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

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Introduction

26. 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.

27. 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

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

29. "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).

30. "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

31. 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.

32. 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	**General** • 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	**General** • 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.

Type of suspicion	Sample indicators for detection of suspicious transactions
	Money Transfer • 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.
Suspicion due to no economic rationale or bonafide purpose	**General** • 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. **Behavioural** • 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.

Type of suspicion	Sample indicators for detection of suspicious transactions
	- 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. **Money Transfer** - 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

Type of suspicion	Sample indicators for detection of suspicious transactions
	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.

Money Exchange

- 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

Type of suspicion	Sample indicators for detection of suspicious transactions
	consistent with known travel plans. • Customer wants to exchange cash for numerous instruments in small amounts for numerous other parties. **Card Operations** • 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, anonymous prepaid credit card, gift card etc.).

Type of suspicion	Sample indicators for detection of suspicious transactions
	• 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	**General** • 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

33.   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

34.   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)

35.   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

36.   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

37.   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

38.   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:

   iii) 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.

   iv) 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.

39.   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

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

   iii) relevant to the suspicion reported,

   iv) available with the reporting entity, and

   v) not covered in the Transaction File (SAPTRN.txt)

41.   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

   xiv) The following steps may be followed to generate data files:

   xv) 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.

xvi) 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.

xvii) 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.

xviii) 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).

xix) 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.

xx) 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.

xxi) 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).

xxii) The summary of related transactions in SAPTRN.txt has to be captured in relevant Individual File (SAPINP.txt).

xxiii) The summary of related transactions in SAPTRN.txt has to be captured in relevant Legal Person/Entity File (SAPLPE.txt).

xxiv) The grounds of suspicion and report summary has to be captured in the Control file (SAPCTL.txt).

Steps in validation/sufficiency of data files

42.   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.

General notes for all Data Files

43.   The data files should also meet the following requirements:

viii) All Data Files should be generated in ASCII Format with ".txt" as filename extension.

ix) Each Record (including last record) must start on new line and must end with a newline character. Hex Values: "0D" & "0A".

x) 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*'

xi) 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).

xii) All TIME fields should be in HH:MM:SS format.

xiii) All NUM fields must be right justified. If NUM field has no data then the field has to be filled with '0'.

xiv) 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 "*").

Data structure of Control File (SAPCTL.txt)

44. 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

S. No.	Field	Type	Size	From	To	Remarks
						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
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	Category of the reporting entity which is submitting the report. "A"- Authorized Dealer – Category I "B"- Authorized Dealer- Category II

S. No.	Field	Type	Size	From	To	Remarks
						"C"- Authorized Dealer- Category III
						"D"- Full Fledged Money Changers
						"E"-Payment System Provider
						"F"- Payment System Participant
						"Z"- Others
						If a reporting entity belongs to more than one of the above categories, the category relevant to the reported transactions needs to be mentioned.
						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.
8	Reporting Entity Code	CHAR	12	112	123	Unique code issued by the regulator/association to identify reporting entity

S. No.	Field	Type	Size	From	To	Remarks
						If the code is not available, this field may be left blank.
9	Reporting Entity FIU ID*	CHAR	10	124	133	Unique ID issued by FIU-IND to the reporting entity. Use XXXXXXXXX till the ID is communicated
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 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

S. No.	Field	Type	Size	From	To	Remarks
						"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

S. No.	Field	Type	Size	From	To	Remarks
						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 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	NUM	8	740	747	Count of total number of records in SAPPIN.txt with matching STR

S. No.	Field	Type	Size	From	To	Remarks
	transactions*					Serial Number (Mention 0 if the 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.
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"

S. No.	Field	Type	Size	From	To	Remarks
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	CHAR	4000	4768	8767	Write details about agency, contact

S. No.	Field	Type	Size	From	To	Remarks
	investigations					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
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)

45.   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	Unique Reference Number for the transaction maintained by the reporting entity to uniquely refer to a transaction.

S. No.	Field	Type	Size	From	To	Remarks
						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 to the transaction conducted by the customer. The transaction file contains the purchase and redemption portion of the

S. No.	Field	Type	Size	From	To	Remarks
						transaction in separate rows.
						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'.
						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'.
						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

S. No.	Field	Type	Size	From	To	Remarks
						type is 'R'.
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	"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 "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

S. No.	Field	Type	Size	From	To	Remarks
						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

S. No.	Field	Type	Size	From	To	Remarks
						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 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

S. No.	Field	Type	Size	From	To	Remarks
						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

S. No.	Field	Type	Size	From	To	Remarks
						"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 |

S. No.	Field	Type	Size	From	To	Remarks
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

S. No.	Field	Type	Size	From	To	Remarks
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

S. No.	Field	Type	Size	From	To	Remarks
						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 SAPBRC.txt
48	Transaction Remarks	CHAR	30	1169	1198	Any remark in respect of the transaction

Data structure of Branch File (SAPBRC.txt)

46.   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	"A"-Reporting Entity itself "B"- Other Than Reporting Entity

S. No.	Field	Type	Size	From	To	Remarks
						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'.
						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.
6	Institution Relation Flag	CHAR	1	29	29	"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

S. No.	Field	Type	Size	From	To	Remarks
						(SWIFT)
						"E"-Ordering Institution (SWIFT)
						"F"- Intermediary Institution (SWIFT)
						"G"- Correspondent Institution (SWIFT)
						"H"-Acquirer Institution (Card)
						"M"- Multiple Relationships
						"Z"- Others
						As there could be more than one branch/location relevant to the STR, appropriate flags should be set for each record.
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

S. No.	Field	Type	Size	From	To	Remarks
						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	Unique Code issued by the regulator/association or any temporary code to uniquely identify each branch/office.

For each [STR Reference Number], the [Institution Reference Number] should be unique in Branch Data File (SAPBRC.txt).

For each [STR Reference Number], the values of [Institution Reference Number] in SAPBRC.txt should have matching |

S. No.	Field	Type	Size	From	To	Remarks
						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.
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

S. No.	Field	Type	Size	From	To	Remarks
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)

47. 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

S. No.	Field	Type	Size	From	To	Remarks
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

S. No.	Field	Type	Size	From	To	Remarks
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 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.
13	Payment Instrument Remarks	CHAR	30	252	281	Any remark in respect of the payment Instrument/ card

Data structure of Individual File (SBAINP.txt)

48. 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.

S. No.	Field	Type	Size	From	To	Remarks
						"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
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

S. No.	Field	Type	Size	From	To	Remarks
						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	CHAR	225	326	550	Complete Address

S. No.	Field	Type	Size	From	To	Remarks
	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
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

S. No.	Field	Type	Size	From	To	Remarks
						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)

49.   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

S. No.	Field	Type	Size	From	To	Remarks
						"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 "D"- Private Ltd. Company "E"- Public Ltd.

S. No.	Field	Type	Size	From	To	Remarks
						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

S. No.	Field	Type	Size	From	To	Remarks
						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 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

S. No.	Field	Type	Size	From	To	Remarks
						person/entity
28	Legal Person/Entity Remarks	CHAR	30	739	768	Remarks specific to legal person/entity

List of State codes

50.   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

S. No.	Name of State/UT	Code
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