, [A.P. \(DIR Series\) Circular No. 14 \[A.P. \(FL Series\) Circular No. 1\]](#) dated October 17, 2007 and [A.P. \(DIR Series\) Circular No. 15 \[A.P. \(FL Series\) Circular No. 2\]](#) dated November 19, 2009.

2. In terms of Prevention of Money Laundering Act, (PMLA), 2002, as amended by Prevention of Money Laundering (Amendment) Act, 2009, all Authorized Persons, authorized under Section 10(1) of FEMA, 1999 have been brought under the purview of PMLA, 2002. Therefore, the existing Know Your Customer (KYC) norms/ Anti-Money Launderings (AML) standards/ Combating the Financing of Terrorism (CFT) for money changing activities have been revisited in the context of the Financial Action Task Force (FATF) Recommendations on Anti Money Laundering (AML) standards and on Combating the Financing of Terrorism (CFT). Detailed instructions on Know Your Customer (KYC) norms/ Anti-Money Launderings (AML) standards/ Combating the Financing of Terrorism (CFT) for money changing activities have been revised.

3. Accordingly, revised guidelines on obligation of Authorised Persons under PMLA, 2002 as amended by Prevention of Money Laundering

(Amendment) Act, 2009 in respect of money changing activities are given in (F-Part-I) annexed. All Authorised Persons should, therefore, have in place a revised policy framework on 'Know Your Customer' and Anti-Money Laundering and Combating the Financing of Terrorism measures with the approval of their Board.

4. These guidelines are also applicable mutatis mutandis to all agents / franchisees of Authorised Persons and it will be the sole responsibility of the franchisers to ensure that their agents / franchisees also adhere to these guidelines.

5. Authorised Persons should bring the contents of this Circular to the notice of their constituents concerned.

6. The contents of (F), viz. Anti-Money Laundering (AML) Guidelines, of [Annex-I of the A.P.\(DIR Series\) Circular No. 57 \[A.P. \(FL/RL\) Series Circular No. 04\]](#) dated March 9, 2009 on Memorandum of Instructions governing money changing activities are replaced with (F-Part-I), (F-Part-II) and (F-Part-III) annexed to this Circular. All the other instructions of [A.P.\(DIR Series\) Circular No. 57 \[A.P. \(FL/RL\) Series Circular No. 04\]](#) dated March 9, 2009 remain unchanged.

7. The directions contained in this Circular have been issued under Section 10(4) and Section 11(1) of the Foreign Exchange Management Act, 1999 (42 of 1999) and also under the, Prevention of Money Laundering Act, (PMLA), 2002, as amended by Prevention of Money Laundering (Amendment) Act, 2009 and Prevention of Money-Laundering (Maintenance of Records of the Nature and Value of Transactions, the Procedure and Manner of Maintaining and Time for Furnishing Information and Verification and Maintenance of Records of the Identity of the Clients of the Banking Companies, Financial Institutions and Intermediaries) Rules, 2005 as amended from time to time. Non-compliance with the guidelines would attract penal provisions of the Acts concerned or Rules made there under.

Yours faithfully,

(Salim Gangadharan)

Chief General Manager-in-Charge

(F-Part-I)

[Annex to A.P. (DIR Series) Circular No.17
{A.P. (FL/RL Series) Circular No. 4
dated November 27, 2009]

Know Your Customer (KYC) norms/Anti-Money Laundering (AML) standards/Combating the Financing of Terrorism (CFT)/Obligation of APs under Prevention of Money Laundering Act, (PMLA), 2002, as amended by Prevention of Money Laundering (Amendment) Act, 2009- Money Changing activities

1. Introduction

The offence of Money Laundering has been defined in Section 3 of the Prevention of Money Laundering Act, 2002 (PMLA) as "whosoever directly or indirectly attempts to indulge or knowingly assists or knowingly is a party or is actually involved in any process or activity connected with the proceeds of crime and projecting it as untainted property shall be guilty of offence of money laundering". Money Laundering can be called a process by which money or other assets obtained as proceeds of crime are exchanged for "clean money" or other assets with no obvious link to their criminal origins.

There are three stages of money laundering during which there may be numerous transactions made by launderers that could alert an institution to criminal activity –

- **Placement** - the physical disposal of cash proceeds derived from illegal activity.
- **Layering** - separating illicit proceeds from their source by creating complex layers of financial transactions designed to disguise the audit trail and provide anonymity.
- **Integration** - the provision of apparent legitimacy to criminally derived wealth. If the layering process has succeeded, integration schemes place the laundered proceeds back into the economy in such a way that they re-enter the financial system appearing to be normal business funds.

2. The objective

The objective of prescribing KYC/AML/CFT guidelines is to prevent the system of purchase and / or sale of foreign currency notes / Travellers' Cheques by Authorised Persons (referred as APs hereinafter) from being used, intentionally or unintentionally, by criminal elements for money laundering or terrorist financing activities. KYC procedures also enable APs to know / understand their customers and their financial dealings better which in turn help them manage their risks prudently.

3. Definition of Customer

For the purpose of KYC policy, a 'Customer' is defined as :

- a person who undertakes occasional/regular transactions;
- an entity that has a business relationship with the AP;
- one on whose behalf the transaction is made (i.e. the beneficial owner).

4. Guidelines

4.1 General

APs should keep in mind that the information collected from the customer while undertaking transactions is to be treated as confidential and details thereof are not to be divulged for cross selling or any other like purposes. APs should, therefore, ensure that information sought from the customer is relevant to the perceived risk, is not intrusive, and is in conformity with the guidelines issued in this regard. Any other information from the customer, wherever necessary, should be sought separately with his/her consent.

4.2 KYC Policy

APs should frame their KYC policies incorporating the following four key elements:

- a) Customer Acceptance Policy;
- b) Customer Identification Procedures;
- c) Monitoring of Transactions; and
- d) Risk Management.

4.3 Customer Acceptance Policy (CAP)

a) Every AP should develop a clear Customer Acceptance Policy laying down explicit criteria for acceptance of customers. The Customer Acceptance Policy must ensure that explicit guidelines are in place on the following aspects of customer relationship in the AP:

- i)** No transaction is conducted in anonymous or fictitious/benami name(s).
- ii)** Parameters of risk perception are clearly defined in terms of the nature of business activity, location of customer and his clients, mode of payments, volume of turnover, social and financial status, etc. to enable categorisation of customers into low, medium and high risk (APs may choose any suitable nomenclature viz. level I, level II and level III). Customers requiring very high level of monitoring, e.g. Politically Exposed Persons (PEPs) may, if considered necessary, be categorised even higher.
- iii)** Documentation requirements and other information to be collected in respect of different categories of customers depending on perceived risk and keeping in mind the requirements of Prevention of Money Laundering Act, (PMLA), 2002, as amended by Prevention of Money Laundering (Amendment) Act, 2009, Prevention of Money-Laundering (Maintenance of Records of the Nature and Value of Transactions, the Procedure and Manner of Maintaining and Time for Furnishing Information and Verification and Maintenance of Records of the Identity of the Clients of the Banking Companies, Financial Institutions and Intermediaries) Rules, 2005 as well as instructions/guidelines issued by the Reserve Bank, from time to time.
- iv)** Not to undertake any transaction where the AP is unable to apply appropriate customer due diligence measures i.e. AP is unable to verify the identity and /or obtain documents required as per the risk categorisation due to non cooperation of the customer or non reliability of the data/information furnished to the AP. It is, however, necessary to have suitable built in safeguards to avoid harassment of the customer.

v) Circumstances, in which a customer is permitted to act on behalf of another person/entity, should be clearly spelt out, the beneficial owner should be identified and all reasonable steps should be taken to verify his identity.

b) APs should prepare a profile for each customer, where a business relationship is established, based on risk categorisation. The customer profile may contain information relating to customer's identity, his sources of funds, social/financial status, nature of business activity, information about his clients' business and their location, etc. The nature and extent of due diligence will depend on the risk perceived by the AP. However, while preparing customer profile, APs should take care to seek only such information from the customer, which is relevant to the risk category. The customer profile is a confidential document and details contained therein should not be divulged for cross selling or any other purposes.

c) For the purpose of risk categorisation, individuals (other than High Net Worth) and entities whose identities and sources of wealth can be easily identified and transactions by whom by and large conform to the known profile, may be categorised as low risk. Customers that are likely to pose a higher than average risk should be categorised as medium or high risk depending on customer's background, nature and location of activity, country of origin, sources of funds and his client profile etc. APs should apply enhanced due diligence measures based on the risk assessment, thereby requiring intensive 'due diligence' for higher risk customers, especially those for whom the sources of funds are not clear. Examples of customers requiring enhanced due diligence include (a) non-resident customers; (b) customers from countries that do not or insufficiently apply the FATF standards; (c) high net worth individuals; (d) trusts, charities, NGOs and organizations receiving donations; (e) companies having close family shareholding or beneficial ownership; (f) firms with 'sleeping partners'; (g) politically exposed persons (PEPs); (h) non-face to face customers; and (i) those with dubious reputation as per public information available etc. However, only NPOs/NGOs promoted by United Nations or its agencies may be classified as low risk customer.

d) It is important to bear in mind that the adoption of customer acceptance policy and its implementation should not become too restrictive and must not result in denial of money changing services to general public.

4.4 Customer Identification Procedure (CIP)

a) The policy approved by the Board of APs should clearly spell out the Customer Identification Procedure to be carried out at different stages i.e. while establishing a business relationship; carrying out a financial transaction or when the AP has a doubt about the authenticity/veracity or the adequacy of the previously obtained customer identification data. Customer identification means identifying the customer and verifying his/her identity by using reliable, independent source documents, data or information. APs need to obtain sufficient information necessary to establish, to their satisfaction, the identity of each new customer, whether occasional or business relationship, and the purpose of the intended nature of relationship. Being satisfied means that the AP must be able to satisfy the competent authorities that due diligence was observed based on the risk profile of the customer in compliance with the extant guidelines in place. Such risk based approach is considered necessary to avoid disproportionate cost to APs and a burdensome regime for the customers. Besides risk perception, the nature of information/documents required would also depend on the type of customer (individual, corporate, etc.). For customers that are natural persons, the APs should obtain sufficient identification document /s to verify the identity of the customer and his address/location. For customers that are legal persons or entities, the AP should (i) verify the legal status of the legal person / entity through proper and relevant documents; (ii) verify that any person purporting to act on behalf of the legal person/entity is so authorised and identify and verify the identity of that person; and (iii) understand the ownership and control structure of the customer and determine who are the natural persons who ultimately control the legal person. Customer identification requirements in respect of a few typical cases, especially, legal persons requiring an extra element of caution are given in paragraph 4.5 below for guidance of APs. APs may, however, frame their own internal guidelines based on their experience of dealing with such persons / entities, their normal prudence and the legal requirements as per established practices. If the AP decides to undertake such transactions in terms of the

Customer Acceptance Policy, the AP should take reasonable measures to identify the beneficial owner(s) and take all reasonable steps to verify his identity.

b) Some close relatives, e.g. wife, son, daughter and parents, etc. who live with their husband, father/mother and son, as the case may be, may find it difficult to undertake transactions with APs as the utility bills required for address verification are not in their name. It is clarified, that in such cases, APs can obtain an identity document and a utility bill of the relative with whom the prospective customer is living along with a declaration from the relative that the said person (prospective customer) wanting to undertake a transaction is a relative and is staying with him/her. APs can use any supplementary evidence such as a letter received through post for further verification of the address. While issuing operational instructions to the branches on the subject, APs should keep in mind the spirit of instructions issued by the Reserve Bank and avoid undue hardships to individuals who are, otherwise, classified as low risk customers.

c) APs should introduce a system of periodic updation of customer identification data (including photograph/s) if there is a continuing business relationship.

d) An indicative list of the nature and type of documents/information that may be relied upon for customer identification is given in (F-Part-II) annexed to this Circular. It is clarified that correct permanent address, as referred to in (F-Part-II) annexed, means the address at which a person usually resides and can be taken as the address as mentioned in a utility bill or any other document accepted by the AP for verification of the address of the customer.

e) Purchase of foreign exchange from customers

i) For purchase of foreign currency notes and/ or Travellers' Cheques from customers for any amount less than US \$ 200 or its equivalent, photocopies of the identification document need not be obtained. However, full details of the identification document should be maintained.

ii) For purchase of foreign currency notes and/ or Travellers' Cheques from customers for any amount in excess of US \$ 200 or its equivalent, the

identification documents, as mentioned at (F-Part-II) annexed to this Circular, should be verified and a copy retained.

iii) (a) Requests for payment in cash in Indian Rupees to resident customers towards purchase of foreign currency notes and/ or Travellers' Cheques from them may be acceded to the extent of only US \$ 1000 or its equivalent per transaction.

(b) Requests for payment in cash by foreign visitors / Non-Resident Indians may be acceded to the extent of only US \$ 3000 or its equivalent.

(c) All purchases within one month may be treated as single transaction for the above purpose and also for reporting purposes.

(d) In all other cases, APs should make payment by way of 'Account Payee' cheque / demand draft only.

v) Where the amount of forex tendered for encashment by a non-resident or a person returning from abroad exceeds the limits prescribed for Currency Declaration Form (CDF), the AP should invariably insist for production of the declaration in CDF.

vi) In case of any suspicion of money laundering or terrorist financing, irrespective of the amount involved, enhanced Customer Due Diligence (CDD) should be applied.

f) Sale of foreign exchange to customers

(i) **In all cases of sale of foreign exchange, irrespective of the amount involved**, for identification purpose the passport of the customer should be insisted upon and sale of foreign exchange should be made only on personal application and after verification of the identification document. A copy of the identification document should be retained by the AP.

(ii) Payment in excess of Rs. 50,000 towards sale of foreign exchange should be received only by crossed cheque drawn on the bank account of the applicant's firm / company sponsoring the visit of the applicant / Banker's cheque / Pay

Order / Demand Draft. Such payment can also be received through debit cards / credit cards / prepaid cards provided (a) KYC/ AML guidelines are complied with, (b) sale of foreign currency / issue of Foreign Currency Travellers' cheques is within the limits (credit / prepaid cards) prescribed by the bank, (c) the purchaser of foreign currency / Foreign Currency Travellers' Cheque and the credit / debit / prepaid card holder is one and the same person.

(iii) All purchases made by a person within one month may be treated as single transaction for the above purpose and also for reporting purposes.

(iv) Encashment Certificate, wherever required, should also be insisted upon.

g) Establishment of business relationship

Relationship with a business entity like a company / firm/ trusts and foundations should be established only after conducting due diligence by obtaining and verifying suitable documents, as mentioned at (F-Part-II) annexed to this Circular. Copies of all documents called for verification should be kept on record. APs should obtain information on the purpose and intended nature of the business relationship. APs should exercise ongoing due diligence with respect to the business relationship with every client and closely examine the transactions in order to ensure that they are consistent with their knowledge of the customer, its business and risk profile. APs should ensure that documents, data or information collected under the Customer Due Diligence process is kept up-to-date and relevant by undertaking reviews of existing records, particularly for higher risk categories of customers or business relationships. When a business relationship is already in existence and it is not possible to perform customer due diligence on the customer in respect of business relationship, APs should terminate the business relationship and make a Suspicious Transaction Report to FIU-IND.

4.5 Customer Identification Requirements – Indicative Guidelines

i) Transactions by Trust/Nominee or Fiduciary Customers

There exists the possibility that trust/nominee or fiduciary relationship can be used to circumvent the customer identification procedures. APs should determine whether the customer is acting on behalf of another person as trustee/nominee or

any other intermediary. If so, APs should insist on receipt of satisfactory document of identity of the intermediaries and of the persons on whose behalf they are acting, as also obtain details of the nature of the trust or other arrangements in place. While undertaking a transaction for a trust, APs should take reasonable precautions to verify the identity of the trustees and the settlers of trust (including any person settling assets into the trust), grantors, protectors, beneficiaries and signatories. In all cases beneficiaries should be identified with reference to necessary documents. In the case of a 'foundation', steps should be taken to verify the founder managers/ directors and the beneficiaries.

ii) Transactions by companies and firms

APs need to be vigilant against business entities being used by individuals as a 'front' for undertaking transactions with APs. APs should examine the control structure of the entity, determine the source of funds and identify the natural persons who have a controlling interest and who comprise the management. These requirements may be moderated according to the risk perception e.g. in the case of a company that is listed on a recognized stock exchange, it will not be necessary to identify all the shareholders.

iii) Transactions by Politically Exposed Persons (PEPs)

Politically exposed persons are individuals who are or have been entrusted with prominent public functions in a foreign country, e.g., Heads of States or of Governments, senior politicians, senior government/judicial/military officers, senior executives of state-owned corporations, important political party officials, etc. APs should gather sufficient information on any person/customer of this category intending to undertake a transaction or establish a business relationship and check all the information available on the person in the public domain. APs should verify the identity of the person and seek information about the source of wealth and source of funds before accepting the PEP as a customer. The decision to undertake a transaction with a PEP should be taken at a senior level which should be clearly spelt out in Customer Acceptance Policy. APs should also subject such transactions to enhanced monitoring on an ongoing basis. The above norms may also be applied to transactions with the family members or

close relatives of PEPs. The above norms may also be applied to customers who become PEPs subsequent to establishment of the business relationship.

Where a customer subsequently becomes a PEP after a business relationship has already been established, enhanced CDD should be performed on such customers and decision to continue business relationship with the PEP should be taken at a sufficiently senior level.

4.6 Monitoring of Transactions

Ongoing monitoring is an essential element of effective KYC procedures. APs can effectively control and reduce their risk only if they have an understanding of the normal and reasonable activity of the customer so that they have the means of identifying transactions that fall outside the regular pattern of activity. However, the extent of monitoring will depend on the risk sensitivity of the transaction. APs should pay special attention to all complex, unusually large transactions and all unusual patterns which have no apparent economic or visible lawful purpose. APs may prescribe threshold limits for a particular category of transaction and pay particular attention to the transactions which exceed these limits. High-risk transactions have to be subjected to intensified monitoring. Every AP should set key indicators for such transactions, taking note of the background of the customer, such as the country of origin, sources of funds, the type of transactions involved and other risk factors. APs should put in place a system of periodical review of risk categorization of customers and the need for applying enhanced due diligence measures. Such review of risk categorisation of customers should be carried out periodically.

4.7 Attempted transactions

Where the AP is unable to apply appropriate KYC measures due to non-furnishing of information and /or non-cooperation by the customer, the AP should not undertake the transaction. Under these circumstances, APs should make a suspicious transactions report to FIU-IND in relation to the customer, even if the transaction is not put through.

4.8 Risk Management

a) The Board of Directors of the AP should ensure that an effective KYC programme is put in place by establishing appropriate procedures and ensuring effective implementation. It should cover proper management oversight, systems and controls, segregation of duties, training and other related matters. Responsibility should be explicitly allocated within the AP for ensuring that the APs' policies and procedures are implemented effectively. APs should, in consultation with their boards, devise procedures for creating risk profiles of their existing and new customers and apply various anti money laundering measures keeping in view the risks involved in a transaction or business relationship.

b) APs' internal audit and compliance functions have an important role in evaluating and ensuring adherence to the KYC policies and procedures. As a general rule, the compliance function should provide an independent evaluation of the AP's own policies and procedures, including legal and regulatory requirements. APs should ensure that their audit machinery is staffed adequately with individuals who are well-versed in such policies and procedures. The concurrent auditors should check all transactions to verify that they have been undertaken in compliance with the anti-money laundering guidelines and have been reported whenever required to the concerned authorities. Compliance on the lapses, if any, recorded by the concurrent auditors should be put up to the Board. A certificate from the Statutory Auditors on the compliance with KYC / AML / CFT guidelines should be obtained at the time of preparation of the Annual Report and kept on record.

4.9 Introduction of New Technologies- Pre-paid Cards

APs should pay special attention to any money laundering threats that may arise from new or developing technologies, that might favour anonymity and take measures, to prevent their use for money laundering purposes. Certain AD Cat-I banks are engaged in issuance of Foreign currency denominated pre-paid cards to travelers going abroad. While issuing these pre-paid cards, it should be ensured that all the KYC / AML/ CFT Guidelines are fully complied with. It is also desirable that, certain APs, who are not eligible to issue such cards but are

involved in marketing these cards on behalf of the card issuing banks, as well as their customers, are also subjected to KYC measures.

4.10 Combating Financing of Terrorism

a) In terms of PML Rules, suspicious transaction should include, *inter alia* transactions which give rise to a reasonable ground of suspicion that it may involve the proceeds of an offence mentioned in the Schedule to the PMLA, regardless of the value involved. APs should, therefore, develop suitable mechanism through appropriate policy framework for enhanced monitoring of transactions suspected of having terrorist links and swift identification of the transactions and making suitable reports to the Financial Intelligence Unit – India (FIU-IND) on priority.

b) APs are advised to take into account risks arising from the deficiencies in AML/CFT regime of certain jurisdictions viz. Iran, Uzbekistan, Pakistan, Turkmenistan, Sao Tome and Principe, as identified in FATF Statement (www.fatf-gafi.org), issued from time to time, while dealing with individuals or businesses from these jurisdictions.

4.11 Applicability to branches and subsidiaries outside India

The guidelines contained in this Circular shall apply to the branches and majority owned subsidiaries located abroad, especially, in countries which do not or insufficiently apply the FATF Recommendations, to the extent local laws permit. When local applicable laws and regulations prohibit implementation of these guidelines, the same should be brought to the notice of the Reserve Bank. In case there is a variance in KYC / AML / CFT standards prescribed by the Reserve Bank and the host country regulators, branches/overseas subsidiaries of APs are required to adopt the more stringent regulation of the two.

4.12 Principal Officer

a) APs should appoint a senior management officer to be designated as Principal Officer. Principal Officer shall be located at the head/corporate office of the AP and shall be responsible for monitoring and reporting of all transactions and sharing of information as required under the law. The Principal Officer should

also be responsible for developing appropriate compliance management arrangements across the full range of AML/CFT areas (e.g. CDD, record keeping, etc.). He will maintain close liaison with enforcement agencies, APs and any other institution which are involved in the fight against money laundering and combating financing of terrorism. With a view to enable the Principal Officer to discharge his responsibilities, it is advised that that the Principal Officer and other appropriate staff should have timely access to customer identification data and other CDD information, transaction records and other relevant information. Further, banks should ensure that the Principal Officer is able to act independently and report directly to the senior management or to the Board of Directors.

b) The Principal Officer will be responsible for timely submission of CTR and STR to the FIU-IND.

4.13 Maintenance of records of transactions/Information to be preserved/Maintenance and preservation of records/Cash and Suspicious Transactions Reporting to Financial Intelligence Unit- India (FIU-IND)

Section 12 of the Prevention of Money Laundering Act (PMLA), 2002, as amended by Prevention of Money Laundering (Amendment) Act, 2009, casts certain obligations on the APs in regard to preservation and reporting of transaction information. APs are, therefore, advised to go through the provisions of Prevention of Money Laundering Act, (PMLA), 2002, as amended by Prevention of Money Laundering (Amendment) Act, 2009 and the Rules notified there under and take all steps considered necessary to ensure compliance with the requirements of Section 12 of the Act *ibid*.

(i) Maintenance of records of transactions

APs should introduce a system of maintaining proper record of transactions prescribed under Rule 3, as mentioned below:

a) all cash transactions of the value of more than Rupees Ten Lakh or its equivalent in foreign currency;

b) all series of cash transactions integrally connected to each other which have been valued below Rupees Ten Lakh or its equivalent in foreign currency where such series of transactions have taken place within a month; and

c) all suspicious transactions whether or not made in cash and by way of as mentioned in the Rules.

(ii) Information to be preserved

APs are required to maintain the following information in respect of transactions referred to in Rule 3:

- a)** the nature of the transactions;
- b)** the amount of the transaction and the currency in which it was denominated;
- c)** the date on which the transaction was conducted; and
- d)** the parties to the transaction

(iii) Maintenance and Preservation of Record

a) APs are required to maintain the records containing information in respect of transactions referred to in Rule 3 above. APs should take appropriate steps to evolve a system for proper maintenance and preservation of transaction information in a manner that allows data to be retrieved easily and quickly whenever required or when requested by the competent authorities. Further, APs should maintain for at least **ten years** from the date of transaction between the AP and the client, all necessary records of transactions, both with residents and non-residents, which will permit reconstruction of individual transactions (including the amounts and types of currency involved, if any) so as to provide, if necessary, evidence for prosecution of persons involved in criminal activity.

b) APs should ensure that records pertaining to the identification of the customer and his address (e.g. copies of documents like passport, driving license, PAN card, voter identity card issued by the Election Commission, utility bills, etc.) obtained while undertaking the transaction and during the course of business relationship, are properly preserved for at least **ten years** from the date of

cessation of the transaction / business relationship. The identification records and transaction data should be made available to the competent authorities upon request.

c) In paragraph 4.6 of this Circular, APs have been advised to pay special attention to all complex, unusual large transactions and all unusual patterns of transactions, which have no apparent economic or visible lawful purpose. It is further clarified that the background including all documents/office records / memoranda pertaining to such transactions and purpose thereof should, as far as possible, be examined and the findings at branch as well as Principal Officer's level should be properly recorded. Such records and related documents should be made available to help auditors in their day-to-day work relating to scrutiny of transactions and also to Reserve Bank/other relevant authorities. These records are required to be preserved for **ten years** as is required under PMLA, 2002 Prevention of Money Laundering Act, (PMLA), 2002, as amended by Prevention of Money Laundering (Amendment) Act, 2009 and Prevention of Money-Laundering (Maintenance of Records of the Nature and Value of Transactions, the Procedure and Manner of Maintaining and Time for Furnishing Information and Verification and Maintenance of Records of the Identity of the Clients of the Banking Companies, Financial Institutions and Intermediaries) Rules, 2005 as amended from time to time.

(iv) Reporting to Financial Intelligence Unit – India

a) In terms of the PML rules, APs are required to report information relating to cash and suspicious transactions to the Director, Financial Intelligence Unit-India (FIU-IND) in respect of transactions referred to in Rule 3 at the following address:

The Director,
Financial Intelligence Unit-India (FIU-IND)
6th Floor, Hotel Samrat,
Chanakyapuri, **New Delhi-110021**.
Website - <http://fiuindia.gov.in/>

b) APs should carefully go through all the reporting formats. There are altogether four reporting formats, as detailed in (F-Part-III) annexed to this circular, viz. i) Cash Transactions Report (CTR); ii) Electronic File Structure-CTR; iii) Suspicious

Transactions Report (STR); iv) Electronic File Structure-STR. The reporting formats contain detailed guidelines on the compilation and manner/procedure of submission of the reports to FIU-IND. It would be necessary for APs to initiate urgent steps to ensure electronic filing of all types of reports to FIU-IND. The related hardware and technical requirement for preparing reports in an electronic format, the related data files and data structures thereof are furnished in the instructions part of the formats concerned.

c) In terms of instructions contained in paragraph 4.3(b) of this Circular, APs are required to prepare a profile for each customer based on risk categorisation. Further, vide paragraph 4.6, the need for periodical review of risk categorisation has been emphasized. It is, therefore, reiterated that APs, as a part of transaction monitoring mechanism, are required to put in place an appropriate software application to throw alerts when the transactions are inconsistent with risk categorization and updated profile of customers. It is needless to add that a robust software throwing alerts is essential for effective identification and reporting of suspicious transactions.

4.14 Cash and Suspicious Transaction Reports

A) Cash Transaction Report (CTR)

While detailed instructions for filing all types of reports are given in the instructions part of the related formats, APs should scrupulously adhere to the following:

- i)** The Cash Transaction Report (CTR) for each month should be submitted to the FIU-IND by 15th of the succeeding month. Cash transaction reporting by branches to their controlling offices should, therefore, invariably be submitted on a monthly basis and APs should ensure to submit CTR for every month to FIU-IND within the prescribed time schedule.
- ii)** While filing CTR, details of individual transactions below Rs.50,000 need not be furnished.
- iii)** CTR should contain only the transactions carried out by the AP on behalf of their customers excluding transactions between the internal accounts of the AP.

iv) A cash transaction report for the AP as a whole should be compiled by the Principal Officer of the AP every month in physical form as per the format specified. The report should be signed by the Principal Officer and submitted to the FIU-India.

v) In case of Cash Transaction Reports (CTR) compiled centrally by APs for the branches at their central data centre level, APs may generate centralised Cash Transaction Reports (CTR) in respect of branches under central computerized environment at one point for onward transmission to FIU-IND, provided:

a) The CTR is generated in the format prescribed by Reserve Bank in Para 4.13(iv)(b) of this Circular.

b) A copy of the monthly CTR submitted on its behalf to the FIU-India is available at the concerned branch for production to auditors/inspectors, when asked for.

c) The instruction on 'Maintenance of records of transactions'; 'Information to be preserved' and 'Maintenance and Preservation of records' as contained above in this Circular at Para 4.13 (i), (ii) and (iii) respectively are scrupulously followed by the branch.

However, in respect of branches not under central computerized environment, the monthly CTR should continue to be compiled and forwarded by the branch to the Principal Officer for onward transmission to the FIU-IND.

B) Suspicious Transaction Reports (STR)

i) While determining suspicious transactions, APs should be guided by definition of suspicious transaction contained in PML Rules, as amended from time to time.

ii) It is likely that in some cases transactions are abandoned/aborted by customers on being asked to give some details or to provide documents. It is clarified that APs should report all such attempted transactions in STRs, even if not completed by customers, irrespective of the amount of the transaction.

iii) APs should make STRs if they have reasonable ground to believe that the transaction, including an attempted transaction, involves proceeds of crime

irrespective of the amount of transaction and/or the threshold limit envisaged for predicate offences in part B of Schedule of Prevention of Money Laundering Act, (PMLA), 2002, as amended by Prevention of Money Laundering (Amendment) Act, 2009 .

iv) The Suspicious Transaction Report (STR) should be furnished within 7 days of arriving at a conclusion that any transaction, including an attempted transaction, whether cash or non-cash, or a series of transactions integrally connected are of suspicious nature. The Principal Officer should record his reasons for treating any transaction or a series of transactions as suspicious. It should be ensured that there is no undue delay in arriving at such a conclusion once a suspicious transaction report is received from a branch or any other office. Such report should be made available to the competent authorities on request.

v) In the context of creating KYC/ AML awareness among the staff and for generating alerts for suspicious transactions, APs may consider the following indicative list of suspicious activities.

Some possible suspicious activity indicators are given below:

- Customer is reluctant to provide details / documents on frivolous grounds.
- The transaction is undertaken by one or more intermediaries to protect the identity of the beneficiary or hide their involvement.
- Size and frequency of transactions is high considering the normal business of the customer.
- Change in the pattern of transactions.

The above list is only indicative and not exhaustive.

vi) APs should not put any restrictions on transactions where an STR has been made. Moreover, it should be ensured that employees of APs shall keep the fact of furnishing such information as strictly confidential and there is no **tipping off** to the customer at any level.

4.15 Customer Education/Employees' Training/Employees' Hiring

a) Customer Education

Implementation of KYC procedures requires APs to demand certain information from customers which may be of personal nature or which has hitherto never been called for. This can sometimes lead to a lot of questioning by the customer as to the motive and purpose of collecting such information. There is, therefore, a need for APs to prepare specific literature / pamphlets, etc. so as to educate the customer of the objectives of the KYC programme. The front desk staff needs to be specially trained to handle such situations while dealing with customers.

b) Employees' Training

APs must have an ongoing employee training programme so that the members of the staff are adequately trained to be aware of the policies and procedures relating to prevention of money laundering, provisions of the PMLA and the need to monitor all transactions to ensure that no suspicious activity is being undertaken under the guise of money changing. Training requirements should have different focuses for frontline staff, compliance staff and staff dealing with new customers. It is crucial that all those concerned fully understand the rationale behind the KYC policies and implement them consistently. The steps to be taken when the staff come across any suspicious transactions (such as asking questions about the source of funds, checking the identification documents carefully, reporting immediately to the Principal Officer, etc.) should be carefully formulated by the AP and suitable procedure laid down. The APs should have an ongoing training programme for consistent implementation of the AML measures.

c) Hiring of Employees

It may be appreciated that KYC norms/AML standards/CFT measures have been prescribed to ensure that criminals are not allowed to misuse the system of APs. It would, therefore, be necessary that adequate screening mechanism is put in place by APs as an integral part of their recruitment/hiring process of personnel to ensure high standards.

(F-Part-II)

**[Annex to A.P. (DIR Series) Circular No.17
{A.P. (FL/RL Series) Circular No. 4
dated November 27, 2009]**

**Customer Identification Procedure
Features to be verified and documents
that may be obtained from customers**

Features	Documents
<p>Transactions with individuals</p> <p>- Legal name and any other names used</p> <p>- Correct permanent address</p>	<p>(i) Passport (ii) PAN card (iii) Voter's Identity Card (iv) Driving licence (v) Identity card (subject to the AP's satisfaction) (vi) Letter from a recognized public authority or public servant verifying the identity and residence of the customer to the satisfaction of the AP.</p> <p>(i) Telephone bill (ii) Bank account statement (iii) Letter from any recognized public authority (iv) Electricity bill (v) Ration card (vi) Letter from employer (subject to satisfaction of the AP).</p> <p>(any one of the documents, which provides customer information to the satisfaction of the AP will suffice).</p>
<p>Establishment of business relationship- corporates</p> <p>- Name of the corporate</p> <p>- Principal place of business</p> <p>- Mailing address of the corporate</p> <p>- Telephone/Fax Number</p>	<p>Certified copy each of the following documents.</p> <p>(i) Certificate of incorporation (ii) Memorandum & Articles of Association (iii) Resolution of the Board of Directors for undertaking forex transactions with the AP (iv) Power of attorney granted to its managers, officers or employees to conduct forex transactions on behalf of the corporate and their identification. (v) PAN Card (vi) Telephone Bill</p>

<p>Establishment of business relationship- partnership firms</p> <p>-Legal name -Address -Names of all partners and their addresses -Telephone/ Fax numbers of the firm and partners</p>	<p>One certified copy each of the following:</p> <p>(i) Registration certificate, if registered (ii) Partnership deed (iii) Power of Attorney granted to a partner or an employee of the firm to transact business on its behalf (iv) Any officially valid document identifying the partners and the persons holding the Power of Attorney, their addresses and their signatures. (v) Telephone bill in the name of firm/ partners.</p>
<p>Establishment of business relationship- trusts and foundations</p> <p>-Names of trustees, settlers, beneficiaries and signatories -Names and addresses of the founder, the managers/ directors and the beneficiaries -Telephone/ Fax numbers</p>	<p>One certified copy of each of the following :</p> <p>(i) Registration certificate, if registered (ii) Power of Attorney granted to transact business on its behalf (iii) Any officially valid document to identify the trustees, settlers, beneficiaries and those holding Power of Attorney, founders/ managers/ directors and their addresses (iv) Resolution of the managing body of the foundation/ association (v) Telephone bill</p>

(F-Part-III)

**[Annex to A.P. (DIR Series) Circular No.17
{A.P. (FL/RL Series) Circular No. 4
dated November 27, 2009]**

List of various reports and their formats

1. Cash Transaction Report (CTR)
2. Electronic File Structure- CTR
3. Suspicious Transaction Report (STR)
4. Electronic File Structure-STR

BRANCH DETAIL SHEET FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR

ANNEXURE

1. Name of Reporting Entity
2. Reporting Role
3. Institution Relation Flag
4. Institution Name
5. Institution Branch Name
6. Institution Reference Number
7. Branch Address

8. Branch City
9. Pin code
10. Country Code
11. Telephone
12. Fax
13. E-mail
14. Branch Remarks

INSTRUCTIONS

As there could be more than one branch/location relevant to the STR, appropriate details should be provided in separate sheet.

2. Reporting Role:

- “A”-Reporting Entity itself
- “B”- Other Than Reporting Entity

3. Institution Relation Flag:

- “A”- Transaction Institution (Institution where transaction was conducted)
- “B”- Instrument Issue Institution (Institution where instrument/card was issued)
- “C”- Account with Institution (Institution having Account)
- “D”- Sending Institution (SWIFT)
- “E”-Ordering Institution (SWIFT)
- “F”- Intermediary Institution (SWIFT)
- “G”- Correspondent Institution (SWIFT)
- “H”-Acquirer Institution (Card)
- “M”- Multiple Relationships
- “Z”- Others

4. Institution Name: Name of Institution relevant to the transactions.

5. Institution Branch Name: Name of the branch/location relevant to the transactions.

10. Country Code: Country Code for the branch as Per SWIFT. Use IN for India

14. Branch Remarks: Any remark in respect of the branch/location

**INDIVIDUAL DETAIL SHEET FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR
ANNEXURE**

1. Name of Reporting Entity
2. Relation Flag
3. Individual Name
4. Customer Reference Number
5. Establishing Relationship Date
6. Father/Spouse Name
7. Occupation
8. Date of Birth
9. Sex
10. Nationality
11. ID Type
12. ID Number
13. ID Issuing Authority
14. ID Issue Place
15. PAN
16. Communication Address
17. City
18. Pin code
19. Communication Country Code
20. Telephone
21. Mobile
22. E-mail
23. Place of Work
24. Individual Remarks

INSTRUCTIONS

2. Relation Flag: Indicates the relation of Individual with the reported transactions.

- “A”- Customer
- “B”- Authorised Signatory of a Legal Person /Entity Customer
- “C”- Director/ Partner/Member etc. of a Legal Person /Entity Customer
- “D”- Introducer
- “E”- Guarantor
- “Z” – Other

9. Sex: “M”- Male, “F”- Female

10. Nationality: Country code as per SWIFT

11. ID Type:

- “A” –Passport
- “B”- Election ID Card
- “C”- PAN Card
- “D”- ID Card
- “E”- Driving License
- “Z” – Other

LEGAL PERSON/ENTITY DETAIL SHEET FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR

ANNEXURE

<p>1. Legal Person /Entity Name</p> <p>2. Relation Flag</p> <p>3. Customer Reference Number</p> <p>4. Relationship Establishing Date</p> <p>5. Nature of Business</p> <p>6. Date of Incorporation</p> <p>8. Registration Number</p> <p>9. Registering authority</p> <p>11. Country Code</p> <p>12. PAN</p> <p>13. Communication Address</p> <p>14. City</p> <p>15. Pin code</p> <p>17. Telephone</p> <p>19. Email</p> <p>20. List of Directors/partners/members and other related persons</p> <p>20.1</p> <p>20.2</p> <p>20.3</p> <p>21. Legal Person/Entity Remarks</p>	<p>7. Constitution Type</p> <p>10. Registration Place</p> <p>16. Country Code</p> <p>18. Fax</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------

INSTRUCTIONS

2. Relation Flag:
Indicates the relation of the legal person/entity with the reported transactions

- “A”- Customer
- “D”- Introducer
- “E”- Guarantor
- “Z” - Other

7. Constitution Type:

- | | |
|---------------------------|------------------|
| “A”- Sole Proprietorship | “F”- Society |
| “B”- Firm | “G”- Association |
| “C”- HUF | “H”- Trust |
| “D”- Private Ltd. Company | “I”- Liquidator |
| “E”- Public Ltd. Company | “Z”- Other |

11. Country Code: Country code for the country of incorporation as per SWIFT

**PAYMENT INSTRUMENT DETAIL SHEET FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR
ANNEXURE**

1. Name of Reporting Entity
2. Institution Name
3. Institution Reference Number
4. Payment Instrument Reference Number
5. Payment Instrument Type
6. Payment Instrument Holder Name
7. Relationship Beginning Date
8. Risk Category
9. Cumulative Purchase Turnover
10. Payment Instrument Remarks

INSTRUCTIONS

- | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>2. Institution Name: Name of Institution which has issued the payment instrument/card</p> <p>3. Institution Reference Number: Unique Code issued by the regulator/association or any temporary code for the institution</p> <p>4. Payment Instrument Reference Number: Unique Number of the payment instrument/card</p> <p>5. Payment Instrument Type:</p> <p> "G"- Credit Card
 "H"- Debit Card
 "I"- Smart Card
 "J"- Prepaid Card
 "K"- Gift Card
 "Z"- Others</p> <p>6. Payment Instrument Holder Name: Name of Person to whom the payment instrument was issued</p> | <p>7. Relationship Beginning Date: Date of issue of payment instrument in YYYY-MM-DD Format</p> <p>8. Risk Category: Risk Category as per the Internal Risk Assessment</p> <p> "A"- Low Risk
 "B"- Medium Risk
 "C"- High Risk</p> <p>9. Cumulative Purchase Turnover: Sum of all purchases in the payment Instrument /card from 1st April of the financial year till the last day of the month of reporting. If report is being furnished for Jan 2009 then transactions from 1st April 2008 to 31st Jan 2009 have to be aggregated. The amount should be rounded off to nearest rupee without decimal.</p> <p>10. Payment Instrument Remarks: Any remark in respect of the payment Instrument/ card</p> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

TRANSACTION DETAIL SHEET FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR*Read the instructions before filling the form* **ANNEXURE**

1. Name of Reporting Entity
2. Transaction Reference Number
3. Transaction Type
4. Transaction Date
5. Transaction Time
6. Instrument Type
7. Transaction Institution Name
8. Amount in Rupees
9. Currency of Transaction
10. Purpose of transaction
11. Payment Mode

Payment Instrument Details

12. Payment Instrument Number
13. Payment Instrument Issue Institution Name

Customer Details

14. Customer Name
15. Occupation
16. Date of Birth
17. Sex
18. Nationality
19. ID Type
20. ID Number
21. ID Issuing Authority
22. ID Issue Place
23. PAN
24. Address
25. City
26. Pin code
27. Country code
28. Telephone
29. Mobile number
30. E-mail

Additional Information

31. Account Number
32. Account With Institution Name
33. Related Institution Name
34. Institution Relation Flag
35. Transaction Remarks

TRANSACTION DETAIL SHEET FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR**INSTRUCTIONS**

2. Transaction Reference Number: Unique Reference Number for the transaction maintained by the reporting entity to uniquely refer to a transaction. In cases, where the reporting entity is reporting two (or more) transactions intrinsically linked to each other (money transfer sent and received), both the records should have common Transaction Reference Number to depict the complete transaction

3. Transaction Type: "P" – Purchase/Send transfer
"R" – Redemption/Receive transfer

6. Instrument Type:

"A"- Currency Note	"G"- Credit Card
"B"- Travelers Cheque	"H"- Debit Card
"C"- Demand Draft	"I"- Smart Card
"D"- Money Order	"J"- Prepaid Card
"E"-Wire Transfers/TT	"K"- Gift Card
"F"- Money Transfer	"Z"- Others

7. Transaction Institution Name: Name of the financial institution where transaction was conducted.

8. Amount in Rupees: The amount should be rounded off to nearest rupee without decimal. If this amount was not in Indian Rupees, it should be converted into Indian rupees.

9. Currency of Transaction: Mention Currency code as per SWIFT Code. "INR" for Indian Rupees

10. Purpose of transaction: Mention text to define the purpose (such as Private Visit, Visa fees)

11. Payment Mode: The mode of payment made against purchase/redemption

"A"- Cheque
"B"- Account Transfer
"C"- Cash
"D"-Demand Draft
"E"- Electronic Fund Transfer
"Z"- Others

12. Payment Instrument Number: Instrument number such as Card Number used in transaction. (if available)

13. Payment Instrument Issue Institution Name: Name of the financial institution issuing the instrument

14. Customer Name: Full Name of the customer/sender/receiver.

17. Sex: "M"- Male, "F"- Female

18. Nationality: Country code as per SWIFT. Use IN for India

19. ID Type:

"A" –Passport
"B"- Election ID Card
"C"- PAN Card
"D"- ID Card
"E"- Driving License
"Z" – Other

20. ID Number: Number mentioned in the identification document

21. ID Issuing Authority: Authority which had issued the identification document

22. ID Issue Place: Place where document was issued

27. Country Code: Country Code for the address as Per SWIFT. Use IN for India

31. Account Number: Account number, if linked to the transaction

32. Account With Institution Name: Name of the financial institution having the account linked to the transaction.

33. Related Institution Name: Name of the financial institution having the account linked to the transaction.

34. Institution Relation Flag:

"D"- Sending Institution (SWIFT)
"E"-Ordering Institution (SWIFT)
"F"- Intermediary Institution (SWIFT)
"G"- Correspondent Institution (SWIFT)
"H"-Acquirer Institution (Card)
"Z"- Others

35. Transaction Remarks: Any remark in respect of the transaction

CASH TRANSACTION REPORT FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR*Read the instructions before filling the form*

Page 1

PART 1 DETAILS OF REPORT

1.1 Date of sending report

1.2 Is this a replacement of earlier report Yes No

1.3 Date of sending original report if this is a replacement report

PART 2 DETAILS OF PRINCIPAL OFFICER

2.1 Name of Reporting Entity

2.2 Reporting Entity Category

2.3 Reporting Entity Code

2.4 Reporting Entity FIU ID

2.5 Name of Principal Officer

2.6 Designation of Principal Officer

2.7 Address of Principal Officer

2.8 City

2.9 Country

2.10 Pincode

2.11 Telephone

2.12 Fax

2.13 Email

PART 3 LIST OF TRANSACTIONS

Date	Purchase/ Redemption	Instrument Type	Currency of Transaction	Amount in Rupees	Annexure No.
3.1					
3.2					
3.3					
3.4					
3.5					
3.6					
3.7					
3.8					
3.9					
3.10					
3.11					
3.12					
3.13					
3.14					
3.15					

Total Amount in cash transactions

(Details of all transactions should be furnished in the prescribed Transaction Detail Sheet as Annexure)

Number of additional PART 3 sheets attached

(Leave blank if no extra sheet is attached)

DO NOT FILL. FOR FIU-IND USE ONLY

SAP 01

CASH TRANSACTION REPORT FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR

Read the instructions before filling the form

PART 4 LIST OF BRANCHES/LOCATIONS RELATED TO TRANSACTIONS

Name of Institution	Branch Name	Annexure No.
---------------------	-------------	--------------

- 4.1
- 4.2
- 4.3
- 4.4

(Details of all transactions should be furnished in the prescribed Branch/Location Detail Sheet as Annexure)

Number of additional PART 4 sheets attached *(Leave blank if no extra sheet is attached)*

PART 5 LIST OF PAYMENT INSTRUMENTS RELATED TO TRANSACTIONS

Payment Instrument Type	Instrument Number	Annexure No.
-------------------------	-------------------	--------------

- 5.1
- 5.2
- 5.3
- 5.4

(Details of all payment instruments should be furnished in the prescribed Payment Instrument Detail Sheet as Annexure)

Number of additional PART 5 sheets attached *(Leave blank if no extra sheet is attached)*

PART 6 LIST OF INDIVIDUALS RELATED TO TRANSACTIONS

Name of Individual(s)	Date of Birth	Annexure No.
-----------------------	---------------	--------------

- 6.1
- 6.2
- 6.3
- 6.4

(Details of all individuals should be furnished in the prescribed Individual Detail Sheet as Annexure)

Number of additional PART 6 sheets attached *(Leave blank if no extra sheet is attached)*

PART 7 LIST OF LEGAL PERSONS/ ENTITIES RELATED TO TRANSACTIONS

Name of Legal Person(s) /Entity(s)	Annexure No.
------------------------------------	--------------

- 7.1
- 7.2
- 7.3
- 7.4

(Details of all legal persons/entities should be furnished in the prescribed Legal Person/Entity Detail Sheet as Annexure)

Number of additional PART 7 sheets attached *(Leave blank if no extra sheet is attached)*

Signature

Name *(Should be same as the person mentioned in PART 2)*

CASH TRANSACTION REPORT FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR

INSTRUCTIONS

GENERAL INSTRUCTIONS

The Prevention of Money-Laundering Act

The Prevention of Money-Laundering (Amendment) Act, 2009 has included 'Authorized Persons' and 'Payment System Operators' in the category of 'financial institutions'.

"Authorized Person" under the PMLA means 'authorized person' as defined in clause (c) of section 2 of the Foreign Exchange Management Act, 1999 (FEMA).

"Payment System Operator" has been defined under the PMLA as a person who operates a payment system. "Payment system" has been defined to mean a system that enables payment to be effected between a payer and a beneficiary involving clearing, payment or settlement service or all of them and includes the systems enabling credit card operations, debit card operations, smart card operations, money transfer operations or similar operations.

Cash Transaction Report

The Prevention of Money laundering Act, 2002 and the Rules thereunder require every banking company to furnish details of the following cash transactions:

(A) All cash transactions of the value of more than rupees ten lakhs or its equivalent in foreign currency.

(B) All series of cash transactions integrally connected to each other which have been valued below rupees ten lakhs or its equivalent in foreign currency where such series of transactions have taken place within a month.

How to Submit

The CTR should be submitted to the Financial Intelligence Unit – India (FIU-IND) at the following address:

Director, FIU-IND
Financial Intelligence Unit-India
6th Floor, Hotel Samrat
Chanakyapuri, New Delhi -110021, India
(Visit <http://fiuindia.gov.in> for more details)

Due Date

The principal officer is required to furnish the information of the cash transactions of a month to Director, FIU-IND by the 15th day of the succeeding month.

EXPLANATION OF SPECIFIC TERMS

PART 1: DETAILS OF REPORT

1.1. Date of sending report is the date on which the principal officer sends the report to Director (FIU-IND).

1.2. Replacement report is a report submitted in replacement of an earlier CTR. When a replacement report is submitted, date of submitting original CTR may be mentioned and the complete CTR has to be submitted again.

PART 2: DETAILS OF PRINCIPAL OFFICER

2.2 Reporting Entity Category

"A"- Authorized Dealer – Category I	"G"- Credit Card
"B"- Authorized Dealer- Category II	"H"- Debit Card
"C"- Authorized Dealer- Category III	"I"- Smart Card
"D"- Full Fledged Money Changers	"J"- Prepaid Card
"E"- Payment System Provider	"K"- Gift Card
"F"- Payment System Participant	"Z"- Others
"Z"- Others	

2.3 Reporting Entity Code is the unique code issued by the regulator/association to identify reporting entity

2.4 Reporting Entity FIU ID may be left blank till the same is communicated by FIU-IND.

PART 3: LIST OF TRANSACTIONS

Purchase/Redemption

"P" – Purchase/Send transfer
"R" – Redemption/Receive transfer

Instrument Type

"A"- Currency Note
"B"- Travelers Cheque
"C"- Demand Draft
"D"- Money Order
"E"- Wire Transfers/TT
"F"- Money Transfer

Currency of Transaction: Mention Currency code as per SWIFT Code. "INR" for Indian Rupees

PART 4, 5, 6 and 7

All reporting entities are required to submit details of each transaction and branch in separate 'Transaction Detail Sheet' and 'Branch Detail Sheet' respectively. Information about payment instruments, individuals and Legal Person/Entity is also required to be submitted if the information therein is available with the reporting entity, and not covered in the 'Transaction Detail Sheet'

<i>Report</i>	CASH TRANSACTION REPORT
<i>Reporting Entity</i>	Authorized Person and Payment System Operator
<i>Version</i>	1.0

Contents

Introduction.....	1
Amendment to the Prevention of Money laundering Act.....	1
Cash Transaction Report.....	1
Due Date	2
Methods of filing.....	2
Manual format.....	2
Electronic format	2
Steps in preparation of data files.....	3
Steps in validation/sufficiency of data files	4
General notes for all Data Files	5
Data structure of Control File (CAPCTL.txt).....	6
Data structure of Transaction File (CAPTRN.txt).....	10
Data structure of Branch File (CAPBRC.txt)	15
Data structure of Payment Instrument File (SAPPIN.txt)	18
Data structure of Individual File (SBAINP.txt).....	20
Data structure of Legal Person/Entity File (SBALPE.txt).....	22
List of State codes.....	25

Appendix

Cash Transaction Report
Transaction Detail Sheet
Branch Detail Sheet
Instrument Detail Sheet
Individual Detail Sheet
Legal Person/Entity Detail Sheet

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

Introduction

1. The Prevention of Money Laundering Act (PMLA) forms the core of the legal framework put in place by India to combat money laundering. PMLA and the Rules notified there under impose an obligation on banking companies, financial institutions and intermediaries of the securities market to verify identity of clients, maintain records and furnish information to the Financial Intelligence Unit – India.

2. Financial Intelligence Unit – India (FIU-IND) has been established as the central national agency responsible for receiving, processing, analyzing and disseminating information relating to suspect financial transactions. FIU-IND is also responsible for coordinating and strengthening efforts of national and international intelligence and enforcement agencies in pursuing the global efforts against money laundering and related crimes. Director, FIU-IND and Director (Enforcement) have been conferred with exclusive and concurrent powers under relevant sections to implement the provisions of the Act.

Amendment to the Prevention of Money laundering Act

3. The Prevention of Money-Laundering (Amendment) Act, 2009 has included ‘Authorized Persons’ and ‘Payment System Operators’ in the category of ‘financial institutions’.

4. “Authorized Person” under the PMLA means ‘authorized person’ as defined in clause (c) of section 2 of the Foreign Exchange Management Act, 1999 (FEMA). As per Section 2 (c) of FEMA, Authorized Person means an Authorized Dealer, money changer, off-shore banking unit or any other person for the time being authorized under sub-section (1) of section 10 of FEMA to deal in foreign exchange or foreign securities. As per RBI circular dated 6.3.2006, Authorized Persons broadly cover four categories of entities – Authorized Dealer - Category I (AD-I), Authorized Dealer- Category II (AD-II), Authorized Dealer – Category III (AD-III) and Full Fledged Money Changers (FFMCs).

5. “Payment System Operator” has been defined under the PMLA as a person who operates a payment system. “Payment system” has been defined to mean a system that enables payment to be effected between a payer and a beneficiary involving clearing, payment or settlement service or all of them and includes the systems enabling credit card operations, debit card operations, smart card operations, money transfer operations or similar operations.

Cash Transaction Report

6. The Prevention of Money laundering Act, 2002 and the Rules thereunder require every banking company to furnish details of the following cash transactions:

(A) All cash transactions of the value of more than rupees ten lakhs or its equivalent in foreign currency.

(B) All series of cash transactions integrally connected to each other which have been valued below rupees ten lakhs or its equivalent in foreign currency where such series of transactions have taken place within a month.

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

Due Date

7. Rule 8 of Notification No. 9/2005 dated 1-7-2005 require the Principal Officer of a banking company to furnish the information of the cash transactions of a month to Director, FIU-IND by the 15th day of the succeeding month.

Methods of filing

8. The CTR should be submitted to the Financial Intelligence Unit – India (FIU-IND) at the following address:

Director, FIU-IND
Financial Intelligence Unit-India
6th Floor, Hotel Samrat
Chanakyapuri, New Delhi -110021, India
(Visit <http://fiuindia.gov.in> for more details)

9. Reports can be filed either in manual or electronic format. However, the reporting entity must submit all reports to FIU-IND in electronic format if it has the technical capability to do so.

Manual format

10. Cash Transaction Report for authorized person and payment system operator in manual format consists of following forms (given in the Appendix).

Form	Information
Cash Transaction Report	Summary of report and details of reporting institution
Transaction Detail Sheet	Details of transactions
Branch Detail Sheet	Details of location/branches related to the transactions
Instrument Detail Sheet	Details of payment instruments related to the transactions
Individual Detail Sheet	Details of individuals related to the transactions
Legal Person/Entity Detail Sheet	Details of legal persons/entities related to the transactions

11. All reporting entities are required to submit the CTR information in the form ‘Cash Transaction Report’ along with supporting ‘Transaction Detail Sheet’ and ‘Branch Detail Sheet’. The reporting entities are also required to submit information in the ‘Instrument Detail Sheet’, ‘Individual Detail Sheet’ and the ‘Legal Person/Entity Detail Sheet’ if the information therein is available with the reporting entity, and not covered in the ‘Transaction Detail Sheet’

Electronic format

12. FIU-IND is in the process of developing technological infrastructure to enable submission of electronic return over a secure gateway. In the interim, the reporting entities should submit the following to Director, FIU-IND:

- i) One CD containing six data files in prescribed data structure. A label mentioning name of the reporting entity, type of report (CTR), number of CTRs, report date should be affixed on each CD for the purpose of identification.

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

- ii) Each CD should be accompanied by Cash Transaction Report (same form should be used for both manual as well as electronic format) in physical form duly signed by the principal officer. Other detail sheets need not be submitted in the physical form.

13. In case of electronic filing, the reporting entity can submit data of multiple CTRs in one CD. The consolidated CTR data should have following six data files:

S No.	Filename	Description	Information About
1	CAPCTL.txt	Control File	Suspicion and Report Summary
2	CAPTRN.txt	Transaction File	Transactions
3	CAPBRC.txt	Branch File	Branches/Locations of Institutions
4	CAPINS.txt	Payment Instrument File	Payment Instrument/Card
5	CAPINP.txt	Individual File	Individuals
6	CAPLPE.txt	Legal Person/Entity File	Legal Person/Entity

14. All reporting entities are required to submit the CTR information in the Control File (CAPCTL.txt), Transaction File (CAPTRN.txt) and Branch File (CAPBRC.txt). The reporting entities are also required to submit information in the Payment Instrument File (SAPPIN.txt), Individual File (CAPINP.txt) and Legal Person/Entity File (CAPLPE.txt), if the information therein is available with the reporting entity, and not covered in the Transaction File (CAPTRN.txt)

15. The reporting entities should also ensure the following:

- i) In case the size of data files exceeds the capacity of one CD, the data files should be compressed by using Winzip 8.1 or ZipItFast 3.0 (or higher version) compression utility only to ensure quick and smooth acceptance of the file.
- ii) The CD should be virus free.

Steps in preparation of data files

16. The following steps may be followed to generate data files:

- i) The records containing details of Cash Transactions have to be extracted in Transaction Data File (CAPTRN.txt). If one or more related individuals/entities have undertaken multiple transactions, all such transactions should be included in one CTR.
- ii) The records containing details of branches/locations related to the transactions have to be extracted in Branch Data File (CAPBRC.txt). The relation flag has to be set accordingly. If multiple branches/locations are related to the Cash Transactions, details of such all such branches/locations should be included in the CTR.
- iii) If other Institutions are related to the transactions (Sending/Ordering Institution, Sender's/ Receiver's Correspondent, Intermediary Institution, Customer Account Institution) and their information is available with the reporting entity, their details have to be extracted in Branch Data File (CAPBRC.txt). The relation flag has to be set accordingly.

<i>Report</i>	<i>Reporting Entity</i>	<i>Version</i>
CASH TRANSACTION REPORT	AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	1.0

- 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 (SAPPIN.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 (CAPINP.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 (CAPLPE.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 (CAPLPE.txt), the records containing details of Authorized Signatories or Directors/ Partner/ Members etc. of Legal Persons /Entities may be appended to Individual Data File (CAPINP.txt).
- viii) The summary of related transactions in CAPTRN.txt has to be captured in relevant Individual File (CAPINP.txt).
- ix) The summary of related transactions in CAPTRN.txt has to be captured in relevant Legal Person/Entity File (CAPLPE.txt).

Steps in validation/sufficiency of data files

17. The following steps may be followed to validate the data files before submission:
 - i) There should be six data files with appropriate naming convention. If the number of data files required to report Cash Transactions details is less than six, the reporting entity should include a blank text file with appropriate naming convention to meet this sufficiency requirement.
 - ii) The data files should be as per specified data structure and rules.
 - iii) None of the mandatory fields should be left blank.
 - iv) The summary figures in Control File (CAPCTL.txt) should match with the totals in other data files.
 - v) [CTR Reference Number] should be unique in Control File (CAPCTL.txt).
 - vi) The number of records in CAPCTL.txt should match with the number of CTRs being reported in the submission.
 - vii) The values of [CTR Reference Number] in CAPTRN.txt, CAPBRC.txt, SAPPIN.txt, CAPINP.txt and CAPLPE.txt should have matching value in CAPCTL.txt.
 - viii) For each [CTR Reference Number], the [Institution Reference Number] should be unique in Branch Data File (CAPBRC.txt).
 - ix) For each [CTR Reference Number], the values of [Institution Reference Number] in CAPBRC.txt should have matching value in various relevant fields in CAPTRN.txt such as Transaction Institution Reference Number, Instrument Issue Institution Reference Number, Account With Institution Reference Number, Related Institution Reference Number.

<i>Report</i>	<i>Reporting Entity</i>	<i>Version</i>
CASH TRANSACTION REPORT	AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	1.0

- x) For each [CTR Reference Number], the values of ([Institution Reference Number] + [Payment Instrument Reference Number]) in SAPPIN.txt should have matching value in relevant fields in CAPTRN.txt.
- xi) For each [CTR Reference Number], the values of [Customer Reference Number] in CAPINP.txt and CAPLPE.txt should have matching value in relevant fields in CAPTRN.txt.
- xii) The summary figures in CAPINP.txt and CAPLPE.txt should match with the count and totals of relevant transactions in CAPTRN.txt.
- xiii) The summary figures of count and totals in CAPCTL.txt should match with the count/totals of relevant records in CAPINP.txt, CAPLPE.txt and CAPTRN.txt.

General notes for all Data Files

18. The data files should also meet the following requirements:
- i) All Data Files should be generated in ASCII Format with ".txt" as filename extension.
 - ii) Each Record (including last record) must start on new line and must end with a newline character. Hex Values: "0D" & "0A".
 - iii) All CHAR fields must be left justified. If the CHAR field is not blank and the first character is a space, the error would be called '*Leading Space error*'
 - iv) All DATE fields should be entered in YYYY-MM-DD format. If DATE field has no data then the entire field has to be filled with blank characters (Spaces).
 - v) All TIME fields should be in HH:MM:SS format.
 - vi) All NUM fields must be right justified. If NUM field has no data then the field has to be filled with '0'.
 - vii) For fields that do not have an asterisk (*), reasonable efforts have to be made to get the information. In case of CHAR fields with size exceeding 2, enter "NA" to indicate that the field is not applicable. Do not substitute any other abbreviations or special characters (e.g., "x", "-" or "*").

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

Data structure of Control File (CAPCTL.txt)

19. The control file contains report level summary of CTRs. This data structure enables submission of multiple CTRs. The number of records in CAPCTL.txt should match with the number of CTRs being reported in the submission.

S. No.	Field	Type	Size	From	To	Remarks
1	Report Name*	CHAR	3	1	3	Value should be "SAP" signifying Cash Transaction Report for Authorized Person and Payment System Operator
2	Record Type*	CHAR	3	4	6	Value should be "CTL" signifying Control file
3	Line Number*	NUM	6	7	12	Running Sequence Number for each line in the file starting from 1. This Number will be used during validation checks.
4	CTR Reference Number *	NUM	8	13	20	Indicates the running sequence number of CTR for the reporting entity starting from 1. As only one record is required to be submitted for a CTR, the CTR Reference Number should be unique. The CTR reference number would match with the number of CTRs filed with FIU. In case of replacement or supplementary CTR, it should also have the running sequence number (Serial Number of the Original Report which is being replaced or supplemented has to be provided in Sr No. 21).
5	Report Date*	DATE	10	21	30	Date of sending report to FIU-IND in YYYY-MM-DD format
6	Reporting Entity Name*	CHAR	80	31	110	Complete name of the

S. No.	Field	Type	Size	From	To	Remarks
						reporting entity which is submitting the report
7	Reporting Entity Category*	CHAR	1	111	111	<p>Category of the reporting entity which is submitting the report.</p> <p>“A”- Authorized Dealer – Category I “B”- Authorized Dealer- Category II “C”- Authorized Dealer- Category III “D”- Full Fledged Money Changers “E”-Payment System Provider “F”- Payment System Participant “Z”- Others</p> <p>If a reporting entity belongs to more than one of the above categories, the category relevant to the reported transactions needs to be mentioned.</p> <p>In case of CTR filed by a bank for Cash Transactions on card issued by them, the CTR may be filed using the CTR format for a banking company.</p>
8	Reporting Entity Code	CHAR	12	112	123	<p>Unique code issued by the regulator/association to identify reporting entity If the code is not available, this field may be left blank.</p>
9	Reporting Entity FIU ID*	CHAR	10	124	133	<p>Unique ID issued by FIU-IND to the reporting entity. Use XXXXXXXXXXXX till the ID is communicated</p>
10	Principal Officer’s Name*	CHAR	80	134	213	Field + filler spaces = 80
11	Principal Officer’s Designation*	CHAR	80	214	293	Field + filler spaces = 80
12	Principal Officer’s	CHAR	225	294	518	Complete Address

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

S. No.	Field	Type	Size	From	To	Remarks
	Address*					
13	Principal Officer's City	CHAR	50	519	568	City/Town
14	Principal Officer's Pin code/ZIP code*	CHAR	10	569	578	Pin code or ZIP code
15	Principal Officer's Country code*	CHAR	2	579	580	Country Code as Per SWIFT. Use IN for India
16	Principal Officer's Telephone	CHAR	30	581	610	Telephone in format STD Code-Telephone number
17	Principal Officer's FAX	CHAR	30	611	640	Fax number in format STD Code-Telephone number
18	Principal Officer's E-mail	CHAR	50	641	690	E-mail address
19	Report Type*	CHAR	1	691	691	"N"- New Report "R"- Replacement to earlier submitted report "S"- Supplementary Report
20	Replacement Reason *	CHAR	1	692	692	"A" – Acknowledgement of Original Report had many warnings or error messages. "B" – Operational error, data omitted in Original Report. "C" – Operational error, wrong data submitted in Original Report. "N"- Not Applicable as this is a new report "Z"- Other Reason
21	Original Report Serial Number*	NUM	8	693	700	Serial Number of the Original Report which is being replaced or supplemented. Mention 0 if Report Type is "N"
22	Operational Mode*	CHAR	1	701	701	"P"- Actual/ Production mode "T"- Test / Trial mode For normal report submission, the operational mode should be 'P'
23	Data Structure Version*	CHAR	1	702	702	Value should be 1 to indicate Version 1
24	Number of Cash	NUM	8	703	710	Count of total number of

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

S. No.	Field	Type	Size	From	To	Remarks
	Transactions reported*					records in CAPTRN.txt with matching CTR Serial Number
25	Amount in Cash Transactions *	NUM	20	711	730	Sum of amount in rupees in records in CAPTRN.txt with matching CTR Serial Number

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

Data structure of Transaction File (CAPTRN.txt)

20. The transaction file contains details of Cash Transactions.

S. No.	Field	Type	Size	From	To	Remarks
1	Record Type*	CHAR	3	1	3	Value should be "TRN" signifying Transaction data file
2	Line Number*	NUM	6	4	9	Running Sequence Number for each line in the file starting from 1. This number will be used during validation checks.
3	CTR Reference Number *	NUM	8	10	17	Indicates the running unique sequence number of CTR for the reporting entity. There should be matching value of [CTR Reference Number] in CAPCTL.txt
4	Report Date*	DATE	10	18	27	Date of sending report in YYYY-MM-DD Format. This date should be same as in control file
5	Transaction Reference Number	CHAR	20	28	47	Unique Reference Number for the transaction maintained by the reporting entity to uniquely refer to a transaction. In cases, where the reporting entity is reporting two (or more) transactions intrinsically linked to each other (money transfer sent and received), both the records should have common Transaction Reference Number to depict the complete transaction
6	Transaction Type*	CHAR	1	48	48	"P" – Purchase/Send transfer "R" – Redemption/Receive transfer The transaction type refers

S. No.	Field	Type	Size	From	To	Remarks
						<p>to the transaction conducted by the customer. The transaction file contains the purchase and redemption portion of the transaction in separate rows.</p> <p>In case of CTR submitted by an authorised person, the transaction type for purchase of forex/TC by customer is 'P'. For sale of forex/redemption of TC by customer, the transaction type is 'R'.</p> <p>In case of CTR filed by a money transfer service, the transaction type for sending transfer by a person (outside India) is 'P'. For receipt of money transfer by customer, the transaction type is 'R'.</p> <p>In case of CTR filed by a payment system provider/participant, the transaction type for use of card is 'P'. For payment by the person towards card dues, the transaction type is 'R'.</p>
7	Transaction Date *	CHAR	10	49	58	Date in YYYY-MM-DD Format
8	Transaction Time	CHAR	8	59	66	Time in HH:MM:SS Format
9	Instrument Type *	CHAR	1	67	67	<p>"A"- Currency Note "B"- Travelers Cheque "C"- Demand Draft "D"- Money Order "E"- Wire Transfers/TT "F"- Money Transfer "G"- Credit Card "H"- Debit Card</p>

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

S. No.	Field	Type	Size	From	To	Remarks
						"I"- Smart Card "J"- Prepaid Card "K"- Gift Card "Z"- Others
10	Transaction Institution Name*	CHAR	80	68	147	Name of the financial institution where transaction was conducted. In case of money transfer or money exchange, the record should contain name of the entity (agent) where transaction was conducted
11	Transaction Institution Reference Number*	CHAR	12	148	159	Unique Code issued by the regulator/association or any temporary code to uniquely identify the branch/office of the Institution where transaction was conducted. This reference number would enable linkage with the details of the institution in CAPBRC.txt
12	Transaction State Code	CHAR	2	160	161	Code for the state where transaction was conducted. In case of states/UT in India, use the state code as per the Motor Vehicles Act, 1988. Refer to the list of codes at paragraph 24 of this document.
13	Transaction Country Code*	CHAR	2	162	163	Country Code for the country where transaction was conducted as per SWIFT. Use IN for India
14	Payment Instrument Number	CHAR	20	164	183	Instrument number such as Card Number used in transaction. Information in field 14 to 17 is not required to be filled if there is no underlying payment instrument.
15	Payment Instrument Issue Institution Name	CHAR	80	184	263	Name of the financial institution issuing the instrument
16	Payment Instrument Issue Institution Reference	CHAR	12	264	275	Unique Code issued by the regulator/association or any

S. No.	Field	Type	Size	From	To	Remarks
	Number					temporary code to uniquely identify each branch/office where instrument was issued. This reference number would enable linkage with the details of the institution in CAPBRC.txt
17	Payment Instrument Country Code	CHAR	2	276	277	Country Code for the country where instrument was issued as Per SWIFT. Use IN for India
18	Amount in Rupees*	NUM	20	278	297	The amount should be rounded off to nearest rupee without decimal. If this amount was not in Indian Rupees, it should be converted into Indian rupees.
19	Amount in Foreign Currency Unit	NUM	20	298	317	The amount should be rounded off without decimal
20	Currency of Transaction*	CHAR	3	318	320	Mention Currency code as per SWIFT Code. "INR" for Indian Rupees
21	Purpose of transaction*	CHAR	20	321	340	Mention text to define the purpose (such as Private Visit, Visa fees)
22	Purpose Code	CHAR	5	341	345	Purpose code prescribed by RBI in RRETURN6.txt for loading data into the FET-ERS
23	Payment Mode	CHAR	1	346	346	The mode of payment made against purchase/redemption "A"- Cheque "B"- Account Transfer "C"- Cash "D"-Demand Draft "E"- Electronic Fund Transfer "Z"- Others
24	Customer Name*	CHAR	80	347	426	Full Name of the customer/sender/receiver. Field + filler spaces = 80

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

S. No.	Field	Type	Size	From	To	Remarks
25	Customer Reference Number	CHAR	10	427	436	Any unique reference number to identify the customer. This customer number can be temporarily allotted to enable linkage of transactions details with the individual or legal person/entity in the CAPINP.txt and CAPLPE.txt respectively.
26	Occupation	CHAR	50	437	486	Occupation
27	Date of Birth	DATE	10	487	496	In YYYY-DD-MM format
28	Sex	CHAR	1	497	497	“M”- Male “F”- Female
29	Nationality	CHAR	2	498	499	Country code as per SWIFT. Use IN for India
30	ID Type	CHAR	1	500	500	“A” –Passport “B”- Election ID Card “C”- PAN Card “D”- ID Card “E”- Driving License “Z” – Other
31	ID Number	CHAR	16	501	516	Number mentioned in the identification document
32	ID Issuing Authority	CHAR	20	517	536	Authority which had issued the identification document
33	ID Issue Place	CHAR	20	537	556	Place where document was issued
34	PAN	CHAR	10	557	566	Ten Digit PAN used by Income Tax Department
35	Address*	CHAR	225	567	791	Complete Address
36	City	CHAR	50	792	841	City/Town
37	Address Pin code/ZIP code*	NUM	10	842	851	Pin code or ZIP code
38	Address Country Code	CHAR	2	852	853	Country Code for the address as Per SWIFT. Use IN for India
39	Telephone	CHAR	30	854	883	Telephone number in format STD Code-Telephone number
40	Mobile number	CHAR	30	884	913	Mobile number
41	E-mail	CHAR	50	914	963	E-mail address
42	Account Number	CHAR	20	964	983	Account number, if linked to the transaction
43	Account With Institution	CHAR	80	984	1063	Name of the financial

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

S. No.	Field	Type	Size	From	To	Remarks
	Name					institution having the account linked to the transaction.
44	Account With Institution Reference Number	CHAR	12	1064	1075	Unique Code issued by the regulator/association or any temporary code to uniquely identify each branch/office having the account. This reference number would enable linkage with the details of the institution in CAPBRC.txt
45	Related Institution Name	CHAR	80	1076	1155	Name of the financial institution having the account linked to the transaction.
46	Institution Relation Flag	CHAR	1	1156	1156	“D”- Sending Institution (SWIFT) “E”-Ordering Institution (SWIFT) “F”- Intermediary Institution (SWIFT) “G”- Correspondent Institution (SWIFT) “H”-Acquirer Institution (Card) “Z”- Others
47	Related Institution Reference Number	CHAR	12	1157	1168	Unique Code issued by the regulator/association or any temporary code to uniquely identify branch/office having other relation to the transaction. This reference number would enable linkage with the details of the institution in CAPBRC.txt
48	Transaction Remarks	CHAR	30	1169	1198	Any remark in respect of the transaction

Data structure of Branch File (CAPBRC.txt)

21. The branch file contains information about branches of Institutions related to Cash Transactions. One CTR can contain information about multiple branches/locations of the reporting entity and multiple branches/locations of the other entities related to the transactions.

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

S. No.	Field	Type	Size	From	To	Remarks
1	Record Type*	CHAR	3	1	3	Value should be "BRC" signifying Control file
2	Line Number*	NUM	6	4	9	Running Sequence Number for each line in the file starting from 1. This Number will be used during validation checks.
3	CTR Reference Number *	NUM	8	10	17	Indicates the running unique sequence number of CTR for the reporting entity. There should be matching value of [CTR Reference Number] in CAPCTL.txt
4	Report Date*	DATE	10	18	27	Date of sending report in YYYY-MM-DD Format. This date should be same as in control file
5	Reporting Role	CHAR	1	28	28	<p>"A"-Reporting Entity itself "B"- Other Than Reporting Entity</p> <p>If the name of the branch/location of the entity in the record is different from the reporting entity, the flag should be set as 'B'.</p> <p>E.g. CTR filed by a payment system provider would have flag as 'B' in case of record containing details of branch/location of other payment system participants.</p>
6	Institution Relation Flag	CHAR	1	29	29	<p>"A"- Transaction Institution (Institution where transaction was conducted) "B"- Instrument Issue Institution (Institution where instrument/card was issued) "C"- Account with Institution (Institution</p>

S. No.	Field	Type	Size	From	To	Remarks
						<p>having Account) “D”- Sending Institution (SWIFT) “E”-Ordering Institution (SWIFT) “F”- Intermediary Institution (SWIFT) “G”- Correspondent Institution (SWIFT) “H”-Acquirer Institution (Card) “M”- Multiple Relationships “Z”- Others</p> <p>As there could be more than one branch/location relevant to the CTR, appropriate flags should be set for each record.</p>
7	Institution Name*	CHAR	80	30	109	Name of Institution relevant to the transactions. As there could be more than one branch/location relevant to the CTR, appropriate details should be provided in separate records.
8	Institution Branch Name*	CHAR	80	110	189	Name of the branch/location relevant to the transactions.
9	Institution Reference Number*	CHAR	12	190	201	<p>Unique Code issued by the regulator/association or any temporary code to uniquely identify each branch/office.</p> <p>For each [CTR Reference Number], the [Institution Reference Number] should be unique in Branch Data File (CAPBRC.txt).</p> <p>For each [CTR Reference Number], the values of</p>

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

S. No.	Field	Type	Size	From	To	Remarks
						[Institution Reference Number] in CAPBRC.txt should have matching value in various relevant fields in CAPTRN.txt such as Transaction Institution Reference Number, Instrument Issue Institution Reference Number, Account With Institution Reference Number, Related Institution Reference Number.
10	BIC of the branch	CHAR	11	202	212	Bank identification code (BIC) of the branch as per SWIFT or ISO 9362 if available
11	Branch Address*	CHAR	225	213	437	Complete Address
12	Branch City	CHAR	50	438	487	City/Town
13	Branch Pin code/ZIP code*	NUM	10	488	497	Pin code or ZIP code
14	Branch Country Code*	CHAR	2	498	499	Country Code for the branch as Per SWIFT. Use IN for India
15	Branch Telephone	CHAR	30	500	529	Telephone number in format. STD Code-Telephone number
16	Branch Fax	CHAR	30	530	559	Fax number in format STD Code-Telephone number
17	Branch E-mail	CHAR	50	560	609	E-mail address
18	Branch Remarks	CHAR	30	610	639	Any remark in respect of the branch/location

Data structure of Payment Instrument File (SAPPIN.txt)

22. The Payment Instrument file contains information about payment instrument(s)/card(s) related to the Cash Transactions. The reporting entities are required to submit relevant information in Payment Instrument File (SAPPIN.txt), if the information therein is available with the reporting entity, and not covered in the Transaction File (CAPTRN.txt)

S. No.	Field	Type	Size	From	To	Remarks
1	Record Type*	CHAR	3	1	3	Value should be "PIN" signifying Reported Payment Instrument file

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

2	Line Number*	NUM	6	4	9	Running Sequence Number for each line in the file starting from 1. This Number will be used during validation checks.
3	CTR Reference Number *	NUM	8	10	17	Indicates the running unique sequence number of CTR for the reporting entity. There should be matching value of [CTR Reference Number] in CAPCTL.txt
4	Report Date*	DATE	10	18	27	Date of sending report in YYYY-MM-DD Format. This date should be same as in control file
5	Institution Name*	CHAR	80	28	107	Name of Institution which has issued the payment instrument/card
6	Institution Reference Number*	CHAR	12	108	119	Unique Code issued by the regulator/association or any temporary code for the institution
7	Payment Instrument Reference Number*	CHAR	20	120	139	Unique Number of the payment instrument/card
8	Payment Instrument Type*	CHAR	1	140	140	“G”- Credit Card “H”- Debit Card “I”- Smart Card “J”- Prepaid Card “K”- Gift Card “Z”- Others
9	Payment Instrument Holder Name	CHAR	80	141	220	Name of Person to whom the payment instrument was issued
10	Relationship Beginning Date	DATE	10	221	230	Date of issue of payment instrument in YYYY-MM-DD Format
11	Risk Category	CHAR	1	231	231	Risk Category as per the Internal Risk Assessment “A”- Low Risk “B”- Medium Risk “C”- High Risk
12	Cumulative Purchase Turnover	NUM	20	232	251	Sum of all purchases in the payment Instrument /card from 1 st April of the financial year till the last day of the month of reporting. If report is being

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

						furnished for Jan 2009 then transactions from 1 st April 2008 to 31 st Jan 2009 have to be aggregated. The amount should be rounded off to nearest rupee without decimal.
13	Payment Instrument Remarks	CHAR	30	252	281	Any remark in respect of the payment Instrument/ card

Data structure of Individual File (SBAINP.txt)

23. The Individual file contains information about individual(s) related to the Cash Transactions. The reporting entities are required to submit information in the Individual File (CAPINP.txt), if the information therein is available with the reporting entity, and not covered in the Transaction File (CAPTRN.txt)

S. No.	Field	Type	Size	From	To	Remarks
1	Record Type*	CHAR	3	1	3	Value should be "INP" signifying Individual data file
2	Line Number*	NUM	6	4	9	Running Sequence Number for each line in the file starting from 1. This Number will be used during validation checks.
3	CTR Reference Number *	NUM	8	10	17	Indicates the running unique sequence number of CTR for the reporting entity. There should be matching value of [CTR Reference Number] in CAPCTL.txt
4	Report Date*	DATE	10	18	27	Date of sending report in YYYY-MM-DD Format. This date should be same as in control file
5	Relation Flag*	CHAR	80	28	107	Indicates the relation of Individual with the reported transactions. "A"- Customer "B"- Authorised Signatory of a Legal Person /Entity Customer

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

S. No.	Field	Type	Size	From	To	Remarks
						“C”- Director/ Partner/Member etc. of a Legal Person /Entity Customer “D”- Introducer “E”- Guarantor “Z” - Other
6	Individual Name*	CHAR	12	108	119	Full Name Field + filler spaces = 80
7	Customer Reference Number	CHAR	1	120	120	Any unique reference number to identify the customer. This customer number can be temporarily allotted to enable linkage of transactions details with the individual.
8	Establishing Relationship Date	DATE	20	121	140	Date since when the reporting entity has relationship with the customer. In YYYY-MM- DD format
9	Father/Spouse Name	CHAR	80	141	220	Full Name of Father/Spouse Field + filler spaces = 80
10	Occupation	CHAR	1	221	221	Occupation
11	Date of Birth	DATE	10	222	231	In YYYY-MM-DD format
12	Sex	CHAR	10	232	241	“M”- Male “F”- Female
13	Nationality	CHAR	1	242	242	Country code as per SWIFT
14	ID Type	CHAR	20	243	262	“A” –Passport “B”- Election ID Card “C”- PAN Card “D”- ID Card “E”- Driving License “Z” – Other
15	ID Number	CHAR	20	263	282	Number mentioned in the identification document
16	ID Issuing Authority	CHAR	20	283	302	Authority which had issued the identification document
17	ID Issue Place	CHAR	20	303	322	Place where document was issued
18	PAN	CHAR	3	323	325	Ten Digit PAN used by Income Tax Department
19	Communication Address*	CHAR	225	326	550	Complete Address

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

S. No.	Field	Type	Size	From	To	Remarks
20	Communication City	CHAR	50	551	600	City/Town
21	Communication Address Pin code/ZIP code*	NUM	1	601	601	Pin code or ZIP code
22	Communication Country Code	CHAR	20	602	621	Country Code for the communication address as Per SWIFT. Use IN for India
23	Contact Telephone	CHAR	80	622	701	Telephone number in format STD Code-Telephone number
24	Contact Mobile number	CHAR	1	702	702	Mobile number
25	Contact E-mail	CHAR	10	703	712	E-mail address
26	Place of Work	CHAR	10	713	722	Name of Organisation/ employer
27	Number of purchase transactions	NUM	1	723	723	Count of number of purchase transactions in the CTR related to the individual (records in CAPTRN.txt with Transaction Type = "P")
28	Value of purchase transactions	NUM	20	724	743	Sum of amount of purchase transactions in the CTR related to the individual
29	Number of redemption transactions	NUM	20	744	763	Count of number of redemption transactions in the CTR related to the individual (records in CAPTRN.txt with Transaction Type = "R")
30	Value of redemption transactions	NUM	20	764	783	Sum of amount of redemption transactions in the CTR related to the individual
31	Individual Remarks	CHAR	30	784	813	Remarks specific to individual

Data structure of Legal Person/Entity File (SBALPE.txt)

24. The Legal Person/Entity file contains information about legal person/entity(s) related to the Cash Transactions. The reporting entities are also required to submit information in the Legal Person/Entity File (CAPLPE.txt), if the information therein is available with the reporting entity, and not covered in the Transaction File (CAPTRN.txt)

S. No.	Field	Type	Size	From	To	Remarks
--------	-------	------	------	------	----	---------

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

S. No.	Field	Type	Size	From	To	Remarks
1	Record Type*	CHAR	3	1	3	Value should be "LPE" signifying Legal Persons/ Entity data file
2	Line Number*	NUM	6	4	9	Running Sequence Number for each line in the file starting from 1. This Number will be used during validation checks.
3	CTR Reference Number *	NUM	8	10	17	Indicates the running unique sequence number of CTR for the reporting entity. There should be matching value of [CTR Reference Number] in CAPCTL.txt
4	Report Date*	DATE	10	18	27	Date of sending report in YYYY-MM-DD Format. This date should be same as in control file
5	Relation Flag*	CHAR	1	28	28	Indicates the relation of the legal person/entity with the reported transactions "A"- Customer "D"- Introducer "E"- Guarantor "Z" - Other
6	Legal Person /Entity Name *	CHAR	80	29	108	Full Name Field + filler spaces = 80
7	Customer Reference Number	CHAR	10	109	118	Any unique reference number to identify the customer. This customer number can be temporarily allotted to enable linkage of transactions details with the legal person/entity.
8	Relationship Establishing Date	DATE	10	119	128	Date since when the reporting entity has relationship with the customer. In YYYY-MM-DD format
9	Nature of Business	CHAR	50	129	178	Nature of Business
10	Date of Incorporation	DATE	10	179	188	In YYYY-MM-DD format
11	Constitution Type *	CHAR	1	189	189	"A"- Sole Proprietorship "B"- Firm "C"- HUF

S. No.	Field	Type	Size	From	To	Remarks
						“D”- Private Ltd. Company “E”- Public Ltd. Company “F”- Society “G”- Association “H”- Trust “I”- Liquidator “Z”- Other
12	Registration Number	CHAR	20	190	209	Registration Number of mentioned in deed/document
13	Registering authority	CHAR	20	210	229	Authority Registering deed/document
14	Registration Place	CHAR	20	230	249	Place where the document was registered
15	Country Code	CHAR	2	250	251	Country code for the country of incorporation as per SWIFT
16	PAN	CHAR	10	252	261	Ten Digit PAN used by Income Tax Department
17	Communication Address*	CHAR	225	262	486	Complete Address
18	Communication City	CHAR	50	487	536	City/Town
19	Communication Address Pin code/ZIP code*	NUM	10	537	546	Pin code or ZIP code
20	Communication Country Code	CHAR	2	547	548	Country Code for the communication address as Per SWIFT. Use IN for India
21	Contact Telephone	CHAR	30	549	578	Telephone number in format STD Code-Telephone number
22	Contact Fax	CHAR	30	579	608	Fax number in format STD Code-Telephone number
23	Contact Email	CHAR	50	609	658	E-mail address
24	Number of purchase transactions	NUM	20	659	678	Count of number of purchase transactions in the CTR related to the legal person/entity (records in CAPTRN.txt with Transaction Type = “P”)
25	Value of purchase transactions	NUM	20	679	698	Sum of amount of purchase transactions in the CTR related to the legal person/entity

S. No.	Field	Type	Size	From	To	Remarks
26	Number of redemption transactions	NUM	20	699	718	Count of number of redemption transactions in the CTR related to the legal person/entity (records in CAPTRN.txt with Transaction Type = "R")
27	Value of redemption transactions	NUM	20	719	738	Sum of amount of redemption transactions in the CTR related to the legal person/entity
28	Legal Person/Entity Remarks	CHAR	30	739	768	Remarks specific to legal person/entity

List of State codes

25. The codes for state/UT as per the Motor Vehicles Act 1988.

S. No.	Name of State/UT	Code
1	Andaman & Nicobar	AN
2	Andhra Pradesh	AP
3	Arunachal Pradesh	AR
4	Assam	AS
5	Bihar	BR
6	Chandigarh	CH
7	Chattisgarh	CG
8	Dadra and Nagar Haveli	DN
9	Daman & Diu	DD
10	Delhi	DL
11	Goa	GA
12	Gujarat	GJ
13	Haryana	HR
14	Himachal Pradesh	HP
15	Jammu & Kashmir	JK
16	Jharkhand	JH
17	Karnataka	KA
18	Kerala	KL
19	Lakshadweep	LD
20	Madhya Pradesh	MP
21	Maharashtra	MH
22	Manipur	MN
23	Meghalaya	ML
24	Mizoram	MZ
25	Nagaland	NL
26	Orissa	OR

<i>Report</i> CASH TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------	------------------------------------------------------------------------	-----------------------

S. No.	Name of State/UT	Code
27	Pondicherry	PY
28	Punjab	PB
29	Rajasthan	RJ
30	Sikkim	SK
31	Tamil Nadu	TN
32	Tripura	TR
33	Uttar Pradesh	UP
34	Uttarakhand	UA
35	West Bengal	WB

BRANCH DETAIL SHEET FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR

ANNEXURE

1. Name of Reporting Entity
2. Reporting Role
3. Institution Relation Flag
4. Institution Name
5. Institution Branch Name
6. Institution Reference Number
7. Branch Address
8. Branch City
9. Pin code
10. Country Code
11. Telephone
12. Fax
13. E-mail
14. Branch Remarks

INSTRUCTIONS

As there could be more than one branch/location relevant to the STR, appropriate details should be provided in separate sheet.

2. Reporting Role:

- “A”-Reporting Entity itself
- “B”- Other Than Reporting Entity

3. Institution Relation Flag:

- “A”- Transaction Institution (Institution where transaction was conducted)
- “B”- Instrument Issue Institution (Institution where instrument/card was issued)
- “C”- Account with Institution (Institution having Account)
- “D”- Sending Institution (SWIFT)
- “E”-Ordering Institution (SWIFT)
- “F”- Intermediary Institution (SWIFT)
- “G”- Correspondent Institution (SWIFT)
- “H”-Acquirer Institution (Card)
- “M”- Multiple Relationships
- “Z”- Others

4. Institution Name: Name of Institution relevant to the transactions.

5. Institution Branch Name: Name of the branch/location relevant to the transactions.

10. Country Code: Country Code for the branch as Per SWIFT. Use IN for India

14. Branch Remarks: Any remark in respect of the branch/location

**INDIVIDUAL DETAIL SHEET FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR
ANNEXURE**

- | | |
|-----------------------------------|--------------------|
| 1. Name of Reporting Entity | |
| 2. Relation Flag | |
| 3. Individual Name | |
| 4. Customer Reference Number | |
| 5. Establishing Relationship Date | |
| 6. Father/Spouse Name | |
| 7. Occupation | |
| 8. Date of Birth | 9. Sex |
| 10. Nationality | |
| 11. ID Type | 12. ID Number |
| 13. ID Issuing Authority | 14. ID Issue Place |
| 15. PAN | |
| 16. Communication Address | |
| 17. City | |
| 18. Pin code | |
| 19. Communication Country Code | |
| 20. Telephone | 21. Mobile |
| 22. E-mail | |
| 23. Place of Work | |
| 24. Individual Remarks | |

INSTRUCTIONS

- | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2. Relation Flag: Indicates the relation of Individual with the reported transactions.
"A"- Customer
"B"- Authorised Signatory of a Legal Person /Entity Customer
"C"- Director/ Partner/Member etc. of a Legal Person /Entity Customer
"D"- Introducer
"E"- Guarantor
"Z" – Other | 9. Sex:"M"- Male, "F"- Female
10. Nationality: Country code as per SWIFT
11. ID Type:
"A" –Passport
"B"- Election ID Card
"C"- PAN Card
"D"- ID Card
"E"- Driving License
"Z" – Other |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

LEGAL PERSON/ENTITY DETAIL SHEET FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR

ANNEXURE

<p>1. Legal Person /Entity Name</p> <p>2. Relation Flag</p> <p>3. Customer Reference Number</p> <p>4. Relationship Establishing Date</p> <p>5. Nature of Business</p> <p>6. Date of Incorporation</p> <p>8. Registration Number</p> <p>9. Registering authority</p> <p>11. Country Code</p> <p>12. PAN</p> <p>13. Communication Address</p> <p>14. City</p> <p>15. Pin code</p> <p>17. Telephone</p> <p>19. Email</p> <p>20. List of Directors/partners/members and other related persons</p> <p>20.1</p> <p>20.2</p> <p>20.3</p> <p>21. Legal Person/Entity Remarks</p>	<p>7. Constitution Type</p> <p>10. Registration Place</p> <p>16. Country Code</p> <p>18. Fax</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------

INSTRUCTIONS

2. Relation Flag:
Indicates the relation of the legal person/entity with the reported transactions

- “A”- Customer
- “D”- Introducer
- “E”- Guarantor
- “Z” - Other

7. Constitution Type:

- | | |
|---------------------------|------------------|
| “A”- Sole Proprietorship | “F”- Society |
| “B”- Firm | “G”- Association |
| “C”- HUF | “H”- Trust |
| “D”- Private Ltd. Company | “I”- Liquidator |
| “E”- Public Ltd. Company | “Z”- Other |

11. Country Code: Country code for the country of incorporation as per SWIFT

**PAYMENT INSTRUMENT DETAIL SHEET FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR
ANNEXURE**

1. Name of Reporting Entity
2. Institution Name
3. Institution Reference Number
4. Payment Instrument Reference Number
5. Payment Instrument Type
6. Payment Instrument Holder Name
7. Relationship Beginning Date
8. Risk Category
9. Cumulative Purchase Turnover
10. Payment Instrument Remarks

INSTRUCTIONS

- | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>2. Institution Name: Name of Institution which has issued the payment instrument/card</p> <p>3. Institution Reference Number: Unique Code issued by the regulator/association or any temporary code for the institution</p> <p>4. Payment Instrument Reference Number: Unique Number of the payment instrument/card</p> <p>5. Payment Instrument Type:</p> <p> "G"- Credit Card
 "H"- Debit Card
 "I"- Smart Card
 "J"- Prepaid Card
 "K"- Gift Card
 "Z"- Others</p> <p>6. Payment Instrument Holder Name: Name of Person to whom the payment instrument was issued</p> | <p>7. Relationship Beginning Date: Date of issue of payment instrument in YYYY-MM-DD Format</p> <p>8. Risk Category: Risk Category as per the Internal Risk Assessment</p> <p> "A"- Low Risk
 "B"- Medium Risk
 "C"- High Risk</p> <p>9. Cumulative Purchase Turnover: Sum of all purchases in the payment Instrument /card from 1st April of the financial year till the last day of the month of reporting. If report is being furnished for Jan 2009 then transactions from 1st April 2008 to 31st Jan 2009 have to be aggregated. The amount should be rounded off to nearest rupee without decimal.</p> <p>10. Payment Instrument Remarks: Any remark in respect of the payment Instrument/ card</p> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

TRANSACTION DETAIL SHEET FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR*Read the instructions before filling the form* **ANNEXURE**

1. Name of Reporting Entity
2. Transaction Reference Number
3. Transaction Type
4. Transaction Date
5. Transaction Time
6. Instrument Type
7. Transaction Institution Name
8. Amount in Rupees
9. Currency of Transaction
10. Purpose of transaction
11. Payment Mode

Payment Instrument Details

12. Payment Instrument Number
13. Payment Instrument Issue Institution Name

Customer Details

14. Customer Name
15. Occupation
16. Date of Birth
17. Sex
18. Nationality
19. ID Type
20. ID Number
21. ID Issuing Authority
22. ID Issue Place
23. PAN
24. Address
25. City
26. Pin code
27. Country code
28. Telephone
29. Mobile number
30. E-mail

Additional Information

31. Account Number
32. Account With Institution Name
33. Related Institution Name
34. Institution Relation Flag
35. Transaction Remarks

TRANSACTION DETAIL SHEET FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR**INSTRUCTIONS**

2. Transaction Reference Number: Unique Reference Number for the transaction maintained by the reporting entity to uniquely refer to a transaction. In cases, where the reporting entity is reporting two (or more) transactions intrinsically linked to each other (money transfer sent and received), both the records should have common Transaction Reference Number to depict the complete transaction

3. Transaction Type: "P" – Purchase/Send transfer
"R" – Redemption/Receive transfer

6. Instrument Type:

"A"- Currency Note	"G"- Credit Card
"B"- Travelers Cheque	"H"- Debit Card
"C"- Demand Draft	"I"- Smart Card
"D"- Money Order	"J"- Prepaid Card
"E"-Wire Transfers/TT	"K"- Gift Card
"F"- Money Transfer	"Z"- Others

7. Transaction Institution Name: Name of the financial institution where transaction was conducted.

8. Amount in Rupees: The amount should be rounded off to nearest rupee without decimal. If this amount was not in Indian Rupees, it should be converted into Indian rupees.

9. Currency of Transaction: Mention Currency code as per SWIFT Code. "INR" for Indian Rupees

10. Purpose of transaction: Mention text to define the purpose (such as Private Visit, Visa fees)

11. Payment Mode: The mode of payment made against purchase/redemption

"A"- Cheque
"B"- Account Transfer
"C"- Cash
"D"-Demand Draft
"E"- Electronic Fund Transfer
"Z"- Others

12. Payment Instrument Number: Instrument number such as Card Number used in transaction. (if available)

13. Payment Instrument Issue Institution Name: Name of the financial institution issuing the instrument

14. Customer Name: Full Name of the customer/sender/receiver.

17. Sex: "M"- Male, "F"- Female

18. Nationality: Country code as per SWIFT. Use IN for India

19. ID Type:

"A" –Passport
"B"- Election ID Card
"C"- PAN Card
"D"- ID Card
"E"- Driving License
"Z" – Other

20. ID Number: Number mentioned in the identification document

21. ID Issuing Authority: Authority which had issued the identification document

22. ID Issue Place: Place where document was issued

27. Country Code: Country Code for the address as Per SWIFT. Use IN for India

31. Account Number: Account number, if linked to the transaction

32. Account With Institution Name: Name of the financial institution having the account linked to the transaction.

33. Related Institution Name: Name of the financial institution having the account linked to the transaction.

34. Institution Relation Flag:

"D"- Sending Institution (SWIFT)
"E"-Ordering Institution (SWIFT)
"F"- Intermediary Institution (SWIFT)
"G"- Correspondent Institution (SWIFT)
"H"-Acquirer Institution (Card)
"Z"- Others

35. Transaction Remarks: Any remark in respect of the transaction

SUSPICIOUS TRANSACTION REPORT FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR

Read the instructions before filling the form

PART 1 DETAILS OF REPORT

1.1 Date of sending report

1.2 Is this a replacement of earlier report Yes No

1.3 Date of sending original report if this is a replacement report

PART 2 DETAILS OF PRINCIPAL OFFICER

2.1 Name of Reporting Entity

2.2 Reporting Entity Category

2.3 Reporting Entity Code

2.4 Reporting Entity FIU ID

2.5 Name of Principal Officer

2.6 Designation of Principal Officer

2.7 Address of Principal Officer

2.8 City

2.9 Country

2.10 Pincode

2.11 Telephone

2.12 Fax

2.13 Email

PART 3 LIST OF TRANSACTIONS

Date	Purchase/ Redemption	Instrument Type	Currency of Transaction	Amount in Rupees	Annexure No.
3.1					
3.2					
3.3					
3.4					
3.5					
3.6					
3.7					
3.8					
3.9					
3.10					
3.11					
3.12					
3.13					
3.14					
3.15					

Total Amount in suspicious transactions

(Details of all transactions should be furnished in the prescribed Transaction Detail Sheet as Annexure)

Number of additional PART 3 sheets attached

(Leave blank if no extra sheet is attached)

SUSPICIOUS TRANSACTION REPORT FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR

Read the instructions before filling the form

PART 4 LIST OF BRANCHES/LOCATIONS RELATED TO TRANSACTIONS

Name of Institution	Branch Name	Annexure No.
4.1		
4.2		
4.3		
4.4		
4.5		

(Details of all transactions should be furnished in the prescribed Branch/Location Detail Sheet as Annexure)
 Number of additional PART 4 sheets attached *(Leave blank if no extra sheet is attached)*

PART 5 LIST OF PAYMENT INSTRUMENTS RELATED TO TRANSACTIONS

Payment Instrument Type	Instrument Number	Annexure No.
5.1		
5.2		
5.3		
5.4		
5.5		

(Details of all payment instruments should be furnished in the prescribed Payment Instrument Detail Sheet as Annexure)
 Number of additional PART 5 sheets attached *(Leave blank if no extra sheet is attached)*

PART 6 LIST OF INDIVIDUALS RELATED TO TRANSACTIONS

Name of Individual(s)	Date of Birth	Annexure No.
6.1		
6.2		
6.3		
6.4		
6.5		

(Details of all individuals should be furnished in the prescribed Individual Detail Sheet as Annexure)
 Number of additional PART 6 sheets attached *(Leave blank if no extra sheet is attached)*

PART 7 LIST OF LEGAL PERSONS/ ENTITIES RELATED TO TRANSACTIONS

Name of Legal Person(s)/Entity(s)	Annexure No.
7.1	
7.2	
7.3	
7.4	
7.5	

(Details of all legal persons/entities should be furnished in the prescribed Legal Person/Entity Detail Sheet as Annexure)
 Number of additional PART 7 sheets attached *(Leave blank if no extra sheet is attached)*

SUSPICIOUS TRANSACTION REPORT FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR

Read the instructions before filling the form

PART 8 DETAILS OF SUSPICION

8.1 Type of Suspicion Proceeds of Crime Unusual or complex transactions No economic rationale or bonafide purpose Financing of Terrorism

8.2 Grounds of Suspicion (Mention summary of suspicion and sequence of events)

8.3 Priority Rating Normal High Very High

8.4 Report Coverage Complete Partial

Number of additional PART 8 sheets attached *(Leave blank if no extra sheet is attached)*

PART 9 DETAILS OF ACTION TAKEN

9.1 Whether the matter is/was under any investigation *(Mention the name of the agency, person and contact details)*

Number of additional PART 9 sheets attached *(Leave blank if no extra sheet is attached)*

Signature

Name
 (Should be same as the person mentioned in PART 2)

SUSPICIOUS TRANSACTION REPORT FOR AUTHORISED PERSON AND PAYMENT SYSTEM OPERATOR**INSTRUCTIONS****GENERAL INSTRUCTIONS****The Prevention of Money-Laundering Act**

The Prevention of Money-Laundering (Amendment) Act, 2009 has included 'Authorized Persons' and 'Payment System Operators' in the category of 'financial institutions'.

"Authorized Person" under the PMLA means 'authorized person' as defined in clause (c) of section 2 of the Foreign Exchange Management Act, 1999 (FEMA).

"Payment System Operator" has been defined under the PMLA as a person who operates a payment system. "Payment system" has been defined to mean a system that enables payment to be effected between a payer and a beneficiary involving clearing, payment or settlement service or all of them and includes the systems enabling credit card operations, debit card operations, smart card operations, money transfer operations or similar operations.

Suspicious Transaction Reports

The Prevention of Money laundering Act and the Rules there under requires every reporting entity to furnish details of suspicious transactions whether or not made in cash. Suspicious transaction as defined under Rule 2(1)(g) means a transaction whether or not made in cash which, to a person acting in good faith –

- gives rise to a reasonable ground of suspicion that it may involve the proceeds of crime; or
- appears to be made in circumstances of unusual or unjustified complexity; or
- appears to have no economic rationale or bona fide purpose; or
- gives rise to a reasonable ground of suspicion that it may involve financing of the activities relating to terrorism.

How to Submit

The STR should be submitted to the Financial Intelligence Unit – India (FIU-IND) at the following address:

Director, FIU-IND
Financial Intelligence Unit-India
6th Floor, Hotel Samrat
Chanakyapuri, New Delhi -110021, India
(Visit <http://fiuindia.gov.in> for more details)

Due Date

The principal officer is required to furnish the information of the suspicious transactions to Director, FIU-IND not later than seven working days on being satisfied that the transaction is suspicious.

EXPLANATION OF SPECIFIC TERMS**PART1:DETAILS OF REPORT**

1.1. Date of sending report is the date on which the principal officer sends the report to Director (FIU-IND).

1.2. Replacement report is a report submitted in replacement of an earlier STR. When a replacement report is submitted, date of submitting original STR may be mentioned and the complete STR has to be submitted again.

PART 2: DETAILS OF PRINCIPAL OFFICER**2.2 Reporting Entity Category**

- "A"- Authorized Dealer – Category I
- "B"- Authorized Dealer- Category II
- "C"- Authorized Dealer- Category III
- "D"- Full Fledged Money Changers
- "E"-Payment System Provider
- "F"- Payment System Participant
- "Z"- Others

2.3 Unique code issued by the regulator/association to identify reporting entity. If the code is not available, this field may be left blank.

2.4. Reporting Entity FIU ID may be left blank till the same is communicated by FIU-IND.

PART 3: LIST OF TRANSACTIONS**Purchase/Redemption**

- "P" – Purchase/Send transfer
- "R" – Redemption/Receive transfer

Instrument Type

- | | |
|-----------------------|-------------------|
| "A"- Currency Note | "G"- Credit Card |
| "B"- Travelers Cheque | "H"- Debit Card |
| "C"- Demand Draft | "I"- Smart Card |
| "D"- Money Order | "J"- Prepaid Card |
| "E"-Wire Transfers/TT | "K"- Gift Card |
| "F"- Money Transfer | "Z"- Others |

Currency of Transaction: Mention Currency code as per SWIFT Code. "INR" for Indian Rupees

PART 4, 5, 6 and 7

All reporting entities are required to submit details of each transaction and branch in separate 'Transaction Detail Sheet' and 'Branch Detail Sheet' respectively. Information about payment instruments, individuals and Legal Person/Entity is also required to be submitted if the information therein is:

- relevant to the suspicion reported,
- available with the reporting entity, and
- not covered in the 'Transaction Detail Sheet'

PART 8 : DETAILS OF SUSPICION

8.1 Examples of sample indicators for detection of suspicious transactions are given in the document containing electronic reporting format

8.2 Grounds of Suspicion : Write summary of suspicion and sequence of events covering following aspects:

- How was suspicion detected?
- What information was collected during the review process?
- What explanation was provided by the subject(s) or other persons (without tipping off)?
- Who benefited, financially or otherwise, from the transaction(s), how much, and how (if known)?
- Whether the suspicious activity is an isolated incident or relates to another transaction?
- Any further investigation that might assist law enforcement authorities.

8.3 Priority attached to the report as per assessment of the reporting entity

8.4 Whether partial or complete transactions are reported in the STR.

Report | **SUSPICIOUS TRANSACTION REPORT**
Reporting Entity | **Authorized Person and Payment System Operator**
Version | **1.0**

Contents

Introduction	1
Amendment to the Prevention of Money laundering Act.....	1
Suspicious Transaction Report.....	1
Due Date.....	6
Methods of filing.....	6
Manual format	7
Electronic format.....	7
Steps in preparation of data files	8
Steps in validation/sufficiency of data files.....	9
General notes for all Data Files	10
Data structure of Control File (SAPCTL.txt)	11
Data structure of Transaction File (SAPTRN.txt).....	17
Data structure of Branch File (SAPBRC.txt)	24
Data structure of Payment Instrument File (SAPPIN.txt)	27
Data structure of Individual File (SBAINP.txt).....	29
Data structure of Legal Person/Entity File (SBALPE.txt)	32
List of State codes	35

Appendix

Suspicious Transaction Report
Transaction Detail Sheet
Branch Detail Sheet
Instrument Detail Sheet
Individual Detail Sheet
Legal Person/Entity Detail Sheet

<i>Report</i> SUSPICIOUS TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------------	------------------------------------------------------------------------	-----------------------

Introduction

1. The Prevention of Money Laundering Act (PMLA) forms the core of the legal framework put in place by India to combat money laundering. PMLA and the Rules notified there under impose an obligation on banking companies, financial institutions and intermediaries of the securities market to verify identity of clients, maintain records and furnish information to the Financial Intelligence Unit – India.

2. Financial Intelligence Unit – India (FIU-IND) has been established as the central national agency responsible for receiving, processing, analyzing and disseminating information relating to suspect financial transactions. FIU-IND is also responsible for coordinating and strengthening efforts of national and international intelligence and enforcement agencies in pursuing the global efforts against money laundering and related crimes. Director, FIU-IND and Director (Enforcement) have been conferred with exclusive and concurrent powers under relevant sections to implement the provisions of the Act.

Amendment to the Prevention of Money laundering Act

3. The Prevention of Money-Laundering (Amendment) Act, 2009 has included ‘Authorized Persons’ and ‘Payment System Operators’ in the category of ‘financial institutions’.

4. “Authorized Person” under the PMLA means ‘authorized person’ as defined in clause (c) of section 2 of the Foreign Exchange Management Act, 1999 (FEMA). As per Section 2 (c) of FEMA, Authorized Person means an Authorized Dealer, money changer, off-shore banking unit or any other person for the time being authorized under sub-section (1) of section 10 of FEMA to deal in foreign exchange or foreign securities. As per RBI circular dated 6.3.2006, Authorized Persons broadly cover four categories of entities – Authorized Dealer - Category I (AD-I), Authorized Dealer- Category II (AD-II), Authorized Dealer – Category III (AD-III) and Full Fledged Money Changers (FFMCs).

5. “Payment System Operator” has been defined under the PMLA as a person who operates a payment system. “Payment system” has been defined to mean a system that enables payment to be effected between a payer and a beneficiary involving clearing, payment or settlement service or all of them and includes the systems enabling credit card operations, debit card operations, smart card operations, money transfer operations or similar operations.

Suspicious Transaction Report

6. The Prevention of Money laundering Act and the Rules there under require every reporting entity to furnish details of suspicious transactions whether or not made in cash. Suspicious transaction as defined under Rule 2(1)(g) means a transaction whether or not made in cash which, to a person acting in good faith –

- a) gives rise to a reasonable ground of suspicion that it may involve the proceeds of crime; or
- b) appears to be made in circumstances of unusual or unjustified complexity; or
- c) appears to have no economic rationale or bona fide purpose; or
- d) gives rise to a reasonable ground of suspicion that it may involve financing of the activities relating to terrorism.

7. Indicators are circumstances that indicate suspicious nature of transactions. Suspicious transaction may result from one indicator or a set of indicators. Examples of sample indicators for detection of suspicious transactions for authorized persons and payment system operators are as under:

Type of suspicion	Sample indicators for detection of suspicious transactions
Suspicion of proceeds of crime	<p>General</p> <ul style="list-style-type: none"> • Match of customer details with known criminals or persons with suspicious background. • Customer has been the subject of a law enforcement inquiry. • Customer who conducts transactions in a pattern consistent with criminal proceeds, e.g. in amounts consistent with a lottery scam, illegal immigration. • Transaction involving a jurisdiction/area considered to be high risk from the money laundering or drug trafficking perspective.
Suspicion due to unusual or complex transactions	<p>General</p> <ul style="list-style-type: none"> • Transaction is unnecessarily complex for its stated purpose. • Unusual single or aggregate transfers in single/multiple days. • Transaction is inconsistent with financial standing or occupation, or is outside the normal course of business for the customer in light of the information provided by the customer when conducting the transaction or during subsequent contact with the customer. • Routing of transfer through multiple locations. • Multiple related transactions which are split to just below maximum cash limit or reporting requirements. • The amounts or frequency or the stated reason of the transaction does not make sense for the particular customer. <p>Money Transfer</p> <ul style="list-style-type: none"> • Unrelated sender/receiver. • Unexplained electronic funds transfers by client on an in-and-out basis • Migrant remittances made outside the usual remittance corridors. • Personal funds sent at a time not associated with salary payments. • Large number of transfers received at once or over a certain period of time which are much greater than what would be expected for such a receiver.

Type of suspicion	Sample indicators for detection of suspicious transactions
Suspicion due to no economic rationale or bonafide purpose	<p>General</p> <ul style="list-style-type: none"> • The volume or frequency of transactions have no economic rationale or lawful purpose. • Customer who travels unexplained distances to conduct transactions. • Customer who offers false identification, whether evident from the document alone, from the document's lack of connection to the customer, or from the document's context with other documents (e.g., use of identification cards issued by different countries). • Common Unique IDs used by multiple customers. • Common address/telephone used by multiple unrelated receivers. • Customer conducts multiple cash transactions in a single day. <p>Behavioural</p> <ul style="list-style-type: none"> • Customer is hurried, nervous or evasive. • Customer has vague knowledge about amount of money involved in the transaction. • Customer is accompanied by unrelated individuals. • Multiple customers entered together, then ignore each other. • Suspicion that the customer is acting on behalf of a third party but not disclosing that information. • Customer provides information that seems minimal, possibly false or inconsistent. • Customer changes the information provided after more detailed information is requested. • Customer is reluctant to go forward with a transaction after being informed that identification information will be required. • Customer is reluctant to provide original ID. • Customer makes inquiries or tries to convince staff to avoid reporting. • Customer who offers different identifications or different identifiers (such as phone or address) on different occasions with an apparent attempt to avoid linkage of multiple transactions.

Type of suspicion	Sample indicators for detection of suspicious transactions
	<p>Money Transfer</p> <ul style="list-style-type: none"> • Customer orders wire transfers in small amounts in an apparent effort to avoid triggering identification or reporting requirements. • Customer requests payment in cash immediately upon receipt of a large funds transfer. • Customer knows little or is reluctant to disclose details about the remitter/beneficiary (address/contact info, etc). • Customer is reluctant to give an explanation for the remittance. • Customer requests transfers to a large number of recipients who do not appear to be family members. • Transfer from multiple persons to one person with no apparent business or lawful purpose. • Transfer from one persons to multiple persons with no apparent business or lawful purpose. • Two or more individuals, who appear to be acting together, receive separate cash transactions • Same customer collecting money from multiple locations across cities. • Different customers request transfers that are all paid for by the same customer. • A customer sends or receives multiple transfers to or from the same individual. • Several different customers send transfers that are similar in amounts, sender names, test questions, free message text and destination country. • Customer receives funds transfers and immediately purchases monetary instruments prepared for payment to a third party which is inconsistent with or outside the normal course of business for the customer. • Immediately after transferred funds have cleared, the customer moves the funds to another account or to another individual or entity. • Stated occupation of the customer or the customer’s financial standing is not in keeping with the level or type of activity (for example a student or an unemployed individual who receives or sends large numbers of wire transfers). • Rising volume of remittances exceeds what was expected from the customer when the relationship was established.

Type of suspicion	Sample indicators for detection of suspicious transactions
	<p>Money Exchange</p> <ul style="list-style-type: none"> • Customer requests that a large amount of foreign currency be exchanged to another foreign currency. • Frequent requests for traveller’s cheques, foreign currency drafts or other negotiable instruments. • Customer makes large purchases of traveller’s cheques not consistent with known travel plans. • Customer wants to exchange cash for numerous instruments in small amounts for numerous other parties. <p>Card Operations</p> <ul style="list-style-type: none"> • Frequent changes of address. • Change of address to high-fraud area or to problematic jurisdiction, shortly after the card issuance or credit line increase. • Frequent and unusual use of the card for withdrawing cash at ATMs. • Unusual cash advance activity and large cash payments. • Purchases at merchant on personal cards which are significantly out of pattern with historical spending behavior. • Merchant credits without offsetting merchant transactions. • Multiple and frequent cash payment or money orders; large, cross-border wire transfer payments. • Unrelated checking/current account paying multiple credit card accounts. • The customer opens Internet account in one country but logs in regularly on the website from a single or multiple third countries. • The customer starts to purchase items for amounts not in line with his previous transactions profile. • The customer loads his card or makes payment in cash which is not consistent with the profile of the customer. • The customer account or card has funds transfers from a third party apparently not related to the customer. • The transactions of the customer suddenly deviate from its previous transactions profile after his customer account had been loaded with money from a third party. • Use of cards, particularly prepaid, issued in a foreign country. • The customer purchases items of high value on a regular basis with a card where the origin of the funds is difficult to retrace (prepaid debit card,

Type of suspicion	Sample indicators for detection of suspicious transactions
	<p>anonymous prepaid credit card, gift card etc.).</p> <ul style="list-style-type: none"> • The purchased goods are regularly shipped to a foreign country. • The buyer requests that the goods be delivered to a post office box or to a different address from the one registered to the account. • Customer requests the balance from account/card to be transferred to a third party without apparent relation with him. • The country of origin of the customer or the card issuing institution is an offshore centre or a high risk jurisdiction from money laundering perspective.
Suspicion of financing of terrorism	<p>General</p> <ul style="list-style-type: none"> • Match of customer details with known terrorists or persons linked with terrorist organizations. • Customer who receives transactions in a pattern consistent with financing of terrorism. • Transaction involving a jurisdiction/area considered to be high risk from the terrorist financing perspective.

Due Date

8. Rule 8 of the Rules require the principal officer to furnish the information of the suspicious transactions to Director, FIU-IND not later than seven working days on being satisfied that the transaction is suspicious

Methods of filing

9. The STR should be submitted to the Financial Intelligence Unit – India (FIU-IND) at the following address:

Director, FIU-IND
Financial Intelligence Unit-India
6th Floor, Hotel Samrat
Chanakyapuri, New Delhi -110021, India
(Visit <http://fiuindia.gov.in> for more details)

10. Reports can be filed either in manual or electronic format. However, the reporting entity must submit all reports to FIU-IND in electronic format if it has the technical capability to do so.

<i>Report</i> SUSPICIOUS TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------------	------------------------------------------------------------------------	-----------------------

Manual format

11. Suspicious Transaction Report for authorized person and payment system operator in manual format consists of following forms (given in the Appendix).

Form	Information
Suspicious Transaction Report	Summary of suspicion and details of reporting institution
Transaction Detail Sheet	Details of transactions
Branch Detail Sheet	Details of location/branches related to the transactions
Instrument Detail Sheet	Details of payment instruments related to the transactions
Individual Detail Sheet	Details of individuals related to the transactions
Legal Person/Entity Detail Sheet	Details of legal persons/entities related to the transactions

12. All reporting entities are required to submit the STR information in the form ‘Suspicious Transaction Report’ along with supporting ‘Transaction Detail Sheet’ and ‘Branch Detail Sheet’. The reporting entities are also required to submit information in the ‘Instrument Detail Sheet’, ‘Individual Detail Sheet’ and the ‘Legal Person/Entity Detail Sheet’ if the information therein is:

- i) relevant to the suspicion reported,
- ii) available with the reporting entity, and
- iii) not covered in the ‘Transaction Detail Sheet’

Electronic format

13. FIU-IND is in the process of developing technological infrastructure to enable submission of electronic return over a secure gateway. In the interim, the reporting entities should submit the following to Director, FIU-IND:

- i) One CD containing six data files in prescribed data structure. A label mentioning name of the reporting entity, type of report (STR), number of STRs, report date should be affixed on each CD for the purpose of identification.
- ii) Each CD should be accompanied by Suspicious Transaction Report (same form should be used for both manual as well as electronic format) in physical form duly signed by the principal officer. Other detail sheets need not be submitted in the physical form.

14. In case of electronic filing, the reporting entity can submit data of multiple STRs in one CD. The consolidated STR data should have following six data files:

S No.	Filename	Description	Information About
1	SAPCTL.txt	Control File	Suspicion and Report Summary
2	SAPTRN.txt	Transaction File	Transactions
3	SAPBRC.txt	Branch File	Branches/Locations of Institutions
4	SAPINS.txt	Payment Instrument File	Payment Instrument/Card
5	SAPINP.txt	Individual File	Individuals
6	SAPLPE.txt	Legal Person/Entity File	Legal Person/Entity

15. All reporting entities are required to submit the STR information in the Control File (SAPCTL.txt), Transaction File (SAPTRN.txt) and Branch File (SAPBRC.txt). The reporting entities are also required to submit information in the Payment Instrument File (SAPPIN.txt),

<i>Report</i>	<i>Reporting Entity</i>	<i>Version</i>
SUSPICIOUS TRANSACTION REPORT	AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	1.0

Individual File (SAPINP.txt) and Legal Person/Entity File (SAPLPE.txt), if the information therein is:

- i) relevant to the suspicion reported,
- ii) available with the reporting entity, and
- iii) not covered in the Transaction File (SAPTRN.txt)

16. The reporting entities should also ensure the following:

- i) In case the size of data files exceeds the capacity of one CD, the data files should be compressed by using Winzip 8.1 or ZipItFast 3.0 (or higher version) compression utility only to ensure quick and smooth acceptance of the file.
- ii) The CD should be virus free.

Steps in preparation of data files

- i) The following steps may be followed to generate data files:
- ii) The records containing details of suspicious transactions have to be extracted in Transaction Data File (SAPTRN.txt). If one or more related individuals/entities have undertaken multiple transactions, all such transactions should be included in one STR.
- iii) The records containing details of branches/locations related to the transactions have to be extracted in Branch Data File (SAPBRC.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.
- iv) If other Institutions are related to the transactions (Sending/Ordering Institution, Sender's/ Receiver's Correspondent, Intermediary Institution, Customer Account Institution) and their information is available with the reporting entity, their details have to be extracted in Branch Data File (SAPBRC.txt). The relation flag has to be set accordingly.
- v) If details of payment instrument(s)/card(s) related to the transactions are available, their details have to be extracted in Payment Instrument File (SAPPIN.txt).
- vi) 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 (SAPINP.txt). The relation flag has to be set accordingly.
- vii) 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 (SAPLPE.txt). The relation flag has to be set accordingly.
- viii) If the details of Legal Person /Entity have been extracted to Legal Person /Entity File (SAPLPE.txt), the records containing details of Authorized Signatories or Directors/ Partner/ Members etc. of Legal Persons /Entities may be appended to Individual Data File (SAPINP.txt).
- ix) The summary of related transactions in SAPTRN.txt has to be captured in relevant Individual File (SAPINP.txt).

<i>Report</i>	<i>Reporting Entity</i>	<i>Version</i>
SUSPICIOUS TRANSACTION REPORT	AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	1.0

- x) The summary of related transactions in SAPTRN.txt has to be captured in relevant Legal Person/Entity File (SAPLPE.txt).
- xi) The grounds of suspicion and report summary has to be captured in the Control file (SAPCTL.txt).

Steps in validation/sufficiency of data files

17. The following steps may be followed to validate the data files before submission:
- i) There should be six data files with appropriate naming convention. If the number of data files required to report suspicious transactions details is less than six, the reporting entity should include a blank text file with appropriate naming convention to meet this sufficiency requirement.
 - ii) The data files should be as per specified data structure and rules.
 - iii) None of the mandatory fields should be left blank.
 - iv) The summary figures in Control File (SAPCTL.txt) should match with the totals in other data files.
 - v) [STR Reference Number] should be unique in Control File (SAPCTL.txt).
 - vi) The number of records in SAPCTL.txt should match with the number of STRs being reported in the submission.
 - vii) The values of [STR Reference Number] in SAPTRN.txt, SAPBRC.txt, SAPPIN.txt, SAPINP.txt and SAPLPE.txt should have matching value in SAPCTL.txt.
 - viii) For each [STR Reference Number], the [Institution Reference Number] should be unique in Branch Data File (SAPBRC.txt).
 - ix) For each [STR Reference Number], the values of [Institution Reference Number] in SAPBRC.txt should have matching value in various relevant fields in SAPTRN.txt such as Transaction Institution Reference Number, Instrument Issue Institution Reference Number, Account With Institution Reference Number, Related Institution Reference Number.
 - x) For each [STR Reference Number], the values of ([Institution Reference Number] + [Payment Instrument Reference Number]) in SAPPIN.txt should have matching value in relevant fields in SAPTRN.txt.
 - xi) For each [STR Reference Number], the values of [Customer Reference Number] in SAPINP.txt and SAPLPE.txt should have matching value in relevant fields in SAPTRN.txt.
 - xii) The summary figures in SAPINP.txt and SAPLPE.txt should match with the count and totals of relevant transactions in SAPTRN.txt.
 - xiii) The summary figures of count and totals in SAPCTL.txt should match with the count/totals of relevant records in SAPINP.txt, SAPLPE.txt and SAPTRN.txt.

<i>Report</i> SUSPICIOUS TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------------	------------------------------------------------------------------------	-----------------------

General notes for all Data Files

18. The data files should also meet the following requirements:
- i) All Data Files should be generated in ASCII Format with ".txt" as filename extension.
 - ii) Each Record (including last record) must start on new line and must end with a newline character. Hex Values: "0D" & "0A".
 - iii) All CHAR fields must be left justified. If the CHAR field is not blank and the first character is a space, the error would be called '*Leading Space error*'
 - iv) All DATE fields should be entered in YYYY-MM-DD format. If DATE field has no data then the entire field has to be filled with blank characters (Spaces).
 - v) All TIME fields should be in HH:MM:SS format.
 - vi) All NUM fields must be right justified. If NUM field has no data then the field has to be filled with '0'.
 - vii) For fields that do not have an asterisk (*), reasonable efforts have to be made to get the information. In case of CHAR fields with size exceeding 2, enter "NA" to indicate that the field is not applicable. Do not substitute any other abbreviations or special characters (e.g., "x", "-" or "*").

<i>Report</i> SUSPICIOUS TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------------	------------------------------------------------------------------------	-----------------------

Data structure of Control File (SAPCTL.txt)

19. The control file contains report level summary of STRs. This data structure enables submission of multiple STRs. The number of records in SAPCTL.txt should match with the number of STRs being reported in the submission.

S. No.	Field	Type	Size	From	To	Remarks
1	Report Name*	CHAR	3	1	3	Value should be "SAP" signifying Suspicious Transaction Report for Authorized Person and Payment System Operator
2	Record Type*	CHAR	3	4	6	Value should be "CTL" signifying Control file
3	Line Number*	NUM	6	7	12	Running Sequence Number for each line in the file starting from 1. This Number will be used during validation checks.
4	STR Reference Number *	NUM	8	13	20	Indicates the running sequence number of STR for the reporting entity starting from 1. As only one record is required to be submitted for a STR, the STR Reference Number should be unique. The STR reference number would match with the number of STRs filed with FIU. In case of replacement or supplementary STR, it should also have the running sequence number (Serial Number of the Original Report which is being replaced or supplemented has to be provided in Sr No. 21).
5	Report Date*	DATE	10	21	30	Date of sending report to FIU-IND in YYYY-MM-DD format

S. No.	Field	Type	Size	From	To	Remarks
6	Reporting Entity Name*	CHAR	80	31	110	Complete name of the reporting entity which is submitting the report
7	Reporting Entity Category*	CHAR	1	111	111	<p>Category of the reporting entity which is submitting the report.</p> <p>“A”- Authorized Dealer – Category I “B”- Authorized Dealer- Category II “C”- Authorized Dealer- Category III “D”- Full Fledged Money Changers “E”-Payment System Provider “F”- Payment System Participant “Z”- Others</p> <p>If a reporting entity belongs to more than one of the above categories, the category relevant to the reported transactions needs to be mentioned.</p> <p>In case of STR filed by a bank for suspicious transactions on card issued by them, the STR may be filed using the STR format for a banking company.</p>
8	Reporting Entity Code	CHAR	12	112	123	<p>Unique code issued by the regulator/association to identify reporting entity</p> <p>If the code is not available, this field may be left blank.</p>
9	Reporting Entity FIU ID*	CHAR	10	124	133	<p>Unique ID issued by FIU-IND to the reporting entity.</p> <p>Use XXXXXXXXXXXX till the ID is communicated</p>
10	Principal Officer's Name*	CHAR	80	134	213	Field + filler spaces = 80
11	Principal Officer's Designation*	CHAR	80	214	293	Field + filler spaces = 80

<i>Report</i> SUSPICIOUS TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------------	------------------------------------------------------------------------	-----------------------

S. No.	Field	Type	Size	From	To	Remarks
12	Principal Officer's Address*	CHAR	225	294	518	Complete Address
13	Principal Officer's City	CHAR	50	519	568	City/Town
14	Principal Officer's Pin code/ZIP code*	CHAR	10	569	578	Pin code or ZIP code
15	Principal Officer's Country code*	CHAR	2	579	580	Country Code as Per SWIFT. Use IN for India
16	Principal Officer's Telephone	CHAR	30	581	610	Telephone in format STD Code-Telephone number
17	Principal Officer's FAX	CHAR	30	611	640	Fax number in format STD Code-Telephone number
18	Principal Officer's E-mail	CHAR	50	641	690	E-mail address
19	Report Type*	CHAR	1	691	691	"N"- New Report "R"- Replacement to earlier submitted report "S"- Supplementary Report
20	Replacement Reason *	CHAR	1	692	692	"A" – Acknowledgement of Original Report had many warnings or error messages. "B" – Operational error, data omitted in Original Report. "C" – Operational error, wrong data submitted in Original Report. "N"- Not Applicable as this is a new report "Z"- Other Reason
21	Original Report Serial Number*	NUM	8	693	700	Serial Number of the Original Report which is being replaced or supplemented. Mention 0 if Report Type is "N"
22	Operational Mode*	CHAR	1	701	701	"P"- Actual/ Production mode "T"- Test / Trial mode For normal report submission, the operational mode should be 'P'
23	Data Structure Version*	CHAR	1	702	702	Value should be 1 to indicate Version 1

S. No.	Field	Type	Size	From	To	Remarks
24	Number of suspicious transactions reported*	NUM	8	703	710	Count of total number of records in SAPTRN.txt with matching STR Serial Number
25	Amount in suspicious transactions *	NUM	20	711	730	Sum of amount in rupees in records in SAPTRN.txt with matching STR Serial Number
26	Report coverage*	CHAR	1	731	731	“C”- Complete- All suspicious transactions have been reported “P”-Partial- Reported transactions are sample transactions and there are many more similar transactions.
27	Number of branches/locations linked to suspicious transactions*	NUM	8	732	739	Count of total number of records in SAPBRC.txt with matching STR Serial Number
28	Number of payment instruments linked to suspicious transactions*	NUM	8	740	747	Count of total number of records in SAPPIN.txt with matching STR Serial Number (Mention 0 if there are no records in SAPPIN.txt)
29	Number of individuals linked to suspicious transactions*	NUM	8	748	755	Count of total number of records in SAPINP.txt with matching STR Serial Number (Mention 0 if there are no records in SAPINP.txt)
30	Number of legal persons/entities linked to suspicious transactions*	NUM	8	756	763	Count of total number of records in SAPLPE.txt with matching STR Serial Number (Mention 0 if there are no records in SAPLPE.txt)
31	Suspicion of proceeds of crime	CHAR	1	764	764	Mention “Y” or “N”. Refer to the definition of suspicious transactions and indicators given in paragraph 6 and 7 of this document. One STR can have more than one suspicion.

S. No.	Field	Type	Size	From	To	Remarks
32	Suspicion due to unusual or complex transactions	CHAR	1	765	765	Mention "Y" or "N"
33	Suspicion due to no economic rationale or bonafide purpose	CHAR	1	766	766	Mention "Y" or "N"
34	Suspicion of financing of terrorism	CHAR	1	767	767	Mention "Y" or "N"
35	Grounds of Suspicion*	CHAR	4000	768	4767	Write summary of suspicion and sequence of events covering following aspects: How was suspicion detected? What information was collected during the review process? What explanation was provided by the subject(s) or other persons (without tipping off)? Who benefited, financially or otherwise, from the transaction(s), how much, and how (if known)? Whether the suspicious activity is an isolated incident or relates to another transaction? Any further investigation that might assist law enforcement authorities.
36	Details of investigations	CHAR	4000	4768	8767	Write details about agency, contact person and contact details
37	Correspondence to/from Law Enforcement Agency	CHAR	1	8768	8768	"A"- Correspondence has been received from any Law Enforcement Agency (LEA) on this case "B"- Matter has been referred to LEA for enquiries/investigations "C"- No

<i>Report</i> SUSPICIOUS TRANSACTION REPORT	<i>Reporting Entity</i> AUTHORIZED PERSON & PAYMENT SYSTEM OPERATOR	<i>Version</i> 1.0
------------------------------------------------	------------------------------------------------------------------------	-----------------------

S. No.	Field	Type	Size	From	To	Remarks
38	Priority Rating	CHAR	1	8769	8769	Priority attached to the report as per assessment of the reporting entity “A”- Normal “B”- High “C”- Very High
39	Acknowledgement Number	NUM	10	8770	8779	For internal use of FIU-IND. Use value 0
40	Acknowledgement Date	DATE	10	8780	8789	For internal use of FIU-IND. Use value “XXXX-XX-XX”

Data structure of Transaction File (SAPTRN.txt)

20. The transaction file contains details of suspicious transactions.

S. No.	Field	Type	Size	From	To	Remarks
1	Record Type*	CHAR	3	1	3	Value should be "TRN" signifying Transaction data file
2	Line Number*	NUM	6	4	9	Running Sequence Number for each line in the file starting from 1. This number will be used during validation checks.
3	STR Reference Number *	NUM	8	10	17	Indicates the running unique sequence number of STR for the reporting entity. There should be matching value of [STR Reference Number] in SAPCTL.txt
4	Report Date*	DATE	10	18	27	Date of sending report in YYYY-MM-DD Format. This date should be same as in control file
5	Transaction Reference Number	CHAR	20	28	47	<p>Unique Reference Number for the transaction maintained by the reporting entity to uniquely refer to a transaction.</p> <p>In cases, where the reporting entity is reporting two (or more) transactions intrinsically linked to each other (money transfer sent and received), both the records should have common Transaction Reference Number to depict the complete transaction</p>

S. No.	Field	Type	Size	From	To	Remarks
6	Transaction Type*	CHAR	1	48	48	<p>“P” – Purchase/Send transfer “R”– Redemption/Receive transfer The transaction type refers to the transaction conducted by the customer. The transaction file contains the purchase and redemption portion of the transaction in separate rows.</p> <p>In case of STR submitted by an authorised person, the transaction type for purchase of forex/TC by customer is ‘P’. For sale of forex/redemption of TC by customer, the transaction type is ‘R’.</p> <p>In case of STR filed by a money transfer service, the transaction type for sending transfer by a person (outside India) is ‘P’. For receipt of money transfer by customer, the transaction type is ‘R’.</p> <p>In case of STR filed by a payment system provider/participant, the transaction type for use of card is ‘P’. For payment by the person towards card dues, the transaction type is ‘R’.</p>
7	Transaction Date *	CHAR	10	49	58	Date in YYYY-MM-DD Format
8	Transaction Time	CHAR	8	59	66	Time in HH:MM:SS Format

S. No.	Field	Type	Size	From	To	Remarks
9	Instrument Type *	CHAR	1	67	67	<p>“A”- Currency Note</p> <p>“B”- Travelers Cheque</p> <p>“C”- Demand Draft</p> <p>“D”- Money Order</p> <p>“E”-Wire Transfers/TT</p> <p>“F”- Money Transfer</p> <p>“G”- Credit Card</p> <p>“H”- Debit Card</p> <p>“I”- Smart Card</p> <p>“J”- Prepaid Card</p> <p>“K”- Gift Card</p> <p>“Z”- Others</p>
10	Transaction Institution Name*	CHAR	80	68	147	Name of the financial institution where transaction was conducted. In case of money transfer or money exchange, the record should contain name of the entity (agent) where transaction was conducted
11	Transaction Institution Reference Number*	CHAR	12	148	159	Unique Code issued by the regulator/association or any temporary code to uniquely identify the branch/office of the Institution where transaction was conducted. This reference number would enable linkage with the details of the institution in SAPBRC.txt
12	Transaction State Code	CHAR	2	160	161	Code for the state where transaction was conducted. In case of states/UT in India, use the state code as per the Motor Vehicles Act, 1988. Refer to the list of codes at paragraph 24 of this document.
13	Transaction Country Code*	CHAR	2	162	163	Country Code for the country where transaction was conducted as per SWIFT. Use IN for India

S. No.	Field	Type	Size	From	To	Remarks
14	Payment Instrument Number	CHAR	20	164	183	Instrument number such as Card Number used in transaction. Information in field 14 to 17 is not required to be filled if there is no underlying payment instrument.
15	Payment Instrument Issue Institution Name	CHAR	80	184	263	Name of the financial institution issuing the instrument
16	Payment Instrument Issue Institution Reference Number	CHAR	12	264	275	Unique Code issued by the regulator/association or any temporary code to uniquely identify each branch/office where instrument was issued. This reference number would enable linkage with the details of the institution in SAPBRC.txt
17	Payment Instrument Country Code	CHAR	2	276	277	Country Code for the country where instrument was issued as Per SWIFT. Use IN for India
18	Amount in Rupees*	NUM	20	278	297	The amount should be rounded off to nearest rupee without decimal. If this amount was not in Indian Rupees, it should be converted into Indian rupees.
19	Amount in Foreign Currency Unit	NUM	20	298	317	The amount should be rounded off without decimal
20	Currency of Transaction*	CHAR	3	318	320	Mention Currency code as per SWIFT Code. "INR" for Indian Rupees
21	Purpose of transaction*	CHAR	20	321	340	Mention text to define the purpose (such as Private Visit, Visa fees)
22	Purpose Code	CHAR	5	341	345	Purpose code prescribed by RBI in RRETURN6.txt for loading data into the FET-ERS

S. No.	Field	Type	Size	From	To	Remarks
23	Payment Mode	CHAR	1	346	346	The mode of payment made against purchase/redemption “A”- Cheque “B”- Account Transfer “C”- Cash “D”-Demand Draft “E”- Electronic Fund Transfer “Z”- Others
24	Customer Name*	CHAR	80	347	426	Full Name of the customer/sender/receiver. Field + filler spaces = 80
25	Customer Reference Number	CHAR	10	427	436	Any unique reference number to identify the customer. This customer number can be temporarily allotted to enable linkage of transactions details with the individual or legal person/entity in the SAPINP.txt and SAPLPE.txt respectively.
26	Occupation	CHAR	50	437	486	Occupation
27	Date of Birth	DATE	10	487	496	In YYYY-DD-MM format
28	Sex	CHAR	1	497	497	“M”- Male “F”- Female
29	Nationality	CHAR	2	498	499	Country code as per SWIFT. Use IN for India
30	ID Type	CHAR	1	500	500	“A” –Passport “B”- Election ID Card “C”- PAN Card “D”- ID Card “E”- Driving License “Z” – Other
31	ID Number	CHAR	16	501	516	Number mentioned in the identification document
32	ID Issuing Authority	CHAR	20	517	536	Authority which had issued the identification document
33	ID Issue Place	CHAR	20	537	556	Place where document was issued
34	PAN	CHAR	10	557	566	Ten Digit PAN used by Income Tax Department
35	Address*	CHAR	225	567	791	Complete Address
36	City	CHAR	50	792	841	City/Town

S. No.	Field	Type	Size	From	To	Remarks
37	Address Pin code/ZIP code*	NUM	10	842	851	Pin code or ZIP code
38	Address Country Code	CHAR	2	852	853	Country Code for the address as Per SWIFT. Use IN for India
39	Telephone	CHAR	30	854	883	Telephone number in format STD Code-Telephone number
40	Mobile number	CHAR	30	884	913	Mobile number
41	E-mail	CHAR	50	914	963	E-mail address
42	Account Number	CHAR	20	964	983	Account number, if linked to the transaction
43	Account With Institution Name	CHAR	80	984	1063	Name of the financial institution having the account linked to the transaction.
44	Account With Institution Reference Number	CHAR	12	1064	1075	Unique Code issued by the regulator/association or any temporary code to uniquely identify each branch/office having the account. This reference number would enable linkage with the details of the institution in SAPBRC.txt
45	Related Institution Name	CHAR	80	1076	1155	Name of the financial institution having the account linked to the transaction.
46	Institution Relation Flag	CHAR	1	1156	1156	“D”- Sending Institution (SWIFT) “E”-Ordering Institution (SWIFT) “F”- Intermediary Institution (SWIFT) “G”- Correspondent Institution (SWIFT) “H”-Acquirer Institution (Card) “Z”- Others

S. No.	Field	Type	Size	From	To	Remarks
47	Related Institution Reference Number	CHAR	12	1157	1168	Unique Code issued by the regulator/association or any temporary code to uniquely identify branch/office having other relation to the transaction. This reference number would enable linkage with the details of the institution in SAPBRC.txt
48	Transaction Remarks	CHAR	30	1169	1198	Any remark in respect of the transaction

Data structure of Branch File (SAPBRC.txt)

21. The branch file contains information about branches of Institutions related to suspicious transactions. One STR can contain information about multiple branches/locations of the reporting entity and multiple branches/locations of the other entities related to the transactions.

S. No.	Field	Type	Size	From	To	Remarks
1	Record Type*	CHAR	3	1	3	Value should be "BRC" signifying Control file
2	Line Number*	NUM	6	4	9	Running Sequence Number for each line in the file starting from 1. This Number will be used during validation checks.
3	STR Reference Number *	NUM	8	10	17	Indicates the running unique sequence number of STR for the reporting entity. There should be matching value of [STR Reference Number] in SAPCTL.txt
4	Report Date*	DATE	10	18	27	Date of sending report in YYYY-MM-DD Format. This date should be same as in control file
5	Reporting Role	CHAR	1	28	28	<p>"A"-Reporting Entity itself "B"- Other Than Reporting Entity</p> <p>If the name of the branch/location of the entity in the record is different from the reporting entity, the flag should be set as 'B'.</p> <p>E.g. STR filed by a payment system provider would have flag as 'B' in case of record containing details of branch/location of other payment system participants.</p>

S. No.	Field	Type	Size	From	To	Remarks
6	Institution Relation Flag	CHAR	1	29	29	<p>“A”- Transaction Institution (Institution where transaction was conducted) “B”- Instrument Issue Institution (Institution where instrument/card was issued) “C”- Account with Institution (Institution having Account) “D”- Sending Institution (SWIFT) “E”-Ordering Institution (SWIFT) “F”- Intermediary Institution (SWIFT) “G”- Correspondent Institution (SWIFT) “H”-Acquirer Institution (Card) “M”- Multiple Relationships “Z”- Others</p> <p>As there could be more than one branch/location relevant to the STR, appropriate flags should be set for each record.</p>
7	Institution Name*	CHAR	80	30	109	Name of Institution relevant to the transactions. As there could be more than one branch/location relevant to the STR, appropriate details should be provided in separate records.
8	Institution Branch Name*	CHAR	80	110	189	Name of the branch/location relevant to the transactions.

S. No.	Field	Type	Size	From	To	Remarks
9	Institution Reference Number*	CHAR	12	190	201	<p>Unique Code issued by the regulator/association or any temporary code to uniquely identify each branch/office.</p> <p>For each [STR Reference Number], the [Institution Reference Number] should be unique in Branch Data File (SAPBRC.txt).</p> <p>For each [STR Reference Number], the values of [Institution Reference Number] in SAPBRC.txt should have matching value in various relevant fields in SAPTRN.txt such as Transaction Institution Reference Number, Instrument Issue Institution Reference Number, Account With Institution Reference Number, Related Institution Reference Number.</p>
10	BIC of the branch	CHAR	11	202	212	Bank identification code (BIC) of the branch as per SWIFT or ISO 9362 if available
11	Branch Address*	CHAR	225	213	437	Complete Address
12	Branch City	CHAR	50	438	487	City/Town
13	Branch Pin code/ZIP code*	NUM	10	488	497	Pin code or ZIP code
14	Branch Country Code*	CHAR	2	498	499	Country Code for the branch as Per SWIFT. Use IN for India
15	Branch Telephone	CHAR	30	500	529	Telephone number in format. STD Code-Telephone number
16	Branch Fax	CHAR	30	530	559	Fax number in format STD Code-Telephone number
17	Branch E-mail	CHAR	50	560	609	E-mail address
18	Branch Remarks	CHAR	30	610	639	Any remark in respect of the branch/location

Data structure of Payment Instrument File (SAPPIN.txt)

22. The Payment Instrument file contains information about payment instrument(s)/card(s) related to the suspicious transactions. The reporting entities are required to submit relevant information in Payment Instrument File (SAPPIN.txt), if the information therein is:

- i) relevant to the suspicion reported,
- ii) available with the reporting entity, and
- iii) not covered in the Transaction File (SAPTRN.txt)

S. No.	Field	Type	Size	From	To	Remarks
1	Record Type*	CHAR	3	1	3	Value should be "PIN" signifying Reported Payment Instrument file
2	Line Number*	NUM	6	4	9	Running Sequence Number for each line in the file starting from 1. This Number will be used during validation checks.
3	STR Reference Number *	NUM	8	10	17	Indicates the running unique sequence number of STR for the reporting entity. There should be matching value of [STR Reference Number] in SAPCTL.txt
4	Report Date*	DATE	10	18	27	Date of sending report in YYYY-MM-DD Format. This date should be same as in control file
5	Institution Name*	CHAR	80	28	107	Name of Institution which has issued the payment instrument/card
6	Institution Reference Number*	CHAR	12	108	119	Unique Code issued by the regulator/association or any temporary code for the institution
7	Payment Instrument Reference Number*	CHAR	20	120	139	Unique Number of the payment instrument/card
8	Payment Instrument Type*	CHAR	1	140	140	"G"- Credit Card "H"- Debit Card "I"- Smart Card "J"- Prepaid Card "K"- Gift Card "Z"- Others

S. No.	Field	Type	Size	From	To	Remarks
9	Payment Instrument Holder Name	CHAR	80	141	220	Name of Person to whom the payment instrument was issued
10	Relationship Beginning Date	DATE	10	221	230	Date of issue of payment instrument in YYYY-MM-DD Format
11	Risk Category	CHAR	1	231	231	Risk Category as per the Internal Risk Assessment “A”- Low Risk “B”- Medium Risk “C”- High Risk
12	Cumulative Purchase Turnover	NUM	20	232	251	Sum of all purchases in the payment Instrument /card from 1 st April of the financial year till the last day of the month of reporting. If report is being furnished for Jan 2009 then transactions from 1 st April 2008 to 31 st Jan 2009 have to be aggregated. The amount should be rounded off to nearest rupee without decimal.
13	Payment Instrument Remarks	CHAR	30	252	281	Any remark in respect of the payment Instrument/ card

Data structure of Individual File (SBAINP.txt)

23. The Individual file contains information about individual(s) related to the suspicious transactions. The reporting entities are required to submit information in the Individual File (SAPINP.txt), if the information therein is:

- i) relevant to the suspicion reported,
- ii) available with the reporting entity, and
- iii) not covered in the Transaction File (SAPTRN.txt)

S. No.	Field	Type	Size	From	To	Remarks
1	Record Type*	CHAR	3	1	3	Value should be "INP" signifying Individual data file
2	Line Number*	NUM	6	4	9	Running Sequence Number for each line in the file starting from 1. This Number will be used during validation checks.
3	STR Reference Number *	NUM	8	10	17	Indicates the running unique sequence number of STR for the reporting entity. There should be matching value of [STR Reference Number] in SAPCTL.txt
4	Report Date*	DATE	10	18	27	Date of sending report in YYYY-MM-DD Format. This date should be same as in control file
5	Relation Flag*	CHAR	80	28	107	Indicates the relation of Individual with the reported transactions. "A"- Customer "B"- Authorised Signatory of a Legal Person /Entity Customer "C"- Director/ Partner/Member etc. of a Legal Person /Entity Customer "D"- Introducer "E"- Guarantor "Z" – Other

S. No.	Field	Type	Size	From	To	Remarks
6	Individual Name*	CHAR	12	108	119	Full Name Field + filler spaces = 80
7	Customer Reference Number	CHAR	1	120	120	Any unique reference number to identify the customer. This customer number can be temporarily allotted to enable linkage of transactions details with the individual.
8	Establishing Relationship Date	DATE	20	121	140	Date since when the reporting entity has relationship with the customer. In YYYY-MM-DD format
9	Father/Spouse Name	CHAR	80	141	220	Full Name of Father/Spouse Field + filler spaces = 80
10	Occupation	CHAR	1	221	221	Occupation
11	Date of Birth	DATE	10	222	231	In YYYY-MM-DD format
12	Sex	CHAR	10	232	241	“M”- Male “F”- Female
13	Nationality	CHAR	1	242	242	Country code as per SWIFT
14	ID Type	CHAR	20	243	262	“A” –Passport “B”- Election ID Card “C”- PAN Card “D”- ID Card “E”- Driving License “Z” – Other
15	ID Number	CHAR	20	263	282	Number mentioned in the identification document
16	ID Issuing Authority	CHAR	20	283	302	Authority which had issued the identification document
17	ID Issue Place	CHAR	20	303	322	Place where document was issued
18	PAN	CHAR	3	323	325	Ten Digit PAN used by Income Tax Department
19	Communication Address*	CHAR	225	326	550	Complete Address
20	Communication City	CHAR	50	551	600	City/Town
21	Communication Address Pin code/ZIP code*	NUM	1	601	601	Pin code or ZIP code
22	Communication Country Code	CHAR	20	602	621	Country Code for the communication address as Per SWIFT. Use IN for India

S. No.	Field	Type	Size	From	To	Remarks
23	Contact Telephone	CHAR	80	622	701	Telephone number in format STD Code-Telephone number
24	Contact Mobile number	CHAR	1	702	702	Mobile number
25	Contact E-mail	CHAR	10	703	712	E-mail address
26	Place of Work	CHAR	10	713	722	Name of Organisation/ employer
27	Number of purchase transactions	NUM	1	723	723	Count of number of purchase transactions in the STR related to the individual (records in SAPTRN.txt with Transaction Type = "P")
28	Value of purchase transactions	NUM	20	724	743	Sum of amount of purchase transactions in the STR related to the individual
29	Number of redemption transactions	NUM	20	744	763	Count of number of redemption transactions in the STR related to the individual (records in SAPTRN.txt with Transaction Type = "R")
30	Value of redemption transactions	NUM	20	764	783	Sum of amount of redemption transactions in the STR related to the individual
31	Individual Remarks	CHAR	30	784	813	Remarks specific to individual

Data structure of Legal Person/Entity File (SBALPE.txt)

24. The Legal Person/Entity file contains information about legal person/entity(s) related to the suspicious transactions. The reporting entities are also required to submit information in the Legal Person/Entity File (SAPLPE.txt), if the information therein is:

- i) relevant to the suspicion reported,
- ii) available with the reporting entity, and
- iii) not covered in the Transaction File (SAPTRN.txt)

S. No.	Field	Type	Size	From	To	Remarks
1	Record Type*	CHAR	3	1	3	Value should be "LPE" signifying Legal Persons/ Entity data file
2	Line Number*	NUM	6	4	9	Running Sequence Number for each line in the file starting from 1. This Number will be used during validation checks.
3	STR Reference Number *	NUM	8	10	17	Indicates the running unique sequence number of STR for the reporting entity. There should be matching value of [STR Reference Number] in SAPCTL.txt
4	Report Date*	DATE	10	18	27	Date of sending report in YYYY-MM-DD Format. This date should be same as in control file
5	Relation Flag*	CHAR	1	28	28	Indicates the relation of the legal person/entity with the reported transactions "A"- Customer "D"- Introducer "E"- Guarantor "Z" - Other
6	Legal Person /Entity Name *	CHAR	80	29	108	Full Name Field + filler spaces = 80
7	Customer Reference Number	CHAR	10	109	118	Any unique reference number to identify the customer. This customer number can be temporarily allotted to enable linkage of transactions details with the legal person/entity.

S. No.	Field	Type	Size	From	To	Remarks
8	Relationship Establishing Date	DATE	10	119	128	Date since when the reporting entity has relationship with the customer. In YYYY-MM-DD format
9	Nature of Business	CHAR	50	129	178	Nature of Business
10	Date of Incorporation	DATE	10	179	188	In YYYY-MM-DD format
11	Constitution Type *	CHAR	1	189	189	“A”- Sole Proprietorship “B”- Firm “C”- HUF “D”- Private Ltd. Company “E”- Public Ltd. Company “F”- Society “G”- Association “H”- Trust “I”- Liquidator “Z”- Other
12	Registration Number	CHAR	20	190	209	Registration Number of mentioned in deed/document
13	Registering authority	CHAR	20	210	229	Authority Registering deed/document
14	Registration Place	CHAR	20	230	249	Place where the document was registered
15	Country Code	CHAR	2	250	251	Country code for the country of incorporation as per SWIFT
16	PAN	CHAR	10	252	261	Ten Digit PAN used by Income Tax Department
17	Communication Address*	CHAR	225	262	486	Complete Address
18	Communication City	CHAR	50	487	536	City/Town
19	Communication Address Pin code/ZIP code*	NUM	10	537	546	Pin code or ZIP code
20	Communication Country Code	CHAR	2	547	548	Country Code for the communication address as Per SWIFT. Use IN for India
21	Contact Telephone	CHAR	30	549	578	Telephone number in format STD Code-Telephone number
22	Contact Fax	CHAR	30	579	608	Fax number in format STD Code-Telephone number
23	Contact Email	CHAR	50	609	658	E-mail address

S. No.	Field	Type	Size	From	To	Remarks
24	Number of purchase transactions	NUM	20	659	678	Count of number of purchase transactions in the STR related to the legal person/entity (records in SAPTRN.txt with Transaction Type = "P")
25	Value of purchase transactions	NUM	20	679	698	Sum of amount of purchase transactions in the STR related to the legal person/entity
26	Number of redemption transactions	NUM	20	699	718	Count of number of redemption transactions in the STR related to the legal person/entity (records in SAPTRN.txt with Transaction Type = "R")
27	Value of redemption transactions	NUM	20	719	738	Sum of amount of redemption transactions in the STR related to the legal person/entity
28	Legal Person/Entity Remarks	CHAR	30	739	768	Remarks specific to legal person/entity

List of State codes

25. The codes for state/UT as per the Motor Vehicles Act 1988.

S. No.	Name of State/UT	Code
1	Andaman & Nicobar	AN
2	Andhra Pradesh	AP
3	Arunachal Pradesh	AR
4	Assam	AS
5	Bihar	BR
6	Chandigarh	CH
7	Chattisgarh	CG
8	Dadra and Nagar Haveli	DN
9	Daman & Diu	DD
10	Delhi	DL
11	Goa	GA
12	Gujarat	GJ
13	Haryana	HR
14	Himachal Pradesh	HP
15	Jammu & Kashmir	JK
16	Jharkhand	JH
17	Karnataka	KA
18	Kerala	KL
19	Lakshadweep	LD
20	Madhya Pradesh	MP
21	Maharashtra	MH
22	Manipur	MN
23	Meghalaya	ML
24	Mizoram	MZ
25	Nagaland	NL
26	Orissa	OR
27	Pondicherry	PY
28	Punjab	PB
29	Rajasthan	RJ
30	Sikkim	SK
31	Tamil Nadu	TN
32	Tripura	TR
33	Uttar Pradesh	UP
34	Uttarakhand	UA
35	West Bengal	WB